



**Lebalelo Water User Association**  
**SE2 pipeline and associated infrastructure**  
**Seventeenth Construction Environmental Audit Report**  
**DDFE Reference Number: 14/12/16/3/3/1/2442**

February 2024

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# Lebalelo Water User Association

## SE2 pipeline and associated infrastructure

### Seventeenth Construction Environmental Audit Report

February 2024

Project Ref: 131-001

Prepared by: Tyla Leigh Smith / Kirithi Peramaul



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#### VERSION CONTROL

Alta van Dyk Environmental (Pty) Ltd

Version: Final

Reviewed by: Suzanne van Rooy

Approved by: Alta van Dyk

Signed:

A handwritten signature in black ink, appearing to read "Alta van Dyk", is written over a light blue horizontal line.

Position: Environmental Specialist

Date: February 2024

# Executive Summary

## Introduction

Alta van Dyk Environmental Consultants (Pty) Ltd (AVDE) was appointed as the independent Environmental Control Officer (ECO) for Lebalelo Water User Association's (LWUA) proposed SE2 raw water pipeline and associated infrastructure project. This environmental audit report was undertaken in terms Appendix 7 of the Environmental Impact Assessment (EIA) Regulations (2014) of the National Environmental Management Act (Act No. 107 of 1998) (NEMA). The environmental audit was undertaken in order to comply with LWUA's approved Environmental Management Programme Report (EMPr) as well as the conditions stipulated in the Environmental Authorisation received from the competent authority, the Department of Forestry, Fisheries and the Environment (DFFE). This environmental audit report serves as the sixteenth construction audit report.

## Audit findings

An overall compliance rating of 95% has been achieved for the February 2024 audit, which also serves as the seventeenth construction compliance audit for the project. Conditions and commitments from four documents were considered, namely the environmental authorisation, approved EMPr, final comments from the South African Heritage Resources Agency (SAHRA) and additional conditions from SAHRA. Refer to the table below.

Document	% Compliance
Environmental authorisation	96%
EMPr	85%
SAHRA	100%
SAHRA additional conditions	100%
<b>Total % Compliance</b>	<b>95%</b>

## Non-Conformities

The following findings were observed on site resulting in partial or non-compliance scores:

- The excavation of the pipeline route has commenced and soil excavated are stored adjacent to the excavation. A portion of the pipeline has been backfilled and soil was noted to be placed correctly. Portions of the pipeline route which have been recently excavated near the two rivers mine was noted to not separate topsoil and subsoil on site.
- Waste bins were noted as part of this audit.
  - Spitskop Pump Station:
    - Waste bins were noted as well as a skip which was covered with a net to prevent waste form being blown away.
    - The signage for the specific waste streams was not clearly marked due to wear and tear, it was indicated that new signs are put in place.
  - Pipeline Route:
    - Poor housekeeping was noted along the pipeline route. The observation was specifically around waste stockpiled along the route. It is suggested that all waste be removed from site and disposed of appropriately.
    - No waste bin was noted along the pipeline route at active construction sites and at the Wetland area
  - Reservoir Site:
    - A waste bin was noted at the reservoir site which was marked for the specific waste stream. Poor Housekeeping was noted as a work in progress
  - Waste Management:
    - Waste is being disposed of at the Steelpoort Industrial Park within waste skips. Steelpoort Industrial Park had a permit to dispose of waste at the Burgersfort Landfill site which was

valid until December 2023. An updated agreement was requested by the audit team, this was not provided at the time of this audit.

- A hydrocarbon spill was observed at the Reservoir during the February Audit. It was indicated that this needs to be managed as per the spill management plan in place.
- It was observed that drip trays are placed under some equipment on site, however some generators/pumps were noted to be operated without drip trays.
- Alien and Invasive species were found along the pipeline route as well as at the Spitskop Pump Station.
- No chemical toilets were observed along the pipeline route currently being constructed.
- Approval was granted for the clearance of a corridor area of 25m (inclusive of the servitude). Currently approximately a 17m corridor is cleared for construction of the pipeline. However, at the wetland area, vegetation clearance must be limited to the servitude (15m). Currently the clearance in the wetland area is 30 m.

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## *Abbreviations*

APM	Archaeology, Palaeontology and Meteorites
AVDE	Alta van Dyk Environmental Consultants
BGG	Burial Grounds and Graves
DFFE	Department of Forestry, Fisheries and Environment
DWS	Department of Water and Sanitation
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme Report
EA	Environmental Authorisation
LWUA	Lebalelo Water User Association
NEMA	National Environmental Management Act
NHRA	National Heritage Resources Act
NWA	National Water Act
ORWRDP	Olifants River Water Resource Development Project
SACNASP	South African Council for Natural Science Professions
SAHRA	South African Heritage Resources Association
SAHRIS	South African Heritage Resources Information System

# 1 INTRODUCTION

## 1.1 Scope and purpose of the report

This report presents the findings of the February 2024 environmental audit (Seventeenth construction audit) for Lebalelo Water User Association's (LWUA) proposed SE2 raw water pipeline and associated infrastructure project.

A Basic Assessment environmental process for the proposed project was undertaken in terms of the National Environmental Management Act (Act No. 107 of 198) (NEMA) (as amended), and the Final Environmental Management Programme Report (EMPr) was submitted to the Department of Forestry, Fisheries and the Environment (DFFE) as the competent authority on 3 March 2022. The Environmental Authorisation (EA) for the project was received from the DFFE on 28 April 2022 under reference number 14/12/16/3/3/1/2442.

An Environmental Authorisation amendment application and Final updated EMPr was submitted to the DFFE on 18 July 2022. The amended Environmental Authorisation was received from the DFFE on 16 August 2022.

This environmental audit report has been compiled in compliance with Section 34 of NEMA Environmental Impact Assessment (EIA) Regulations and aims to assess LWUA's level of compliance of the conditions of the Environmental Authorisation, the commitments in the Environmental Management Programme (EMPr) and conditions from South African Heritage Resources Association (SAHRA) for project.

Alta van Dyk Environmental Consultants (Pty) Ltd (AVDE) was appointed as the independent Environmental Control Officer (ECO) by Infraburo (Pty) Ltd on behalf of LWUA. Infraburo serves as an implementation agent on the project. AVDE is appointed as the ECO for the construction phase of the project and was responsible for the environmental audit.

## 1.2 Details of the holder of the environmental authorisation

The holder of the environmental authorisation is LWUA. The details of the contact person are shown in Table 1:1.

**Table 1:1 Details of the applicant**

<b>Authorisation holder</b>	Lebalelo Water User Association
<b>Address</b>	Lynnwood Bridge Office Park 4 Daventry Street Lynnwood Manor, Pretoria 0081
<b>Contact person:</b>	Bertus Bierman
<b>Telephone number:</b>	082 462 7379
<b>Email address</b>	<a href="mailto:bierman@lebalelo.co.za">bierman@lebalelo.co.za</a>

## 1.3 Details of the Contractor

Esor Construction (Pty) Ltd was appointed by Infraburo on behalf of LWUA to undertake the construction activities for the SE2 raw water pipeline and associated infrastructure.

Table 1:2 provides the details of the appointed contractor.



**Table 1:2 Details of the contractor**

<b>Contractor</b>	Esor Construction (Pty) Ltd
<b>Address</b>	10 Flower Street Hermanus
<b>Contact person:</b>	Etienne Clarke
<b>Telephone number:</b>	079 493 6309
<b>Email address</b>	<a href="mailto:etiennec@esor.co.za">etiennec@esor.co.za</a>

## 1.4 Details and expertise of the person who prepared the environmental audit report

Kirthi Peramaul and Tyla Leigh Smith of AVDE were responsible for the seventeenth construction environmental audit. The site visit was undertaken on 20 February 2024.

Table 1:3 provides the details of the persons who prepared the environmental audit report

**Table 1:3: Details of the persons who prepared the environmental audit report**

<b>Company</b>	Alta van Dyk Environmental Consultants (Pty) Ltd
<b>Postal Address</b>	Postnet Suite # 745 Private Bag X 1007 Lyttelton 0140
<b>Telephone number:</b>	012 940 9457
<b>Fax number:</b>	086 634 3967
<b>Environmental Control Officer</b>	Kirthi Peramaul Pr.Sci.Nat (Reg Nr. 400012/18) EAPASA Registered EAP Ref 2020/1537) B.Sc. Hons Environmental Monitoring & Modelling <a href="mailto:kirthi@avde.co.za">kirthi@avde.co.za</a>
<b>Environmental Control Officer</b>	Tyla Leigh Smith EAPASA Registered Candidate EAP (Ref 2022/4939) BSc Geography and Environmental Management (University of Johannesburg) <a href="mailto:tyla@avde.co.za">tyla@avde.co.za</a>

Kirthi Peramaul (BSc Hons Environmental Monitoring and Modelling, Pr.Sci.Nat, Registered EAP). Kirthi has 13 years' experience in the environmental management field and is currently registered with the South African Council of Natural Scientific Professions (SACNASP) as a Professional Natural Scientist (Registration No 400012/18: Environmental Science) and is as a Registered Environmental Assessment Practitioner with the Environmental Assessment Practitioners Association of South Africa (EAPASA) (Registration No 2020/1537). Kirthi specialises in environmental authorisations, environmental compliance monitoring, environmental management plans, water use authorisation, stakeholder engagement, risk assessments and blue and green drop auditing. She has been involved in ECO projects relating to mixed-use developments and housing development.

Tyla Leigh Smith holds a B.Sc. in Geography and Environmental Management from the University of Johannesburg. Tyla has 3 years' experience in the environmental management field and is currently registered as a Candidate Environmental Assessment Practitioner with the Environmental Assessment Practitioners Association of South Africa (EAPASA) (Registration No 2022/4939). Tyla has been involved as an

environmental consultant in various EIA's in terms of NEMA, Water Use Applications in terms of the National Water Act (NWA) (No 36 of 1998) and external audits. Tyla's responsibilities include the overall management of projects, and the identification and assessment of environmental impacts.

Kirthi Peramaul and Tyla Leigh Smith meet the requirements for independence as they do not have and will not have any financial interest in the undertaking of the activity, other than remuneration for work performed in terms of the EIA Regulations, 2017, and has no vested interest in the proposed activity proceeding, and also has no, and will not engage in, conflicting interests in the undertaking of the activity.

## 1.5 Audit report regulatory requirements

According to Appendix 7(2) of the NEMA Environmental Impact Assessment (EIA) Regulations, the content of an environmental audit report should entail:

- Reporting on the level of compliance with the conditions of the environmental authorisation and the EMPr, as well as the extent to which the avoidance, management and mitigation measures provided for in the EMPr achieve the objectives and outcomes of the EMPr;
- Identify and assess any new impacts and risks as a result of undertaking the activity;
- Evaluation the effectiveness of the EMPr;
- Identify shortcomings in the EMPr; and
- Identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr.

The content of the environmental audit report is specified in Appendix 7(3) of the NEMA EIA Regulations and set out in Table 1:4.

**Table 1:4: Content of the environmental audit report**

No	Description	Reference
1	An environmental audit report prepared in terms of these Regulations must contain–	
a)	details of the– (i) independent person who prepared the environmental audit report; and (ii) the expertise of the independent person that compiled the environmental audit report;	Section 1.3
b)	a declaration that the independent auditor is independent in a form as may be specified by the competent authority;	Annexure A
c)	an indication of the scope of, and the purpose of which, the environmental audit report was prepared;	Section 1.1
d)	a description of the methodology adopted in preparing the environmental audit report;	Section 3
e)	an indication of the ability of the EMPr, the closure plan in the case of a closure activity to– (i) sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on and on-going basis; (ii) sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the closure of the facility in the case of a closure activity; and (iii) ensure compliance with the provisions of the environmental authorisation, EMPr and the closure plan in the case of a closure activity;	Section 5
f)	A description of any assumptions made, and any uncertainties or gaps in knowledge;	Section 3.4
g)	A description of any consultation process that was undertaken during the course of carrying out the environmental audit report;	Section 3
h)	A summary and copies of any comments that received during any consultation process; and	None received

<b>No</b>	<b>Description</b>	<b>Reference</b>
i)	Any other information requested by the competent authority.	No additional information has been requested by the competent authority

## **2 PROJECT BACKGROUND AND DESCRIPTION**

### **2.1 Background to LWUA**

The LWUA was established to supply raw water to mines along the Eastern Limb of the Bushveld Igneous Complex. The main aim of the project was to supply raw water to a number of existing and planned new mines in the area, and as a spin-off, to provide additional capacity in the water supply scheme to meet the requirements of the rural population in the area. Only raw water is provided by LWUA, and the responsibility of treatment to drinking water standards lies with the distributing authority. The water is abstracted from the Olifants River via the Flag Boshielo Dam and abstracted at the Havercroft weir. The users receiving the water from the pipeline make up the LWUA. The Lebalelo water supply forms part of the Olifants River Water Resource Development Project (ORWRDP). The water is currently sourced from the Olifants River via the Flag Boshielo Dam, with abstraction at the Havercroft weir, and in future will be from the Steelpoort River via De Hoop Dam.

### **2.2 SE2 pipeline and associated infrastructure project**

LWUA is proposing a new raw water pipeline between the Spitskop Pump Station and Mototolo Mine, near Steelpoort in the Limpopo Province. This project is also referred to as the SE2 pipeline. There is an existing raw water pipeline running from LWUA's Havercroft Pump Station to Borwa Pump Station, referred to as Southern Extension 1 (SE1). The new pipeline (SE2) will be located within the current pipeline's (SE1) servitude. The purpose of the new pipeline (SE2) is to provide raw water to several mines and industries located along the pipeline route. The current pipeline's capacity is not sufficient for the growing water demand from LWUA's members.

The following is proposed for the new pipeline (SE2) project:

#### **Phase 1:**

- New pump station at existing Spitskop Pump Station (within fenced area of existing Spitskop Pump Station);
- New 500mm raw water pipeline 15 km in length from Spitskop Pump Station to Dwarsrivier Pump Station (within the current pipeline servitude); and
- New concrete reservoir to be constructed near the Dwarsrivier Pump Station (10 Mℓ).

#### **Phase 2:**

- Solar panels (75 x 75m) to be constructed within fenced area of existing Spitskop Pump Station. This is for a 0,5MW solar panel generation plant;
- New pump station adjacent to the current Dwarsrivier Pump Station; and
- New 300 or 350 mm raw water pipeline 9 km in length from the new Dwarsrivier Pump Station to Mototolo Mine (within current pipeline servitude).

#### **Currently, only Phase 1 activities forms part of the construction programme.**

The proposed SE2 pipeline will provide raw water to the following entities:

- Lion Smelter (Glencore South Africa);
- Dwarsrivier Mine (Assore);
- Two Rivers Mine (African Rainbow Minerals);
- Mototolo Mine (Anglo American Platinum); and
- Steelpoort Industrial Park (Freedom Property Fund) (potentially).

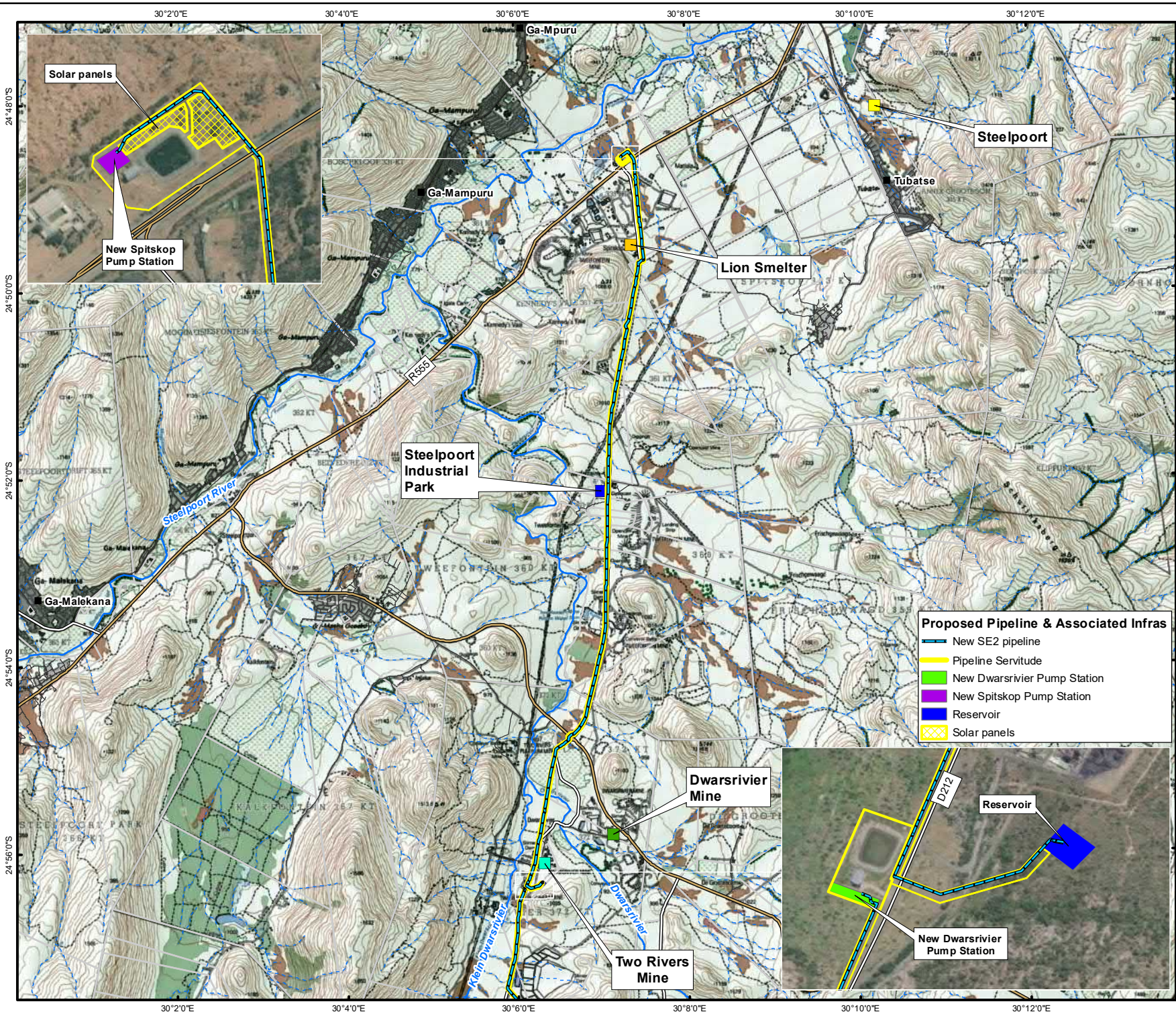
## 2.3 Locality

The proposed project is located near Steelpoort in the Limpopo Province. Table 2:1 outlines the details relating to the location of the proposed project. Refer to Figure 2:1 for the locality map.

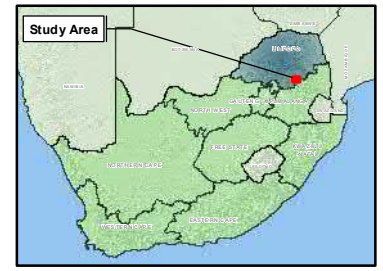
**Table 2:1 Project location details**

Site specific details	Description	
<b>Municipal jurisdiction</b>	Fetakgomo Tubatse Local Municipality Sekhukhune District Municipality	
<b>Ward number</b>	Ward 27	
<b>Nearest town</b>	The proposed SE2 pipeline starts approximately 5 km west from Steelpoort, Limpopo Province, from where it runs in a southerly direction to Mototolo Mine.	
<b>Site coordinates</b>	<b>Latitude</b>	<b>Longitude</b>
<b>New Spitskop Pump Station</b>	24°48'36.25"S	30° 7'14.65"E
<b>Solar panels</b>	24°48'33.73"S	30° 7'20.34"E
<b>SE2 Pipeline – Spitskop Pump Station to Dwarsrivier Pump Station (new reservoir): Start</b>	24°48'37.68"S	30° 7'17.04"E
<b>SE2 Pipeline – Spitskop Pump Station to Dwarsrivier Pump Station (new reservoir): End</b>	24°56'19.63"S	30° 6'17.57"E
<b>New Dwarsrivier Pump Station</b>	24°56'23.18"S	30° 6'2.78"E
<b>Reservoir</b>	24°56'19.26"S	30° 6'18.66"E
<b>SE2 Pipeline: Dwarsrivier Pump Station to Mototolo Mine: Start</b>	24°56'23.19"S	30° 6'3.70"E
<b>SE2 Pipeline: Dwarsrivier Pump Station to Mototolo Mine: End</b>	25° 0'33.07"S	30° 6'46.16"E

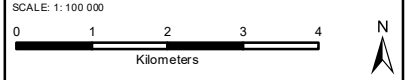
The approved project layout is shown in Figure 2:1



- ### Legend
- Dwarsrivier Mine
  - Two Rivers Mine
  - Lion Smelter
  - Steelport
  - Steelport Industrial Park
  - Farm Portion
  - Village
  - Secondary Road
  - Tertiary Road
  - Street/Road
  - Perennial River Centre line
  - Non-Perennial River Centre line



- ### Proposed Pipeline & Associated Infras
- New SE2 pipeline
  - Pipeline Servitude
  - New Dwarsrivier Pump Station
  - New Spitskop Pump Station
  - Reservoir
  - Solar panels



TITLE:  
**Figure 2:1 Locality map of the proposed SE2 pipeline and associated infrastructure: Spitskop Pump Station to Dwarsrivier Pump Station**

CLIENT:  
**Lebalelo Water User Association**

DATE: Dec 2021	PROJECT: SE2_PIPELINE
DRAWN: THU RLOW MAPPING	APPROVED: SVR
MAP: SE2_Pipeline_Locality_A3_Fig1.1.mxd	REV: 2

**Alta van Dyk Environmental Consultants cc** (2011/059764/23)  
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 Cel: 061 403 2462



Projection: Transverse Mercator CM: 31 Datum: WGS 84  
 Source: OSM Vector 2021 -  
 NGI: TOP OSG Mosaic\_latest\_Editions\_Jan-2017.ecw  
 Inset: ESRI Data and Maps

SIZE:  
**A3**

Path: C:\GIS\_PROJECTS\_PVT\WVD\_ENVIRO\SE2\_PIPELINE\MAPPING\MXD\SE2\_Pipeline\_Locality\_A3\_Fig1.mxd

## **2.4 Construction of new infrastructure**

### **2.4.1 New pump station at Spitskop Pump Station**

A new pump station will be constructed next to the existing Spitskop Pump Station within the existing Lebalelo servitude. The existing connection point at the pump station will be used to abstract water from the existing Department of Water and Sanitation (DWS) pipeline between the De Hoop Dam and the Steelpoort Pump Station. Excavations will be done by mechanical means and by hand and the excavated material stockpiled on the site and used for backfilling. Any surplus material will be spread and finished off in the area around the pump station in the fenced off servitude.

Once the excavation has been completed a concrete blinding layer, approximately 50mm thick will be constructed. This will be followed by the fixing of steel reinforcement for the structure followed by the erection of shuttering according to the dimensions of the structure as per the relevant drawings.

After approval of shuttering and reinforcement for correctness the concrete will be cast, finished off, and after treatment of the concrete carried out to prevent it from drying out rapidly. Concrete will preferably be obtained from a ready-mix plant within the area.

Once the concrete has reached sufficient strength, the shutters will be stripped off, the concrete finished and the backfilling around the structure done.

The pump station walls will consist of steel columns with filled in brick.

The above work will be carried out by hand making use of people with the required skills under management and supervision of the Contractor.

### **2.4.2 Raw water pipeline (Spitskop Pump Station to Dwarsrivier Pump Station)**

Excavations of the pipeline trench will be carried out using an excavator and the material stockpiled along the trench for later use for backfilling after the pipe has been laid. Vehicle movement, trench excavation and parallel stockpiling of excavated material will take place within a corridor of approximately 25m (including the 15m servitude), except for where the pipeline crosses wetlands areas, where construction activities will be limited to the servitude, as per the recommendation of the wetland specialist.

Once the trench has been backfilled the pipe bedding will be trimmed and prepared to receive the pipes. Pipes will be laid using mechanical equipment to lift it and place it in position. This work will all be done in accordance with the levels as per the relevant drawings.

After laying of the pipes the pipe blanket will be constructed using selected material from the excavated material and compacted by hand and making use of walk behind self-propelled compaction equipment.

After completion of the fill blanket around the pipe the bulk backfilling will be done using the excavated material and compacted with walk behind self-propelled compaction equipment.

The pipeline crosses the R555 and the road D1261\_010 (adjacent to the Lion Smelter) and the road to Mashishing (D1212\_05). The three pipeline crossings will be done by means of pipe jacking a sleeve underneath the roads and position the steel pipe through the sleeve. The ends of the sleeve will be closed off once the pipe is in position.

The total length of the pipeline is approximately 15 000m.

### 2.4.3 Concrete reservoir

A new 10ML reservoir will be constructed near the existing Dwarsrivier Pump Station. The work entails the following:

Excavations will be done by mechanical means and the excavated material will be spread and finished off in the area around the reservoir in the fenced off servitude.

Once the excavation has been completed a concrete blinding layer, approximately 50mm thick will be constructed. This will be followed by the fixing of steel reinforcement for the structure followed by the erection of shuttering according to the dimensions of the structure as shown on the drawings.

After approval of shuttering and reinforcement for correctness the concrete will be cast, finished off, and after treatment of the concrete carried out to prevent it from drying out rapidly. Concrete for the floor slab will preferably be obtained from a ready-mix plant within the area. The walls and roof of the reservoir utilise pre-fabricated modules to speed up the construction process and to limit construction activities on site.

The above work will be carried out by mechanical means and by hand making use of people with the required skills under management and supervision of the Contractor.

### 2.4.4 Valve chambers

Concrete valve chambers will be constructed at approximately 200m intervals along the pipeline. Such valve chambers are mainly used for maintenance purposes.

At the positions of the valve chambers the trench excavations will be widened to provide working space for the workers. The floor area of the valve chambers will be trimmed and compacted using hand tools after the concrete blinding layer will be constructed to provide a clean working area. This will be followed by the fixing of the steel reinforcement and erection of the shuttering.

Once the reinforcement has been inspected and approve the shuttering will be erected in accordance with the details on the drawings and the concrete cast using concrete from a ready-mix plant within the area.

After the concrete has gained sufficient strength, the shutters will be removed, the concrete finished off and the backfilling around the structures done and compacted and the areas finished off neatly. Any excess material will be spread over the area round the structures and finished off.

LWUA is also considering using pre-cast chambers, should it be a more viable option.

## 2.5 Environmental related permits undertaken

Triggerred listed activities in terms of the National Environmental Management Act (Act No. 107 of 1998) (NEMA) 2014 Environmental Impact Assessment (EIA) Regulations (as amended in 2017) are shown in Table 2:2 below.

**Table 2:2: Listed activities triggered by the SE2 pipeline and associated infrastructure project**

List and activity number	Listed activity	Description of activity
Listing 1 Activity 9	The development of infrastructure exceeding 1 000 meters in length for the bulk transportation of water or storm water – (i) with an internal diameter of 0.36 meters or more; or (ii) with a peak throughput of 120 litres per second or more,	The development of the SE2 raw water pipeline between Spitskop Pump Station and Dwarsrivier Pump Station is 15 km in length with an internal diameter of 500mm (0.5m), and therefore triggers this activity.



List and activity number	Listed activity	Description of activity
		The development of the SE2 raw water pipeline between Dwarsrivier Pump Station and Mototolo Mine is 9 km in length with an internal diameter of 300/350mm (0.3/0.35m), and therefore does not trigger this activity.
Listing 1 Activity 19	The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse;	The proposed SE2 raw water pipeline crosses several watercourses and earthworks will be required within these watercourses to construct the proposed pipeline.
Listing 1 Activity 27	The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation,	Clearance of indigenous vegetation will take place for the proposed SE2 pipeline, but as it is a linear activity, this listed activity does not apply. However, the following areas will also be cleared: Solar panels (0.5 ha) New Spitskop Pump Station (0.16 ha) New reservoir at Dwarsrivier Pump Station (0.53ha) New Dwarsrivier Pump Station (0.2 ha) The cumulative clearance of indigenous vegetation is more than 1 ha.
Listing 3 Activity 2	The development of reservoirs, excluding dams, with a capacity of more than 250 cubic metres. <u>Limpopo:</u> ii. Outside urban areas: (dd) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans;	A concrete reservoir with a capacity of 10Mℓ will be developed outside an urban area, within an Ecological Support Area as per the Limpopo Conservation Plan (LCP).
Listing 3 Activity 12	The clearance of an area of more than 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. <u>Limpopo:</u> i. Within any critically endangered or endangered ecosystem listed in terms of section 52 of NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004; ii. Within critical biodiversity areas identified in bioregional plans; or	The proposed SE2 pipeline and associated infrastructure will require the clearing of more than 300m <sup>2</sup> of indigenous vegetation, within in areas listed as Critical Biodiversity areas and Ecological support areas as per the LCPv2. The project area overlaps predominantly within an ecosystem that is listed as Least Concern, with a portion of the northern extent of the SE2 pipeline located in and endangered ecosystem.
Listing 3 Activity 14	The development of-	The proposed SE2 pipeline crosses watercourses outside an urban

List and activity number	Listed activity	Description of activity
	ii. infrastructure or structures with a physical footprint of 10 square metres or more; where such development occurs- (a) within a watercourse; (c) if no development setback has been adopted, within 32 metres of a watercourse, measured from the edge of a watercourse; <u>Limpopo:</u> i. Outside urban areas: (bb) National Protected Area Expansion Strategy Focus areas; (ff) Critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plan adopted by the competent authority or in bioregional plans;	area, within areas considered as Priority Focus Areas as per the National Protected Area Expansion Strategy and areas listed as Critical Biodiversity areas and Ecological support areas as per the LCPv2.

In addition, a Water Use Licence Application was submitted to the DWS in terms of the National Water Act (Act No. 36 of 1998) (NWA) as Section 21 water uses are triggered by the proposed development.

Table 2:3 list the water uses that required authorisation in terms of Section 21 of the National Water Act for the development.

**Table 2:3 List of Section 21 Water Uses applied for**

Section 21 Water Use	Activities which require the Water Use Licence
(c) – impeding or diverting the flow of water in a watercourse (i) – altering the bed, banks, course or characteristics of a watercourse	<ul style="list-style-type: none"> <li>• Watercourse crossing by SE2 pipeline</li> <li>• Activities to be undertaken with a horizontal distance of 100m from the edge of the watercourse and within 500m of a delineated wetland.</li> </ul>

A General Authorisation in terms of the NWA was issued by the DWS on 12 October 2021 for the proposed project.

### 3 METHODOLOGY

#### 3.1 Audit process

The following activities were undertaken as part of the environmental audit:

- Environmental audit preparation, including the compilation of an environmental audit checklist including the commitments contained in the EMPr, Environmental Authorisation and conditions received from SAHRA;
- An on-site assessment undertaken on 20 February 2024, to assess the level of compliance to the EMPr, environmental authorisation and conditions from SAHRA and to document the tenth construction audit state of the site and document photographic evidence;
- Meeting with the on-site contractor (refer to Annexure B for the attendance register)
- Taking of photographs of observations made during the on-site assessment (Annexure C);
- Information gathered from the contractor;
- Relevant documentation reviewed on site;
- Compilation of the environmental audit report.

The audit process is illustrated in Figure 3:1.

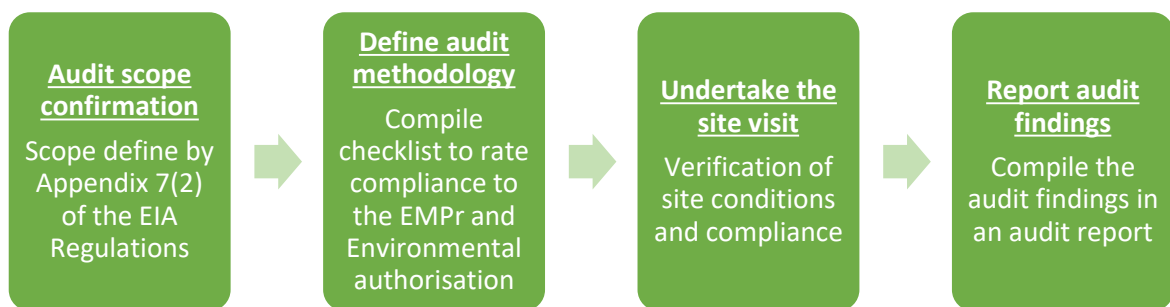


Figure 3:1 Overview of the audit process

#### 3.2 Documents reviewed

The following documents were used to create the audit checklist:

- Environmental Authorisation (28 April 2022) and Amended Environmental Authorisation (16 August 2022) received from the DFFE;
- Final Updated Environmental Management Programme (July 2022);
- Final comment letter form SAHRA.
- SAHRA additional conditions received on 11 September 2023

#### 3.3 Audit scoring system

Table 3:1 provides the scoring system used to assess each of the conditions of the Environmental Authorisation, EMPr commitment and SAHRA conditions. Each section has a percentage of compliance on all the conditions/commitments to be able to provide an overall compliance review.

Table 3:1 Scoring system

Legend	Colour Coding
Fully Compliant	2

Legend	Colour Coding
Partially Compliant	1
Non-Compliant	0
Not Applicable	NA

### 3.4 Assumptions and limitation

The following assumptions and limitations applies to this environmental audit report:

- All project information relevant to the audit has been provided by LWUA and Esor Construction (Pty) Ltd;
- Information provided by LWUA is correct and valid at the time of the audit;
- The EMPr, environmental authorisation and final comment letter from SAHRA represents all the documentation that contain mitigation measures and/or commitments/conditions.

## **4 AUDIT FINDINGS**

The results of the audit findings undertaken for the proposed project is shown as follows:

- Table 4:1 Audit findings of the Environmental Authorisation;
- Table 4:2 Audit findings of the EMPr;
- Table 4:3 Audit findings of SAHRA's conditions; and
- Table 4:4 Audit findings of SAHRA's additional conditions.

Table 4:1 Audit findings of the Environmental Authorisation

Audit Findings of the Environmental Authorisation				
NR	ENVIRONMENTAL AUTHORISATION CONDITION	COMPLIANCE STATEMENT	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
<b>SCOPE OF AUTHORISATION</b>				
1	The preferred 15 km pipeline route between the Spitskop Pump Station and Dwarsrivier Pump Station reservoir and the 9 km pipeline route between Dwarsrivier Pump Station and Mototolo Mine for the construction of the new Lebalelo Water User Association Southern Extension 2 (SE2) raw water pipeline, Option 2 for the new concrete Reservoir, and the associated infrastructure between the Spitskop Pump Station and the Mototolo Mine near Steelpoort, within the Fetakgomo Tubatse Local Municipality, Limpopo Province, are approved as per the geographic coordinates cited in the tables above.	2	Construction is taking place at the geographic co-ordinates sited within the Environmental Authorisation.	The SE2 pipeline and associated infrastructure may only be constructed as per the coordinates included in the Environmental Authorisation received from the DFFE.
2	Authorisation of the activity is subject to the conditions contained in this Environmental Authorisation, which form part of the Environmental Authorisation and are binding on the holder of the authorisation.	2	LWUA understands that the authorisation for the SE2 Raw Water Pipeline and Associated Infrastructure project is subject to the conditions set out in the Environmental Authorisation.	None
3	The holder of the authorisation is responsible for ensuring compliance with the conditions contained in this Environmental Authorisation. This includes any person acting on the holder's behalf, including but not limited to, an agent, servant, contractor, sub-contractor, employee, consultant or person rendering a service to the holder of the authorisation.	2	LWUA understands that the responsibility to ensure compliance of the conditions within the Environmental Authorisation lies with them as the applicant and will ensure any person acting on their behalf adhere to the conditions of the approved Environmental Authorisation.  LWUA has appointed Infraburo as the implementation agent and Esor Construction as the site contractor and has ensured that the contractor understands the conditions of the authorisation.	All conditions that need to be adhered to be included within a contactor pack to be given to all persons to ensure compliance with the conditions set out by the competent authorities.
4	The activities authorised may only be carried out at the property as described above.	2	Construction activities have commenced and are taking place on the properties as described in the environmental authorisation.	None
5	Any changes to, or deviations from, the project description set out in this Environmental Authorisation must be approved, in writing, by the Department before such changes or deviations may be effected. In assessing whether to grant such approval or not, the Department may request such information as it deems necessary to evaluate the significance and impacts of such changes or deviations and it may be necessary for the holder of the authorisation to apply for further Environmental Authorisation in terms of the regulations.	NA	This condition is not applicable at the time of this audit (February 2024) as no change in project description has taken place.	LWUA to take cognisance that any changes to the project description set out in the Environmental Authorisation must be approved in writing from the Department before the changes may be affected.
6	The holder of an Environmental Authorisation must apply for an amendment of the Environmental Authorisation with the Competent Authority for any alienation, transfer or change of ownership rights in the property on which the activity is to take place.	NA	This condition is not applicable at the time of this audit (February 2024) as no transfer or change of ownership rights in the property on which the activity is to take place has been undertaken.	LWUA to take cognisance that if the ownership rights change a formal amendment needs to be applied for with the Department.
7	This activity must commence within a period of ten (10) years from the date of issue of this Environmental Authorisation. If commencement of the activity does not occur within that period, the authorisation lapses and a new application for Environmental Authorisation must be made in order for the activity to be undertaken.	2	Construction of the SE2 raw water pipeline and associated infrastructure commenced on 24 October 2022, which is within 10 years from the date of issue of the Environmental Authorisation (28 April 2022).	None
8	Construction must be completed within five (05) years of the commencement of the activity on site.	2	Construction commenced on 24 October 2022, and the applicant needs to complete construction by 23 October 2027.	LWUA to take cognisance that all construction activities must be completed within 5 years of commencement of construction (i.e. by 23 October 2027).
<b>NOTIFICATION OF AUTHORISATION AND RIGHT TO APPEAL</b>				
9	The holder of the authorisation must notify every registered interested and affected party, in writing and within 14 (fourteen) calendar days of the date of this authorisation, of the decision to authorise the activity.	2	AVDE undertook the environmental authorisation process for the SE2 raw water pipeline project and notified all I&APs of the environmental authorisation for the project on 9 May 2022. A notification letter was sent via email to stakeholders. Proof of this can be found within the onsite compliance file. The Environmental Authorisation was	Proof of notification to stakeholders of the environmental authorisation and amendment must be kept in the on-site compliance file.

Audit Findings of the Environmental Authorisation				
NR	ENVIRONMENTAL AUTHORISATION CONDITION	COMPLIANCE STATEMENT	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
			granted on 28 April 2022 and the date of notification falls within the 14 calendar days. Photographic evidence can be found in Annexure C: Photo 1. In addition, an amendment to the Environmental Authorisation was received on 16 August 2022. Stakeholders were notified of the amendment via email on 18 August 2022, which is within 14 days of receiving the Environmental Authorisation Amendment. Photographic evidence can be found in Annexure C: Photo 1.	
10	The notification referred to must -			
10.1	specify the date on which the authorisation was issued;	2	The date of authorisation was included within the communication sent to all stakeholders when notifying them of the approved Environmental Authorisation and amendment.	None
10.2	inform the interested and affected party of the appeal procedure provided for in the National Appeal Regulations, 2014	2	The appeal procedure was included within the communication sent to all stakeholders when notifying them of the approved Environmental Authorisation and amendment.	None
10.3	advise the interested and affected party that a copy of the authorisation will be furnished on request; and	2	A copy of the approved authorisation and amendment was included within the communication sent to all stakeholders when notifying them of the approved Environmental Authorisation and amendment.	None
10.4	give the reasons of the Competent Authority for the decision.	2	Reasons from the competent authority on the decision was included within the communication sent to all stakeholders when notifying them of the approved Environmental Authorisation.	None
<b>COMMENCEMENT OF THE ACTIVITY</b>				
11	The authorised activity shall not commence until the period of the submission of appeals has lapsed as per the National Appeal regulations, 2014, and no appeal has been lodged against the decision. In terms of Section 43(7), an appeal under Section 43 of the National Environmental Management Act, Act No. 107 of 1998, as amended will suspend the Environmental Authorisation or any provision or condition attached thereto. In the instance where an appeal is lodged you may not commence with the activity until such time that the appeal has been finalised.	2	It was confirmed with the DFFE on 12 September 2022 that no appeals were received for the SE2 raw water pipeline and associated infrastructure project.  Construction activities commenced on the 24 October 2022, which is after the appeal period.  Photographic evidence can be found in Annexure C: Photo 2.	None
<b>MANAGEMENT OF THE ACTIVITY</b>				
12			This condition was removed as part of the environmental authorisation amendment (14/12/16/3/3/1/2442/AM1) dated 16 August 2022.	None
13.1 - 13.6			This condition was removed as part of the environmental authorisation amendment (14/12/16/3/3/1/2442/AM1) dated 16 August 2022.	None
14			This condition was removed as part of the environmental authorisation amendment (14/12/16/3/3/1/2442/AM1) dated 16 August 2022.	None
15.1 - 15.4			This condition was removed as part of the environmental authorisation amendment (14/12/16/3/3/1/2442/AM1) dated 16 August 2022.	None
16	The EMPr must be implemented and strictly enforced during all phases of the project. It shall be seen as a dynamic document and shall be included in all contract documentation for all phases of the development when approved.	2	The EMPr has been included within the on-site compliance file. LWUA has appointed Infraburo as the implementation agent and Esor Construction as the site contractor and has	It is advised that all conditions that need to be adhered to be included within a contractor pack to be given to all persons to

Audit Findings of the Environmental Authorisation				
NR	ENVIRONMENTAL AUTHORISATION CONDITION	COMPLIANCE STATEMENT	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
			<p>ensured that the contractor understands the conditions of the EMPr.</p> <p>AVDE conducted Environmental Awareness Training with Esor Construction during the pre-construction audit on 16 September 2022. This training looked at all of the EMPr conditions and how they must be implemented on site. The contractors were instructed that Environmental Training will need to be undertaken for all workers on the project. It was confirmed that a copy of the EMPr is included within the contractor packs which is provided to all personnel who works on the project.</p> <p>Photographic evidence can be found in Annexure C: Photo 4, 5, 6 and 8.</p>	ensure compliance with the conditions set out by the competent authorities.
17	Changes to the approved EMPr must be submitted in accordance with the EIA Regulations applicable at the time.	NA	This condition is not applicable as no changes to the EMPr are currently required.	LWUA to take cognisance that any changes to the EMPr must be submitted in accordance with the EIA Regulations applicable at the time.
18	The Department reserves the right to amend the approved EMPr should any impacts that were not anticipated or covered in the BAR be discovered.	2	LWUA understands that the Department has the right to amend the EMPr if any impact not anticipated is discovered.	None
<b>FREQUENCY AND PROCESS OF UPDATING THE EMPR</b>				
19	The EMPr must be updated where the findings of the environmental audit report, contemplated in Condition 26 below, indicate insufficient mitigation of environmental impacts associated with the undertaking of the activity, or insufficient levels of compliance with the environmental authorisation or EMPr.	NA	This condition is not applicable at the time of this audit (February 2024) as no insufficient mitigation of environmental impacts have been identified.	LWUA to take cognisance that if any insufficient mitigation measures are identified, the EMPr must be updated.
20	The updated EMPr must contain recommendations to rectify the shortcomings identified in the environmental audit report.	NA	This condition is not applicable at the time of this audit (February 2024) as no shortcomings have been identified in the environmental audit report.	LWUA to take cognisance that if the EMPr is updated, the update must contain sufficient recommendations to rectify shortcomings identified.
21	The updated EMPr must be submitted to the Department for approval together with the environmental audit report, as per Regulation 34 of the EIA Regulations, 2014 as amended. The updated EMPr must have been subjected to a public participation process, which process has been agreed to by the Department, prior to submission of the updated EMPr to the Department for approval.	NA	This condition is not applicable at the time of this audit (February 2024) as the EMPr have not been updated.	LWUA to take cognisance that if the EMPr is updated a public participation process needs to be undertaken prior to submission to the Department.
22	In assessing whether to grant approval of an EMPr which has been updated as a result of an audit, the Department will consider the processes prescribed in Regulation 35 of the EIA Regulations, 2014 as amended. Prior to approving an amended EMPr, the Department may request such amendment to the EMPr as it deems appropriate to ensure that the EMPr sufficiently provides for avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity.	NA	This condition is not applicable at the time of this audit (February 2024) as the EMPr need not be updated as a result of findings in the environmental audit report.	None
23	The holder of the authorisation must apply for an amendment of an EMPr, if such amendment is required before an audit is required. The amendment process is prescribed in Regulation 37 of the EIA Regulations, 2014, as amended. The holder of the authorisation must request comments on the proposed amendments to impact management outcomes of the EMPr or amendment to the closure objectives of the closure plan from potentially interested and affected parties, including the competent authority, by using any of the methods provided for in the Act for a period of at least 30 days.	NA	This condition is not applicable at the time of this audit (February 2024) as no insufficient mitigation of environmental impacts have been identified.	LWUA to take cognisance that if the EMPr is updated a formal amendment process will need to be followed as per the EIA Regulations.
<b>MONITORING</b>				
24	The holder of the authorisation must appoint an experienced Environmental Control Officer (ECO) for the construction phase of the development that will have the responsibility to ensure that the mitigation / rehabilitation measures and recommendations referred to in this environmental authorisation are implemented and to ensure compliance with the provisions of the approved EMPr.	2	LWUA has appointed Alta van Dyk Environmental Consultant (AVDE) as the ECO for this project. Consultants from AVDE are undertaking monthly site visits and environmental auditing to ensure all conditions stipulated in the Environmental Authorisation are being adhered to.	None



Audit Findings of the Environmental Authorisation				
NR	ENVIRONMENTAL AUTHORISATION CONDITION	COMPLIANCE STATEMENT	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
24.1	The ECO must be appointed before commencement of any authorised activities.	2	Alta van Dyk Environmental Consultants were appointed as the ECO for this project before the commencement of the authorised activities.  Notification of appointment of AVDE as the ECO for this project was communicated to the DFFE on 13 September 2022, which is prior to the commencement of construction of authorised activities.  Photographic evidence can be found in Annexure C: Photo 3.	It is recommended that a copy of the notification letter to the DFFE on appointment of the ECO be kept on file for record keeping purposes.
24.2	Once appointed, the name and contact details of the ECO must be submitted to the <i>Director: Compliance Monitoring</i> of the Department.	2	A notification letter was sent via email on 13 September 2022 to the Director: Compliance Monitoring at the Department indicating that AVDE was appointed as the ECO for this project.  Photographic evidence can be found in Annexure C: Photo 3.	None
24.3	The ECO must keep record of all activities on site, problems identified, transgressions noted and a task schedule to tasks undertaken by the ECO.	2	All tasks undertaken by the ECO is explained in Section 3 of the environmental audit report. Record of activities on site and problems identified are documented in the monthly environmental audit reports.	Copies of the monthly environmental audit reports must be kept in the on-site compliance file.
24.4	The ECO must remain employed until all rehabilitation measures, as required for implementation due to construction damage, are completed and the site is ready for operation.	2	AVDE will remain employed as the ECO for the duration of the construction phase until all construction activities have been undertaken and rehabilitation have been completed.	None
<b>RECORDING AND REPORTING TO THE DEPARTMENT</b>				
25	All documentation e.g. audit/monitoring/compliance reports and notifications, required to be submitted to the Department in terms of this environmental authorisation, must be submitted to the <i>Director: Compliance Monitoring</i> of the Department	2	At the time of this audit (February 2024) the following documentation have been submitted to the DFFE Director: Compliance Monitoring: <ul style="list-style-type: none"> <li>• A notification letter informing the Department of the appointment of AVDE as the ECO.</li> <li>• The pre-construction audit report undertaken in September 2022 and submitted to the DFFE on 06 October 2022.</li> <li>• The first construction audit report undertaken in October 2022 and submitted to the DFFE on 03 November 2022.</li> <li>• The second construction audit report undertaken in November 2022 and submitted to the DFFE on 1 December 2022.</li> <li>• The third construction audit report undertaken in December 2022 and submitted to the DFFE on 20 December 2022.</li> <li>• The fourth construction audit report undertaken in January 2023 and submitted to the DFFE on 6 February 2023.</li> <li>• The fifth construction audit report undertaken in February 2023 and submitted to the DFFE on 6 March 2023.</li> <li>• The sixth construction audit report undertaken in March 2023 and submitted to the DFFE on 4 April 2023.</li> <li>• The seventh construction audit report undertaken in April 2023 and submitted to the DFFE on 5 May 2023.</li> </ul>	It is recommended that a copies of the environmental audit reports and submission thereof to the department be kept in the on-site compliance file.

Audit Findings of the Environmental Authorisation				
NR	ENVIRONMENTAL AUTHORISATION CONDITION	COMPLIANCE STATEMENT	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
			<ul style="list-style-type: none"> <li>The eighth construction audit report undertaken in May 2023 and submitted to the DFFE on 2 June 2023.</li> <li>The ninth construction audit report undertaken 20 June 2023 and submitted to the DFFE on 12 July 2023.</li> <li>The tenth construction audit report undertaken 18 July 2023 and submitted to the DFFE on 8 August 2023.</li> <li>The eleventh construction audit report undertaken 15 August 2023 and submitted to the DFFE on 11 September 2023.</li> <li>The twelfth construction audit report undertaken 19 September 2023 and submitted to the DFFE on 12 October 2023.</li> <li>The thirteenth construction audit report undertaken on 17 October 2023 and submitted to the DFFE on 2 November 2023. * The fourteenth construction audit report undertaken on 14 November 2023 and submitted to the DFFE on 27 November 2023.</li> <li>The fifteenth construction audit report undertaken on 6 December 2023 and submitted to the DFFE on 14 December 2023.</li> <li>The sixteenth construction audit report undertaken on 16 January 2024 and submitted to the DFFE on 8 February 2023.</li> </ul> <p>No other documentation at the time of this audit were identified for submission. Proof of submission of the audit reports (emails to DFFE) are kept in the on-site compliance folder.</p>	
26	The holder of the environmental authorisation must, for the period during which the environmental authorisation and EMPr remain valid, ensure that project compliance with the conditions of the environmental authorisation and the EMPr are audited, and that the audit reports are submitted to the <i>Director: Compliance Monitoring</i> of the Department.	2	<p>At the time of this audit (February 2024) the following documentation have been submitted to the DFFE Director: Compliance Monitoring:</p> <ul style="list-style-type: none"> <li>A notification letter informing the Department of the appointment of AVDE as the ECO.</li> <li>The pre-construction audit report undertaken in September 2022 and submitted to the DFFE on 06 October 2022.</li> <li>The first construction audit report undertaken in October 2022 and submitted to the DFFE on 03 November 2022.</li> <li>The second construction audit report undertaken in November 2022 and submitted to the DFFE on 1 December 2022.</li> <li>The third construction audit report undertaken in December 2022 and submitted to the DFFE on 20 December 2022.</li> <li>The fourth construction audit report undertaken in January 2023 and submitted to the DFFE on 6 February 2023.</li> <li>The fifth construction audit report undertaken in February 2023 and submitted to the DFFE on 6 March 2023.</li> </ul>	It is recommended that all audit reports, as well as proof of submission to the DFFE (emails) be kept on site within the on-site compliance file.

Audit Findings of the Environmental Authorisation				
NR	ENVIRONMENTAL AUTHORISATION CONDITION	COMPLIANCE STATEMENT	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
			<ul style="list-style-type: none"> <li>The sixth construction audit report undertaken in March 2023 and submitted to the DFFE on 4 April 2023.</li> <li>The seventh construction audit report undertaken in April 2023 and submitted to the DFFE on 5 May 2023.</li> <li>The eighth construction audit report undertaken in May 2023 and submitted to the DFFE on 2 June 2023.</li> <li>The ninth construction audit report undertaken 20 June 2023 and submitted to the DFFE on 12 July 2023.</li> <li>The tenth construction audit report undertaken 18 July 2023 and submitted to the DFFE on 8 August 2023.</li> <li>The eleventh construction audit report undertaken 15 August 2023 and submitted to the DFFE on 11 September 2023.</li> <li>The twelfth construction audit report undertaken 19 September 2023 and submitted to the DFFE on 12 October 2023.</li> <li>The thirteenth construction audit report undertaken on 17 October 2023 and submitted to the DFFE on 2 November 2023.* The fourteenth construction audit report undertaken on 14 November 2023 and submitted to the DFFE on 27 November 2023.</li> <li>The fifteenth construction audit report undertaken on 6 December 2023 and submitted to the DFFE on 14 December 2023.</li> <li>The sixteenth construction audit report undertaken on 16 January 2024 and submitted to the DFFE on 8 February 2023.</li> </ul> <p>No other documentation at the time of this audit were identified for submission. Proof of submission of the audit reports (emails to DFFE) are kept in the on-site compliance folder.</p>	
27	The frequency of auditing and of submission of the environmental audit reports must be as per the frequency indicated in the EMP, taking into account the processes for such auditing as prescribed in Regulation 34 of the EIA Regulations, 2014 as amended.	2	As per the approved EMP, environmental audits are undertaken monthly during construction to ensure compliance with the conditions of the Environmental Authorisation and approved EMP. These reports are submitted to the Director: Compliance Monitoring of the DFFE.	It is recommended that all audit reports and submission thereof to the Department be kept within the on-site compliance file.
28	The holder of the authorisation must, in addition, submit environmental audit reports to the Department within 30 days of completion of the construction phase (i.e. within 30 days of site handover) and a final environmental audit report within 30 days of completion of rehabilitation activities.	NA	This condition is not applicable as the construction phase has not been completed.	None
29	The environmental audit reports must be compiled in accordance with Appendix 7 of the EIA Regulations, 2014 as amended and must indicate the date of the audit, the name of the auditor and the outcome of the audit in terms of compliance with the environmental authorisation conditions as well as the requirements of the approved EMP.	2	AVDE has been appointed as the ECO on this project. This report serves as the seventeenth construction environmental audit report. All audit reports will be undertaken in line with the Appendix 7 of the EIA Regulations, 2014 as amended. Refer to Table 1.4. The date, name of auditor and outcome for every condition is included within this audit report.	It is recommended that all audit reports to be kept on site within the on-site compliance file.

Audit Findings of the Environmental Authorisation				
NR	ENVIRONMENTAL AUTHORISATION CONDITION	COMPLIANCE STATEMENT	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
30	Records relating to monitoring and auditing must be kept on site and made available for inspection to any relevant and competent authority in respect of this development.	2	All Environmental Permits, Authorisations and Audit Reports from September 2022, are kept within the on-site compliance folder. Electronic filing of the audit reports are maintained by the Contractor. Photographic evidence can be found in Annexure C: Photo 7, 8, 9, 10, 11, 12 and 13.  An inspection site visit with regards to the Protected Trees Permit was undertaken by the competent authority (DFFE) on 30 January and 12 October 2023.	It is recommended that copies of all environmental audit reports be kept within the on-site compliance file.
<b>NOTIFICATION TO AUTHORITIES</b>				
31	A written notification of commencement must be given to the Department no later than fourteen (14) days prior to the commencement of the activity. The notice must include a date on which it is anticipated that the activity will commence, as well as a reference number.	2	AVDE was appointed as the independent ECO for this project. Notification of the commencement of construction of this development was communicated with the DFFE on 13 September 2022, 14 days prior to the commencement of construction of authorised activities. Commencement of construction started on 24 October 2022.  Photographic evidence can be found in Annexure C: Photo 3.	It is recommended that the notification letter to the DFFE be kept within the on-site compliance file.
<b>OPERATION OF THE ACTIVITY</b>				
32	A written notification of operation must be given to the Department no later than fourteen (14) days prior to commencement of the activity operational phase.	NA	This condition is not applicable at this stage as the project is currently in construction phase.	LWUA to take cognisance that a notification letter must be sent to the Department no later than fourteen (14) days prior to commencement of operation.
<b>SITE CLOSURE AND DECOMMISSIONING</b>				
33	Should the activity ever cease or become redundant, the holder of the authorisation must undertake the required actions as prescribed by legislation at the time and comply with all relevant legal requirements administered by any relevant and competent authority at that time.	NA	This condition is not applicable at this stage as the activities are currently in the construction phase.	LWUA to take cognisance that is activities cease or become redundant that the required legal actions must be followed.
<b>SPECIFIC CONDITIONS</b>				
34	No activities, which require a water use authorisation, must be allowed to encroach into a water resource without a water use authorisation being in place from the Department of Water and Sanitation.	2	LWUA holds a General Authorisation from the Department of Water and Sanitation dated 12 October 2021, this authorisation allows for activities to take place within the watercourses. A copy of the General Authorisation is kept within the on-site compliance folder. Photographic evidence can be found in Annexure C: Photo 10.	It is recommended that the approved General Authorisation be kept within the on-site compliance file.
35	The micro-siting / pegging of the route for the Lebalelo raw water pipeline must be undertaken prior to commencement with construction activities. This final walk through of the pipeline route must be undertaken by a botanical specialists to identify any protected and endangered plants and trees for a search and rescue operations. The findings of this undertaking must inform the final layout plan per condition 12 and 13 above.	2	At the time of this audit (February 2024) it was confirmed that micro pegging has taken place. Photographic evidence can be found in Annexure C: Photo 14.  The Biodiversity Company undertook a final botanical walkdown on 1 and 2 June 2022. A letter informing the Department of such was sent on 15 June 2022. A protected trees permit was granted by the DFFE on 7 November 2022, Licence LP-SDM - 0004-2022-23. All protected trees have been marked with danger tape and will only be removed if necessary. A record of all protected trees that have been removed was provided to the audit team. At the time of this audit 5 Marula trees have been removed.	It is recommended that the botanical walkdown report and Protect Trees Permit be kept within the on-site compliance file.  It is also recommended that the trees be re-marked with danger tape as some tape have been exposed to weather conditions for quite a while, and is not as visible any longer.

Audit Findings of the Environmental Authorisation				
NR	ENVIRONMENTAL AUTHORISATION CONDITION	COMPLIANCE STATEMENT	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
			Photographic evidence can be found in Annexure C: Photo 15 and 16.	
36	Where the pipeline is planned to be buried all topsoil must be separated from subsoil and stored separately, when backfilled the soil should be replaced in the correct order.	1	Construction activities has been completed on majority of the pipeline route. Portions of the pipeline route which have been recently excavated near the two rivers mine were noted to not separate topsoil and subsoil on site.  Photographic evidence can be found in Annexure C: Photo 17 and 18.	LWUA to take cognisance that topsoil and subsoil must be stored within separate stockpiles and replaced in the correct order.
37	High visibility flags must be placed near any threatened / protected plants in order to avoid any damage or destruction of the species	2	Protected trees were marked at the onset of the construction of the SE2 pipeline route (September/October 2022). In the April and May 2023 audits, it was noted that some of these markers (danger tape) are still visible, but some Marula Trees were observed to be not marked. In the February Audit it was noted that protected trees were clearly marked and no un-marked protected trees were observed  Photographic evidence can be found in Annexure C: Photo 15.	LWUA to take cognisance that any threatened or protected plants need to be flagged to avoid damage or destruction to the species.  It is recommended that another walkdown is undertaken by the Contractor and protected trees/plants clearly marked with high visibility flags/danger tape to ensure that the protected trees/plants are clearly visible.
38	A permit must be obtained from the relevant nature conservation agency for the removal or destruction of indigenous, protected or endangered plant or animal species.	2	The Biodiversity Company undertook a final botanical walkdown on 1 and 2 June 2022. A letter informing the Department of such was sent on 15 June 2022. A protected trees permit was granted by the DFFE on 7 November 2022, Licence LP-SDM - 0004-2022-23. Protected trees have been marked with danger tape at the onset of the construction phase and will only be removed if necessary. A copy of this permit can be found within the on-site compliance file. A record of all protected trees that have been removed was provided to the audit team. At the time of this audit 5 Marula trees have been destroyed. Photographic evidence can be found in Annexure C: Photo 11, 15 and 16.	LWUA to take cognisance that if any additional indigenous, protected or endangered plant or animal is encountered a permit must be applied for the removal or destruction.
39	No exotic plants may be used for rehabilitation purposes. Only indigenous plants of the area may be utilised.	2	At the time of this audit (February 2024) rehabilitation activities have commenced, backfilling of subsoil at specific sections of the pipeline route and natural vegetation was allowed to grow over cleared area.	LWUA to take cognisance that indigenous plants can only be used when rehabilitating the area.
40	If it is not possible to avoid Site LWUA 4, a permit in terms of section 35(4) of the National Heritage Resource Act (NHRA) must be applied from South African Heritage Resource Agency (SAHRA) prior to the commencement of construction activities.	NA	Phase 2 of the project (pipeline from Dwarsrivier Pump Station to Mototolo) has not yet commenced. As the LWUA 4 site is situated on the pipeline route from Dwarsrivier Pump Station to Mototolo, this condition is not applicable for this audit.	None
41	Monitoring reports must be submitted to SAHRA once the construction phase has been completed.	NA	This condition is not applicable at this stage as construction has not been completed.	LWUA to take cognisance that monitoring reports must be submitted to SAHRA once construction has been completed.
42	Identified Burial sites (LWUA 1, 2, 3) must be cleared of vegetation to establish the boundaries of the sites as the possibility of unmarked graves exists.	2	Burial site LWUA 1, Graveyard LWUA 2 and Burial site LWUA 3 has been cleared of vegetation and construction activities are taking place outside the boundary of these sites. LWUA 1 was found to have a headstone that was knocked over. It was confirmed within the Heritage Impact Assessment Report dated August 2021, that this was the condition the site was found in and not a result of construction activities. No unmarked graves were observed during the February audit.	LWUA to take cognisance that graveyards / burial sites should be clearly demarcated as to ensure the areas are not disturbed.

Audit Findings of the Environmental Authorisation				
NR	ENVIRONMENTAL AUTHORISATION CONDITION	COMPLIANCE STATEMENT	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
			Photographic evidence can be found in Annexure C: Photo 19, 20 and 21.	
43	Should any heritage resources, including evidence of graves and human burials, archaeological material and palaeontological material be discovered during the execution of the activities, all works must be stopped immediately, and the SAHRA Burial Grounds and Graves (BGG) Unit must be alerted immediately as per section 36(6) of the NHRA.	2	<p>In June 2023, a complaint was received from the Mokabane Royal Council that graves were disturbed at LWUA 1 due to construction activities. Subsequently, an archaeologist was appointed to assess this claim and a report was prepared. SAHRA (Natasha Higgitt) was informed of this finding on 4 August 2023 with the archaeologist report attached. A newly identified grave was found and ladled SP 12, this grave was 22 meters from the pipeline excavations and no impacts were noted in the report. The grave is demarcated as per the instruction from SAHRA. Photographic evidence can be found in Annexure C: Photo 22 and 23.</p> <p>On 7 August 2023, bones were discovered in the excavation trench at the Steelpoort Industrial Park. At the time of this audit (14 November 2023) an archaeologist has assessed the bones and confirmed they are human remains. SAHRA (Natasha Higgitt) was informed of this finding on 8 August 2023 and the actions implemented on site was confirmed to be sufficient, these include stopping construction in the vicinity and barricade the area.</p> <p>SAHRA has given formal response to the findings on 11 September 2023. The conditions are included in Table 4-4. Subsequently on 9 February 2024 SAHRA released a Final Decision note, indicating that SAHRA is satisfied with the permit report and outcome and that this aspect is now closed by SAHRA. During the February 2023 environmental audit, this area was noted to be completely backfilled and no further construction activities are taking place in this area. Photographic evidence can be found in Annexure C: Photo 24 and 25.</p>	LWUA to take cognisance that should any heritage resources be discovered during excavation activities, all works to be stopped and the SAHRA Burial Grounds and Graves (BGG) Unit must be alerted immediately. LWUA to take cognisance that a restoration permit must be applied for to exhume the bones to the nearest municipal burial ground. This application must be prioritised as the raining season is closer. Should heavy rains occur, the exposed ones might be washed away.
44	Should any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramic's, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, all works must be stopped immediately and the South African Heritage Resources Agency SAHRA must be alerted immediately.	2	<p>In June 2023, a complaint was received from the Mokabane Royal Council that graves were disturbed at LWUA 1 due to construction activities. Subsequently, an archaeologist was appointed to assess this claim and a report was prepared. SAHRA (Natasha Higgitt) was informed of this finding on 4 August 2023 with the archaeologist report attached. A newly identified grave was found and ladled SP 12, this grave was 22 meters from the pipeline excavations and no impacts were noted in the report. The grave is demarcated as per the instruction from SAHRA. Photographic evidence can be found in Annexure C: Photo 22 and 23.</p> <p>On 7 August 2023, bones were discovered in the excavation trench at the Steelpoort Industrial Park. At the time of this audit (14 November 2023) an archaeologist has assessed the bones and confirmed they are human remains. SAHRA (Natasha Higgitt) was informed of this finding on 8 August 2023 and the actions implemented on site was confirmed to be sufficient, these include stopping construction in the vicinity and barricade the area.</p>	LWUA to take cognisance that should any archaeological sites be discovered during excavation activities, all works to be stopped and the SAHRA must be alerted immediately.

Audit Findings of the Environmental Authorisation				
NR	ENVIRONMENTAL AUTHORISATION CONDITION	COMPLIANCE STATEMENT	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
			SAHRA has given formal response to the findings on 11 September 2023. The conditions are included in Table 4-4. Subsequently on 9 February 2024 SAHRA released a Final Decision note, indicating that SAHRA is satisfied with the permit report and outcome and that this aspect is now closed by SAHRA. During the February 2023 environmental audit, this area was noted to be completely backfilled and no further construction activities are taking place in this area. Photographic evidence can be found in Annexure C: Photo 24 and 25.	
45	Construction must include design measures that allow surface and subsurface movement of water along drainage lines so as not to impede natural surface and subsurface flows. Drainage measures must promote the dissipation of storm water run-off.	2	LWUA have a General Authorisation approved by the Department of Water and Sanitation for construction activities within any watercourse or drainage lines. Esor construction provided the audit team with a method statement for working within water resources. This document is titled "Stream / River Crossings" with document number set as MET-ENV-188. This plan will be implemented on site and addresses this condition.	LWUA to take cognisance that drainage measures must promote the dissipation of storm-water run-off on site.
46	An integrated waste management approach must be implemented that is based on waste minimisation and must incorporate reduction, recycling, re-use and disposal where appropriate. Any solid waste must be disposed of at a landfill licensed in terms of Section 20 (b) of the National Environmental Management Waste Act, 2008 (Act No. 59 of 2008).	0	<p>Waste bins were noted as part of this audit.</p> <p><b>Spitskop Pump Station:</b> Waste bins were noted as well as a skip which was covered with a net to prevent waste from being blown away. The signage for the specific waste streams was not clearly marked due to wear and tear, it was indicated that new signs are put in place.</p> <p><b>Pipeline Route:</b> Poor housekeeping was noted along the pipeline route. The observation was specifically around waste stockpiled along the route. It is suggested that all waste be removed from site and disposed of appropriately. During the current audit, rock material that emanated from the excavations were still remained along the pipeline route. It is the intention of the Contractor to procure a crusher and undertaken the crushing of the rock on site and the resultant material will be managed by the appointed crusher management company. No waste bin was noted along the pipeline route at active construction sites and at the Wetland area</p> <p><b>Reservoir Site:</b> A waste bin was noted at the reservoir site which was marked for the specific waste stream. Poor Housekeeping was noted as a work in progress</p> <p><b>Waste Management:</b> Waste is being disposed of at the Steelpoort Industrial Park within waste skips. Steelpoort Industrial Park had a permit to dispose of waste at the Burgersfort Landfill site which was valid until December 2023. An updated agreement was requested by the audit team, this was not provided at the time of this audit.</p> <p>Photographic evidence can be found in Annexure C: Photo 26, 27, 28, 29 and 30.</p>	It is recommended that wheelie bins are provided at each active construction area for waste management, these bins should move as construction takes place to ensure they are readily available. Sandbags are used to support the pipelines that have not yet been installed. Once the pipeline has been installed, the sandbags should be removed from site. It is further recommended that the contractor undertakes toolbox talks on waste management and general house keeping as to ensure all personnel are aware of the procedures in place for waste management on site. A New landfill permit must be obtained.
<b>GENERAL</b>				

Audit Findings of the Environmental Authorisation				
NR	ENVIRONMENTAL AUTHORISATION CONDITION	COMPLIANCE STATEMENT	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
47	A copy of this Environmental Authorisation, the audit and compliance monitoring reports, and the approved EMPr, must be made available for inspection and copying -			
47.1	at the site of the authorised activity;	2	All Environmental Permits, Authorisations and Audit Reports from September 2022, are kept within the on-site compliance folder. Electronic filing of the audit reports are maintained by the Contractor.  Photographic evidence can be found in Annexure C: Photo 8, 9, 10, 11, 12 and 13.	It is recommended that copies of the environmental audit reports (once finalised) as well as proof of submission thereof to the DFFE, be included in the on-site compliance file.
47.2	to anyone on request; and	2	The Environmental Authorisation, EMPr and General Authorisation will be provided via email to anyone on request. No such requests have been made to date at the time of the audit.	LWUA must make a copy of the environmental authorisation, environmental audit reports or EMPr available to any if requested.
47.3	where the holder of the Environmental Authorisation has a website, on such publicly accessible website.	2	LWUA have uploaded the approved Environmental Authorisation, EMPr and the latest environmental audit reports onto their website.( <a href="https://lebalelo.co.za/project-documents/">https://lebalelo.co.za/project-documents/</a> )	LWUA must upload all environmental audit reports onto its website.
48	National government, provincial government, local authorities or committees appointed in terms of the conditions of this authorisation or any other public authority shall not be held responsible for any damages or losses suffered by the holder of the authorisation or his/her successor in title in any instance where construction or operation subsequent to construction be temporarily or permanently stopped for reasons of non-compliance by the holder of the authorisation with the conditions of authorisation as set out in this document or any other subsequent document emanating from these conditions of authorisation.	2	LWUA understands that they are liable for any damage or losses suffered and that this responsibility is not on the Department or any competent authority.	None
<b>Total Compliance</b>		<b>77</b>		
<b>Total Compliance Percentage</b>		<b>96%</b>		



Table 4:2 Audit findings of the EMPr

Audit Findings of the EMPr						
NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
<b>CONSTRUCTION PHASE</b>						
<b>SOILS</b>						
1	Site clearing and preparation Trench excavation and installation of pipeline Construction of reservoir	Loss of soils to compaction and erosion - Conservation of soils a resource	Stockpile the topsoil and sub-soil separately on either side of the trench and backfill in the correct order.	1	Construction activities has been completed on majority of the pipeline route. Portions of the pipeline route which have been recently excavated near the two rivers mine were noted to not separate topsoil and subsoil on site.  Photographic evidence can be found in Annexure C: Photo 17 and 18.	LWUA to take cognisance that all topsoil and subsoil must be stockpiled on either side of the trench and backfilled in the correct order.
2			The first 300 mm of soil must be stockpiled separate from the soil excavated deeper than 300 mm	1	Construction activities has been completed on majority of the pipeline route. Portions of the pipeline route which have been recently excavated near the two rivers mine were noted to not separate topsoil and subsoil on site.  Photographic evidence can be found in Annexure C: Photo 17 and 18.	LWUA to take cognisance that all topsoil and subsoil must be stockpiled separately on either side of the trench and backfilled in the correct order.
3			The proposed pipeline system must be divided up into 100 m intervals. Each interval's soil must be stockpiled and filled back up (in the correct order) to avoid long periods of stockpiling.	1	Construction activities has been completed on majority of the pipeline route. Portions of the pipeline route which have been recently excavated near the two rivers mine were noted to not separate topsoil and subsoil on site.  Photographic evidence can be found in Annexure C: Photo 17 and 18.	None
4			All removed soil and material stockpiles must be protected from erosion, stored on flat areas where run-off will be minimised, and be surrounded by bunds.	2	Most soil stockpiles have been stored on flat areas where run-off will be minimal.  During the December, January, February, March, April, May, June, July, August and September 2023 audits it was observed that topsoil was stockpiled within drainage lines. During this audit (February 2024), no topsoil was found within the drainage line, this was confirmed that the soil was replaced when backfilling activities were undertaken.  Photographic evidence can be found in Annexure C: Photo 31 and 32.	LWUA to take cognisance that stockpiles must be protected from erosion, placed on flat areas and surrounded by bunds
5			The amount of stockpiling of surplus soil material must be limited as far as practically possible, to avoid unnecessary handling of soil resources.	2	Soil Stockpiles are is stored adjacent to the excavations for the pipeline route. Removal of soils is limited to the pipeline route and no other soils have been removed.  Photographic evidence can be found in Annexure C: Photo 17 and 18.	LWUA to take cognisance that stockpiling of surplus soil must be limited as far as possible as to avoid unnecessary handling of soil.
6			Ensure soil stockpiles and concrete / building sand are sufficiently safeguarded against rain wash.	2	During the December, January, February, March, April, May, June, July, August and September 2023 audits it was observed that topsoil was stockpiled within drainage lines. During this audit (February 2024), no topsoil was found within the drainage line, this was confirmed that the soil was replaced when backfilling	LWUA to take cognisance that stockpiling needs to be protected from rain wash.

Audit Findings of the EMPr						
NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
<b>CONSTRUCTION PHASE</b>						
					activities were undertaken. Photographic evidence can be found in Annexure C: Photo 31 and 32.	
7			These designated stockpile areas must be viewed as temporary and kept for backfill material.	2	At the time of this audit (February 2024) backfilling activities have commenced on site at large portions of the pipeline route. Photographic evidence can be found in Annexure C: Photo 18.	LWUA to take cognisance that stockpiles are only temporary and must be used as backfill material.
8			Maintain soil quality and minimise damage to the soil structure during the time the material is stockpiled.	2	Soil stockpiles were intact and no driving has taken place on topsoil stockpiles.  Photographic evidence can be found in Annexure C: Photo 17 and 18.	LWUA to take cognisance that soil quality must be maintained and measures implemented to minimise damage to the soil structure during the time the material is stockpiled.
9			All construction access must make use of the existing roads that can be found in and around the project area.	2	Access to the Spitskop Pump Station and the Pipeline Route is done using existing roads. Construction activities along the pipeline route is done within the pipeline servitude. No new roads were identified at the time of this audit (February 2024).  Photographic evidence can be found in Annexure C: Photo 33.	LWUA to take cognisance that existing roads must be used.
10			Compacted areas are to be ripped to loosen the soil structure where necessary.	2	During this audit (February 2024), some compacted areas on the pipeline route have been ripped to loosen the soil. Rehabilitation activities have commenced such as backfilling of subsoil at specific sections of the pipeline route and natural vegetation was allowed to grow over cleared area.	LWUA to take cognisance that compacted areas must be ripped to loosen the soil.
11			Implement appropriate stormwater management measures, including the temporary diversion of upstream run-off from the construction and laydown areas.	2	Esor construction have a stormwater management plan that was provided to the audit team. This document is titled "Stormwater Management" with document number set as MET-ENV-015. This plan will be implemented on site.	LWUA to take cognisance that compacted areas must be ripped to loosen the soil.
12			Concurrent rehabilitation must be carried out rather than full rehabilitation after construction.	2	At the time of this audit (February 2024) rehabilitation activities have commenced on site, such as backfilling of subsoil at specific sections of the pipeline route and natural vegetation was allowed to grow over cleared area.	LWUA to take cognisance that concurrent rehabilitation must be implemented.
13			Ensure topsoil is spread back over trench area on closure of the trench. It is preferred that the trench is created on a needs basis to avoid an excessive excavation. As pipe is laid, the trench must be backfilled and topsoil replaced.	2	At the time of this audit (February 2024) backfilling is being undertaken once a successful pump test is received. Backfilling has been undertaken at the pipeline portion from Lion Smelter to the Tweefontein Tailings Dam and from pipe jack two to the end of the wetland area. The only areas not backfilled as part of this pipeline portion is where a man hole is being constructed, and where the pipeline is being placed at the Tweefontein tailings dam and at the Two Rivers Mine.  Photographic evidence can be found in Annexure C: Photo 18.	LWUA to take cognisance that upon closure of the section of the trench topsoil must be returned.
14			Landscape and lightly till (no deeper than 30 cm) denuded areas to encourage vegetation establishment as soon as possible.	2	At the time of this audit (February 2024) rehabilitation activities have commenced on site, such as backfilling of subsoil at specific sections of the pipeline route and natural vegetation was allowed to grow over cleared area.	LWUA to take cognisance that upon closure landscaping must be implemented to encourage vegetation growth.
15	Trench excavation and installation of pipeline  Construction of reservoir	Contamination of soils due to spilled concrete or hydrocarbons  -	All machinery and equipment should be inspected regularly for faults and possible leaks, these should be serviced off-site.	2	All machinery is inspected at the beginning of each day for faults or leaks. If any leaks are detected they will be serviced within the laydown area at the Steelport Industrial Park. This area has a concrete floor which will ensure no environmental pollution occurs. Drip trays were noted to be placed under some equipment	LWUA to take cognisance that all machinery and equipment need to undergo regular inspections.

Audit Findings of the EMPr						
NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
<b>CONSTRUCTION PHASE</b>						
		Conservation of soils a resource			on site however some generators/pumps were noted to be operated without drip trays. Photographic evidence can be found in Annexure C: Photo 34.	
16			A hydrocarbon spill management plan must be put in place to ensure that should there be any chemical spill out or over that it does not run into the surrounding areas.	1	Esor construction have a spill management plan that was provided to the audit team. This document is title "Storage and use of Fuel Hazardous Poisonous Substance" with document number set as MET-ENV-017.  During this audit undertaken in February 2024, a spill kit could be found at the current construction site at Spitskop Pump Station, and at the Reservoir Site.  A spill of an unknown substance was observed at the Reservoir during the February Audit. It was indicated that this needs to be managed as per the spill management plan in place.  Photographic evidence can be found in Annexure C: Photo 36.	All spills to be treated with the spill kit and contaminated soil disposed of at a licenced landfill site.  The contractor must ensure the spill kit is available at all times and must not be used as a waste bin.
17			The Contractor shall be in possession of an emergency spill kit that must always be complete and available on site.	2	Esor construction have a spill management plan that was provided to the audit team. This document is title "Storage and use of Fuel Hazardous Poisonous Substance" with document number set as MET-ENV-017.  During this audit undertaken in February 2024, a spill kit could be found at the current construction site at Spitskop Pump Station, and at the Reservoir Site.  Photographic evidence can be found in Annexure C: Photo 36.	LWUA to take cognisance that all an emergency spill kit that must always be complete and available on site.
18			Any fuel, oil or hazardous substance spills must be cleaned-up immediately and discarded correctly.	0	LWUA understands that any hazardous spill must be cleaned-up immediately using the spill-kit found on site, utilising the Spill Management Plan in place for the site.  During this audit undertaken in February 2024, a spill kit could be found at the current construction site at Spitskop Pump Station, and at the Reservoir Site.  A spill of an unknown substance was observed at the Reservoir during the February Audit. It was indicated that this needs to be managed as per the spill management plan in place.  Photographic evidence can be found in Annexure C: Photo 36.	LWUA to take cognisance that an if any hazardous substance is spilt it must be cleaned up immediately.
19			Drip trays or any form of oil absorbent material must be placed underneath vehicles/machinery and equipment when not in use. All contaminated soil / yard stone shall be treated in situ or removed and be placed in containers.	0	During this audit undertaken in February 2024, a spill kit could be found at the current construction site at Spitskop Pump Station, and at the Reservoir Site. A spill of an unknown substance was observed at the Reservoir during the February Audit. It was indicated that this needs to be managed as per the spill management plan in place. Photographic evidence can be found in Annexure C: Photo 34 and 35.	LWUA to take cognisance that drip trays or any form of oil absorbent material must be placed underneath vehicles/machinery and equipment when not in use. Drip-Trays must be appropriately stored as to ensure no contamination to the environment.
<b>BIODIVERSITY: FAUNA AND FLORA</b>						
20	Vegetation clearing and site preparation	Destruction, fragmentation and degradation	Demarcate the footprint area with high visibility plastic fencing.	2	During the audit undertaken in February 2024 it was observed that all active construction sites have been demarcated with high visibility orange and yellow barrier netting.	LWUA to take cognisance that the footprint area must be demarcate with high visibility plastic fencing.

Audit Findings of the EMPr						
NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
<b>CONSTRUCTION PHASE</b>						
		of habitats -			Photographic evidence can be found in Annexure C: Photo 33 and 36.	
21		Limit the disturbance and destruction of vegetation, fauna and habitat	Restrict the disturbance footprint to within the designated pipeline route.	2	During the audit undertaken in February 2024 it was observed that micro-pegs have been placed along the pipeline route as to ensure all activities only take place in designated areas. Photographic evidence can be found in Annexure C: Photo 14 and 33.	LWUA to take cognisance that the footprint area must be restricted to within the designated pipeline route.
22			Existing access routes, especially roads must be made use of.	2	Access to the Spitskop Pump Station and the Pipeline Route is done using existing roads. Construction activities along the pipeline route is done within the pipeline servitude. No new roads were identified at the time of this audit (February 2024). Photographic evidence can be found in Annexure C: Photo 33.	LWUA to take cognisance that existing access routes, especially roads must be made use of.
23			All laydown, chemical toilets etc. should be restricted to low sensitivity areas. Any materials may not be stored for extended periods of time and must be removed from the project area once the construction phase has been concluded. No permanent construction phase structures should be permitted. No storage of vehicles or equipment will be allowed outside of the designated project areas.	2	All laydown areas and chemical toilets observed were found to be located outside sensitive areas. Photographic evidence can be found in Annexure C: Photo 37 and 38.	LWUA to take cognisance that the laydown area, chemical toilets etc. should be restricted to low sensitivity areas.
24			Areas that are denuded during construction need to be re-vegetated with indigenous vegetation to prevent erosion during flood and wind events. This will also reduce the likelihood of encroachment by alien invasive plant species. All livestock must always be kept out of the project area, especially areas that have been recently re-planted	2	At the time of this audit rehabilitation activities have commenced on site. The natural vegetation was left to grow over the rainy season and alien invasive species were noted within the regrowth. It was advised that the Alien and Invasive species are removed along areas which have been left to naturally re-vegetate.	LWUA to take cognisance that areas that are denuded during construction need to be re-vegetated with indigenous vegetation.
25			Progressive rehabilitation as the construction of the pipeline continues as well as any cleared areas will enable topsoil to be returned more rapidly, thus ensuring more recruitment from the existing seedbank	2	At the time of this audit rehabilitation activities have commenced on site. The natural vegetation was left to grow over the rainy season and alien invasive species were noted within the regrowth. It was advised that the Alien and Invasive species are removed along areas which have been left to naturally re-vegetate.	LWUA to take cognisance that progressive rehabilitation needs to be implemented on site.
26			A hydrocarbon spill management plan must be put in place to ensure that should there be any chemical spill out or over that it does not run into the surrounding areas. The Contractor shall be in possession of an emergency spill kit that must always be complete and available on site. Drip trays or any form of oil absorbent material must be placed underneath vehicles/machinery and equipment when not in use. No servicing of equipment on site unless necessary. All contaminated soil / yard stone shall be treated in situ or removed and be placed in containers. Appropriately contain any generator diesel storage tanks, machinery spills (e.g. accidental spills of hydrocarbons oils, diesel etc.) in such a way as to prevent them leaking and entering the environment. Construction activities and vehicles could cause spillages of lubricants, fuels and waste material potentially negatively affecting the functioning of the ecosystem. All	1	Esor construction have a spill management plan that was provided to the audit team. This document is titled "Storage and use of Fuel Hazardous Poisonous Substance" with document number set as MET-ENV-017. During this audit undertaken in February 2024, a spill kit could be found at the current construction site at Spitskop Pump Station, and at the Reservoir Site. It was observed that drip trays are placed under some equipment on site, however some generators/pumps were noted to be operated without drip trays. A spill of an unknown substance was observed at the Reservoir during the February Audit. It was indicated that this needs to be managed as per the spill management plan in place. The chemical storage cage at the Spitskop Pumpstation was found to be locked and an MSDS sheet is kept on site to keep a record of all chemicals stored and used. Safety signages are clearly visible on the cage. Photographic evidence can be found in Annexure C: Photo 34, 35, 39 and 40.	LWUA to take cognisance that a hydrocarbon spill management plan must be implemented. A spill kit must be kept on site for emergencies. Drip trays must be placed under all equipment when not in use and no servicing or re-fuelling to take place in the project areas. Store all diesel or hazardous material within bounded areas.

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NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
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			vehicles and equipment must be maintained, and all re-fuelling and servicing of equipment is to take place in demarcated areas outside of the project area.			
27			It should be made an offence for any staff to take/ bring any plant species into/out of any portion of the project area. No plant species whether indigenous or exotic should be brought into/taken from the project area, to prevent the spread of exotic or invasive species or the illegal collection of plants.	2	LWUA understand that no plant species may be brought into or taken out of the project area.	LWUA to take cognisance that no plant species whether indigenous or exotic should be brought into/taken from the project area.
28			A fire management plan needs to be complied in terms of the National Veld and Forest Fire Act, 101 of 1998, and implemented to restrict the impact fire might have on the surrounding areas. The following preventative measures must be included: <ul style="list-style-type: none"> <li>Adherence to the daily fire danger ratings</li> <li>Must have equipment, protective clothing and trained personnel for extinguishing fires</li> <li>No lighting, using or maintain a fire in the open air unless in the designated place</li> <li>Contractors must do everything in their power to stop the spread of veld fires during the installation of water pipes.</li> </ul>	2	Esor construction have a fire management plan that was provided to the audit team. This document is titled "Fire Control" with document number set as MET-OPS-046. This condition is addressed within this fire management plan. During the audit undertaken in February 2024 fire extinguishers were found at the Spitskop Pump Station, reservoir as well as along the pipeline route. The site undertakes Fire Extinguisher Training, proof of such was provided to the audit team. Photographic evidence can be found in Annexure C: Photo 41 and 42.	LWUA to take cognisance that a fire management plan needs to be complied in terms of the National Veld and Forest Fire Act, 101 of 1998, and implemented to restrict the impact fire might have on the surrounding areas.
29			Reduce the disturbance footprint and the unnecessary clearing of vegetation on either side of the trench as far as possible.	2	Approval was granted for the clearance of a corridor area of 25m (inclusive of the servitude). Currently approximately a 17m corridor is cleared for construction of the pipeline.	None
30		Loss of protected plant and tree species - Limit the disturbance and destruction of vegetation, fauna and habitat	A pre-construction walkdown in the flowering season (October -March) should be conducted as part of a search and rescue operation. A suitable service provider (i.e. botanist) must be responsible for the removal of the threatened plants after which they must be utilised in the rehabilitation process. All protected trees identified should be marked and counted, including their seedlings and protected trees in the nearby. Damaging of protected trees during construction must be avoided. Relocation/transplanting of protected trees is highly recommended. Application listing all affected protected tree species and how they are affected by the proposed project, must be made with the Department of Forestry, Fisheries and the Environment (DFFE). An environmental workshop must be conducted to all contractors working in the project (Environmental Awareness Plan).	2	The Biodiversity Company completed a final botanical walkdown on 1 and 2 June 2022. A letter informing the Department of such was sent on 15 June 2022. A protected trees permit was granted by the DFFE on 7 November 2022, Licence LP-SDM - 0004-2022-23. All protected trees have been marked with danger tape and will only be removed if necessary. A copy of this permit can be found within the on-site compliance file. A record of all protected trees that have been removed was provided to the audit team. At the time of this audit 5 Marula trees have been destroyed. AvDE conducted Environmental Awareness Training with Esor Construction during the pre-construction audit on 16 September 2022. This training looked at all of the EMPr conditions and how they must be implemented on site. The contractors were instructed that Environmental Training will need to be undertaken for all workers on the project. All new personnel employed by this project undergo Environmental Induction with the ESOR Construction/ Safety officer Alexzine Nortje. Mrs Nortje also serves as the Contractors Environmental Officer on site. Photographic evidence can be found in Annexure C: Photo 4, 5, 6, 11, 15 and 16.	LWUA to take cognisance that a walk down must be implemented prior to any construction activities. No protected trees may be damaged or removed unless a permit has been granted by the DFFE. If any tree are removed they should be re-planted or relocated to an area with a similar habitat to encourage resprouting and flourish again.
31			Any individual of the threatened/protected plants that are present needs a relocation or destruction permit in order for any individual that may be removed or destroyed due to the development. High visibility flags must be placed near any threatened/protected plants in	2	A protected trees permit was granted by the DFFE on 7 November 2022, Licence LP-SDM - 0004-2022-23. All protected trees have been marked with danger tape and will only be removed if necessary. A copy of this permit can be found within the on-site compliance file.	LWUA to take cognisance that a walk down must be implemented prior to any construction activities. No protected trees may be damaged or removed unless a permit has been granted by the DFFE. If any trees are removed they should

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NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
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			order to avoid any damage or destruction of the species. If left undisturbed the sensitivity and importance of these species needs to be part of the environmental awareness program. Infrastructure, development areas and routes where protected plants cannot be avoided, these plants many being geophytes or small succulents should be removed from the soil and relocated/ re-planted in similar habitats where they should be able to resprout and flourish again. All protected and red-data plants should be relocated, and as many other geophytic species as possible.		A record of all protected trees that have been removed was provided to the audit team. At the time of this audit 5 Marula trees have been destroyed.  AvDE conducted Environmental Awareness Training with Esor Construction during the pre-construction audit on 16 September 2022. This training looked at all of the EMPr conditions and how they must be implemented on site. The contractors were instructed that Environmental Training will need to be undertaken for all workers on the project. All new personnel employed by this project undergo Environmental Induction with the ESOR Construction/ Safety officer Alexzine Nortje. Mrs Nortje also serves as the Contractors Environmental Officer on site. Photographic evidence can be found in Annexure C: Photo 4, 5, 6, 11, 15 and 16.	be re-planted or relocated to an area with a similar habitat to encourage resprouting and flourish again.
32			Any individual of the nationally protected trees or protected plants that were observed needs a relocation or destruction permit that will be required for any individual that may be removed or destroyed due to the development, alternatively the trees/plants can be relocated within the property without a permit or otherwise left unharmed. High visibility flags must be placed near any protected trees/plants.	2	A protected trees permit was granted by the DFFE on 7 November 2022, Licence LP-SDM - 0004-2022-23. All protected trees have been marked with danger tape and will only be removed if necessary. A copy of this permit can be found within the on-site compliance file. A record of all protected trees that have been removed was provided to the audit team. At the time of this audit 5 Marula trees have been destroyed. Photographic evidence can be found in Annexure C: Photo 11, 15 and 16.	LWUA to take cognisance that any individual of the nationally protected trees or protected plants that were observed needs a relocation or destruction permit in order to be removed or destroyed.
33			Areas that are denuded during construction need to be re-vegetated with indigenous vegetation to prevent erosion during flood events. This will also reduce the likelihood of encroachment by alien invasive plant species.	2	During the February 2024 audit, it was observed that natural vegetation was left to grow over the rainy season along various parts of the pipeline route.	LWUA to take cognisance that any area that was denuded during construction need to be re-vegetated with indigenous vegetation to prevent erosion during flood events.
34			The footprint area of the construction should be kept to a minimum. The footprint area must be clearly demarcated to avoid unnecessary disturbances to adjacent areas. Footprint of the roads must be kept to prescribed widths.	2	Approval was granted for the clearance of a corridor area of 25m (inclusive of the servitude). Currently approximately a 17m corridor is cleared for construction of the pipeline.	None
35	Vegetation clearing and site preparation  Trench excavation and installation of pipeline  Construction of reservoir	Spread and/or establishment of alien and/or invasive species  -  Minimise and prevent the spread of alien and/or invasive species	Waste management must be a priority and all waste must be collected and stored adequately. It is recommended that all waste be removed from site on a weekly basis to prevent rodents and pests entering the site	0	Waste bins were noted as part of this audit. <b>Spitskop Pump Station:</b> Waste bins were noted as well as a skip which was covered with a net to prevent waste form being blown away. The signage for the specific waste streams was not clearly marked due to ware and tear, it was indicated that new signs are put in place.  <b>Pipeline Route:</b> Poor housekeeping was noted along the pipeline route. The observation was specifically around waste stockpiled along the route. It is suggested that all waste be removed from site and disposed of appropriately.  During the current audit, rock material that emanated from the excavations were still remained along the pipeline route. It is the intention of the Contractor to procure a crusher and undertaken the crushing of the rock on site and the resultant material will be managed by the appointed crusher management company.	LWUA to take cognisance that the site must implement a Waste Management Plan. All waste must be collected and stored adequately. It is recommended that all waste be removed from site on a weekly basis to prevent rodents and pests entering the site

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NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
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					<p>No waste bin was noted along the pipeline route at active construction sites and at the Wetland area</p> <p><b>Reservoir Site:</b> A waste bin was noted at the reservoir site which was marked for the specific waste stream. Poor Housekeeping was noted as a work in progress</p> <p><b>Waste Management:</b> Waste is being disposed of at the Steelpoort Industrial Park within waste skips. Steelpoort Industrial Park had a permit to dispose of waste at the Burgersfort Landfill site which was valid until December 2023. An updated agreement was requested by the audit team, this was not provided at the time of this audit.</p> <p>Photographic evidence can be found in Annexure C: Photo 26, 27, 28, 29 and 30.</p>	
36			Compilation of and implementation of an alien vegetation management plan.	1	<p>Esor construction have an alien plant clearing plan that was provided to the audit team. This document is title "Alien Plant Clearing" with document number set as MET-ENV-026.</p> <p>During the audit undertaken in February 2024 Alien and Invasive species were found along the pipeline route as well as at the Spitskop Pump Station.</p> <p>Photographic evidence can be found in Annexure C: Photo 44.</p>	LWUA to take cognisance that compilation of and implementation of an alien vegetation management plan. All alien invasive species shall be cleared from site and disposed off at a landfill registered to handle such waste.
37			A pest control plan must be put in place and implemented; it is imperative that poisons not be used. Opt for manual removal.	2	Esor construction have a waste control and management plan that was provided to the audit team. This document is titled "Waste Control and Management" with document number set as MET-ENV-008. This condition is addressed within this waste control and management plan.	LWUA to take cognisance that a pest control plan must be put in place and implemented.
38	Vegetation clearing and site preparation  Trench excavation and installation of pipeline  Construction of reservoir, solar panels, and new pump stations	Displacement of faunal community due to habitat loss, direct mortalities and disturbance (road collisions, noise, dust, vibration and poaching)  - Limit the disturbance and destruction of vegetation, fauna and habitat	A qualified environmental control officer must be on site when construction begins. A site walk through is recommended by a suitably qualified ecologist prior to any construction activities, preferably during the wet season and any SSC should be noted. In situations where the threatened and protected plants must be removed, the proponent may only do so after the required permission/permits have been obtained in accordance with national and provincial legislation. In the above mentioned situation the development of a search, rescue and recovery program is suggested for the protection of these species. Should animals not move out of the area on their own relevant specialists must be contacted to advise on how the species can be relocated.	2	<p>The Biodiversity Company completed a final botanical walkdown on 1 and 2 June 2022. A letter informing the Department of such was sent on 15 June 2022.</p> <p>A protected trees permit was granted by the DFFE on 7 November 2022, Licence LP-SDM - 0004-2022-23.</p> <p>All protected trees have been marked with danger tape and will only be removed if necessary. A copy of this permit can be found within the on-site compliance file.</p> <p>A record of all protected trees that have been removed was provided to the audit team. At the time of this audit 5 Marula trees have been destroyed.</p> <p>A pre-construction audit was undertaken by AvDE on the 18 September 2022.</p> <p>Photographic evidence can be found in Annexure C: Photo 4, 11, 15 and 16.</p>	LWUA to take cognisance that a site walk done must be undertaken prior to construction. No threated or protected trees may be removed or relocated without a protected trees permit granted by the DFFE. Should animals not move out of the area on their own relevant specialists must be contacted to advise on how the species can be relocated.
39			The areas to be developed must be specifically demarcated to prevent movement of staff or any	2	LWUA understands that construction activities must be limited to the demarcated footprint areas. During the audit undertaken in February 2024, it was observed that footprint area are being	LWUA to take cognisance that areas to be developed must be specifically demarcated to

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NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
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			individual into the surrounding environments, · Signs must be put up to enforce this		marked with high visibility orange and yellow barrier netting and micro-pegs as to limit the disturbance areas. Adequate signage was found around the construction activities. Photographic evidence can be found in Annexure C: Photo 14, 33, 36, 45 and 46.	prevent movement of staff or any individual into the surrounding environments.
40			The duration of the construction should be minimised to as short term as possible, to reduce the period of disturbance on fauna.	2	The construction period was planned for a period of one year, construction commenced on 27 September 2022. All effort will be made to conclude the construction activities within the year, however construction activities is subject to specific limitations such as rain delays, community issues and rocky areas. Construction activities is planned to be completed by end March 2024.	LWUA to take cognisance that the duration of the construction should be minimised to as short term as possible.
41			Noise must be kept to an absolute minimum during the evenings and at night to minimize all possible disturbances to amphibian species and nocturnal mammals	2	No construction activities are currently taking place during night time. Working hours are from 07:00 - 16:30 Monday to Friday.	LWUA to take cognisance that noise must be kept to an absolute minimum during the evenings and at night to minimize all possible disturbances to amphibian species and nocturnal mammals.
42			No trapping, killing, or poisoning of any wildlife is to be allowed.	2	No trapping, killing or poisoning of any wildlife was observed during the site visit.	LWUA to take cognisance that no trapping, killing, or poisoning of any wildlife is to be allowed.
43			Any holes/deep excavations must be dug and planted in a progressive manner and shouldn't be left open overnight; Should the holes overnight they must be covered temporarily to ensure no small fauna species fall in.	2	Where applicable holes are covered. Access control is evident on site to prevent public and animal access. Excavation activities are demarcated with high visibility orange and yellow barrier netting. Deep holes has been excavated at the man hole locations, pipejacking areas and Reservoir site. This area is accessed controlled and the area is demarcated with high visibility barrier netting. Photographic evidence can be found in Annexure C: Photo 33, 36 and 49.	LWUA to take cognisance that any holes/deep excavations shouldn't be left open overnight should the holes stay overnight they must be covered temporarily to ensure no small fauna species fall in.
44			All construction and maintenance motor vehicle operators should undergo an environmental induction that includes instruction on the need to comply with speed limits, to respect all forms of wildlife. Speed limits must still be enforced to ensure that road killings and erosion is limited	2	AvDE conducted Environmental Awareness Training with Esor Construction during the pre-construction audit on 16 September 2022. This training looked at all of the EMPr conditions and how they must be implemented on site. The contractors were instructed that Environmental Training will need to be undertaken for all workers on the project. Proof of this training was provided to the audit team. It was also confirmed that a copy of the EMPr is included within the contactor packs even to all personnel working on the site. As access to all construction activities is via existing roads, the speed limits set for these roads are adhered to. Photographic evidence can be found in Annexure C: Photo 4, 5 and 6.	LWUA to take cognisance that all construction and maintenance motor vehicle operators should undergo an environmental induction.
45	Vegetation clearing and site preparation Trench excavation and installation of pipelineConstruction of reservoir	Introduction of nuisance vectors (pests) such as flies, rodents and baboons - Limit the disturbance	Ensure the correct handling, storage and operation of general waste generated on the construction site.	1	Waste bins were noted as part of this audit. <b>Spitskop Pump Station:</b> Waste bins were noted as well as a skip which was covered with a net to prevent waste form being blown away. The signage for the specific waste streams was not clearly marked due to ware and tear, it was indicated that new signs are put in	LWUA to take cognisance that the contactor ensures the correct handling, storage and operation of general waste generated on the construction site.



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NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
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		and destruction of vegetation, fauna and habitat			<p>place.</p> <p><b>Pipeline Route:</b>            Poor housekeeping was noted along the pipeline route. The observation was specifically around waste stockpiled along the route. It is suggested that all waste be removed from site and disposed of appropriately.</p> <p>During the current audit, rock material that emanated from the excavations were still remained along the pipeline route. It is the intention of the Contractor to procure a crusher and undertaken the crushing of the rock on site and the resultant material will be managed by the appointed crusher management company.</p> <p>No waste bin was noted along the pipeline route at active construction sites and at the Wetland area</p> <p><b>Reservoir Site:</b>            A waste bin was noted at the reservoir site which was marked for the specific waste stream. Poor Housekeeping was noted as a work in progress</p> <p><b>Waste Management:</b>            Waste is being disposed of at the Steelpoort Industrial Park within waste skips. Steelpoort Industrial Park had a permit to dispose of waste at the Burgersfort Landfill site which was valid until December 2023. An updated agreement was requested by the audit team, this was not provided at the time of this audit.</p> <p>Photographic evidence can be found in Annexure C: Photo 26, 27, 28, 29 and 30.</p>	
46			A minimum of one toilet must be provided per 10 persons. Portable toilets must be pumped dry to ensure the system does not degrade over time and spill into the surrounding area	1	<p>There are ablution facilities at the Steelpoort Industrial Park, and chemical toilets are available at the Spitskop Pump Station and Reservoir Site. No chemical toilets were observed along the pipeline route currently being constructed. LWUA is advised that chemical toilets should be moved daily with construction activities and must be located outside sensitive areas. The ablution facilities are serviced on a weekly basis by Talisman Hire. Proof of these services was provided to the audit team. Photographic evidence can be found in Annexure C: Photo 37 and 49.</p>	LWUA to take cognisance that a minimum of one toilet must be provided per 10 persons. Portable toilets must be pumped dry to ensure the system does not degrade over time and spill into the surrounding area.
47			The Contractor should supply sealable and properly marked domestic waste collection bins and all solid waste collected shall be disposed of at a licensed disposal facility. Waste management must be a priority and all waste must be collected and stored effectively.	1	<p>Waste bins were noted as part of this audit.</p> <p><b>Spitskop Pump Station:</b>            Waste bins were noted as well as a skip which was covered with a net to prevent waste from being blown away. The signage for the specific waste streams was not clearly marked due to wear and tear, it was indicated that new signs are put in place.</p> <p><b>Pipeline Route:</b>            Poor housekeeping was noted along the pipeline route. The observation was specifically around waste stockpiled along the route. It is suggested that all waste be removed from site and</p>	LWUA to take cognisance that a waste management plan must be implemented.

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<b>CONSTRUCTION PHASE</b>						
					<p>disposed of appropriately.</p> <p>During the current audit, rock material that emanated from the excavations were still remained along the pipeline route. It is the intention of the Contractor to procure a crusher and undertaken the crushing of the rock on site and the resultant material will be managed by the appointed crusher management company.</p> <p>No waste bin was noted along the pipeline route at active construction sites and at the Wetland area</p> <p><b>Reservoir Site:</b></p> <p>A waste bin was noted at the reservoir site which was marked for the specific waste stream. Poor Housekeeping was noted as a work in progress</p> <p><b>Waste Management:</b></p> <p>Waste is being disposed of at the Steelpoort Industrial Park within waste skips. Steelpoort Industrial Park had a permit to dispose of waste at the Burgersfort Landfill site which was valid until December 2023. An updated agreement was requested by the audit team, this was not provided at the time of this audit.</p> <p>Photographic evidence can be found in Annexure C: Photo 26, 27, 28, 29 and 30.</p>	
48			Where a registered disposal facility is not available close to the project area, the Contractor shall provide a method statement with regard to waste management. Under no circumstances may domestic waste be burned on site.	2	Esor construction have a waste control and management plan that was provided to the audit team. This document is title "Waste Control and Management" with document number set as MET-ENV-008.	LWUA to take cognisance that where a registered disposal facility is not available close to the project area, the Contractor shall provide a method statement with regard to waste management.
49			Refuse bins will be emptied and secured. Temporary storage of domestic waste shall be in covered waste skips. Maximum domestic waste storage period will be 10 days.	1	<p>Waste bins were noted as part of this audit.</p> <p><b>Spitskop Pump Station:</b></p> <p>Waste bins were noted as well as a skip which was covered with a net to prevent waste form being blown away.</p> <p>The signage for the specific waste streams was not clearly marked due to ware and tear, it was indicated that new signs are put in place.</p> <p><b>Pipeline Route:</b></p> <p>Poor housekeeping was noted along the pipeline route. The observation was specifically around waste stockpiled along the route. It is suggested that all waste be removed from site and disposed of appropriately.</p> <p>During the current audit, rock material that emanated from the excavations were still remained along the pipeline route. It is the intention of the Contractor to procure a crusher and undertaken the crushing of the rock on site and the resultant material will be managed by the appointed crusher management company.</p> <p>No waste bin was noted along the pipeline route at active construction sites and at the Wetland area</p> <p><b>Reservoir Site:</b></p>	LWUA to take cognisance that refuse bins will be emptied and secured. Temporary storage of domestic waste shall be in covered waste skips. Maximum domestic waste storage on site should not be longer than 10 days.

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NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
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					<p>A waste bin was noted at the reservoir site which was marked for the specific waste stream. Poor Housekeeping was noted as a work in progress</p> <p><b>Waste Management:</b> Waste is being disposed of at the Steelpoort Industrial Park within waste skips. Steelpoort Industrial Park had a permit to dispose of waste at the Burgersfort Landfill site which was valid until December 2023. An updated agreement was requested by the audit team, this was not provided at the time of this audit.</p> <p>Photographic evidence can be found in Annexure C: Photo 26, 27, 28, 29 and 30.</p>	
50			Remove general waste generated frequently as to prevent the development of a breeding habitat for nuisance pests such as flies and attracting rodents and baboons.	1	<p>Waste bins were noted as part of this audit.</p> <p><b>Spitskop Pump Station:</b> Waste bins were noted as well as a skip which was covered with a net to prevent waste form being blown away. The signage for the specific waste streams was not clearly marked due to ware and tear, it was indicated that new signs are put in place.</p> <p><b>Pipeline Route:</b> Poor housekeeping was noted along the pipeline route. The observation was specifically around waste stockpiled along the route. It is suggested that all waste be removed from site and disposed of appropriately. During the current audit, rock material that emanated from the excavations were still remained along the pipeline route. It is the intention of the Contractor to procure a crusher and undertaken the crushing of the rock on site and the resultant material will be managed by the appointed crusher management company. No waste bin was noted along the pipeline route at active construction sites and at the Wetland area</p> <p><b>Reservoir Site:</b> A waste bin was noted at the reservoir site which was marked for the specific waste stream. Poor Housekeeping was noted as a work in progress</p> <p><b>Waste Management:</b> Waste is being disposed of at the Steelpoort Industrial Park within waste skips. Steelpoort Industrial Park had a permit to dispose of waste at the Burgersfort Landfill site which was valid until December 2023. An updated agreement was requested by the audit team, this was not provided at the time of this audit.</p> <p>No development of a breeding habitat for nuisance pests was observed during this audit (November 2023).</p>	LWUA to take cognisance that general waste generated must be removed frequently as to prevent the development of a breeding habitat for nuisance pests such as flies and attracting rodents and baboons.

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NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
<b>CONSTRUCTION PHASE</b>						
					Photographic evidence can be found in Annexure C: Photo 26, 27, 28, 29 and 30.	
<b>SURFACE WATER AND WETLANDS</b>						
51	Vegetation clearing and site preparation  Trench excavation and installation of pipeline	Direct loss, disturbance and degradation of wetlands  - Minimise the potential for surface water pollution  Limit the disturbance and destruction of delineated wetlands	Restrict all construction related activities to within the designated pipeline route.	2	At the time of this audit (February 2024) it was confirmed that micro pegging of the route has been undertaken as to demarcate the footprint area.  Photographic evidence can be found in Annexure C: Photo 14.	LWUA to take cognisance that all construction related activities must be restricted to within the designated pipeline route.
52			Use wetland spatial data (shapefiles) to mark out the positions where the pipeline will enter and exit the 15 m buffer on the boundary of a wetland. Indicate delineated wetlands on site layout plans.	2	Esor construction have a river crossing method plan that was provided to the audit team. This document is title "Stream / River Crossing" with document number set as MET-ENV-188.  At the time of this audit the wetland area and associated 15m buffer area was not clearly demarcated since construction activities have been completed within the wetland area.	LWUA to take cognisance that the site must use wetland spatial data (shapefiles) to mark out the positions where the pipeline will enter and exit the 15 m buffer on the boundary of a wetland.
53			Adhere to the prescribed wetland buffers for secondary activities. Restrict all secondary activities (e.g. laydown yards, storage areas, cement mixing and equipment) to outside of wetlands and their prescribed buffers.	2	During this audit undertaken in February 2024, no activities were undertaken within the wetland area. The lay-down area is situated outside the 15 m buffer area of the wetland  Photographic evidence can be found in Annexure C: Photo 43.	LWUA to take cognisance that the site must restrict all secondary activities (e.g. laydown yards, storage areas, cement mixing and equipment) to outside of wetlands and their prescribed buffers.
54			Signpost the area beyond the construction footprint where the pipeline traverses the wetlands as an environmentally sensitive area and keep all excavation, soil stockpiling, general access and construction activities out of this area.	2	During this audit undertaken in February 2024, no activities were undertaken within the wetland area. The lay-down area is situated outside the 15 m buffer area of the wetland  Photographic evidence can be found in Annexure C: Photo 43.	LWUA to take cognisance that a signpost of the area beyond the construction footprint where the pipeline traverses the wetlands as an environmentally sensitive area must be implemented.
55			Demarcate the 15 m buffer zone around wetlands on the ground (e.g. painted wooden poles/high visibility plastic fencing).	2	The wetland area is not clearly demarcated and associated 15m buffer area was not clearly marked as construction activities have been completed. Photographic evidence can be found in Annexure C: Photo 43.	LWUA to take cognisance that the 15 meter buffer zone of the wetlands must be demarcated on the ground.
56			Reduce the disturbance footprint and the unnecessary clearing of vegetation on either side of the trench as far as possible when traversing wetlands.	0	During the audit undertaken in July, August, September, October, November, December 2023, January 2024 and this audit (February 2024) it was observed that micro-pegs have been placed along the pipeline route as to ensure all activities only take place in designated areas.  Construction activities started within the buffer or boundary of the wetland in July 2023, however the clearance of vegetation was measures as approximately 30 m. The EMPr states that clearance of vegetation must be limited to a 25m corridor along the pipeline route, and 15m (servitude) in the wetland area and associated buffer zone of 15m.  Photographic evidence can be found in Annexure C: Photo 14 and 43.	LWUA to take cognisance that the site must reduce the disturbance footprint and the unnecessary clearing of vegetation on either side of the trench as far as possible when traversing wetlands.
57			Consider above ground crossings over wetland areas. Alternatively, open trench crossings are permissible but backfilling and rehabilitation must be undertaken.	2	During the audit undertaken in February 2024 it was observed that micro-pegs have been placed along the pipeline route as to ensure all activities only take place in designated areas. Construction activities started within the buffer or boundary of the wetland in July 2023 and have since been completed.	LWUA to take cognisance that the site must consider above ground crossings over wetland areas. Alternatively, open trench crossings are permissible but backfilling and rehabilitation must be undertaken.

Audit Findings of the EMPr						
NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
<b>CONSTRUCTION PHASE</b>						
					Photographic evidence can be found in Annexure C: Photo 14 and 43.	
58			Load wetland spatial data onto a GPS and use it to mark out the positions where the pipeline will enter and exits the prescribed buffer on the boundary of a wetland. Try to reduce the disturbance footprint and the unnecessary clearing of vegetation on either side of the trench as far as possible when traversing wetlands.	0	<p>During the audit undertaken in July, August, September, October, November, December 2023, January 2024 and this audit (February 2024) it was observed that micro-pegs have been placed along the pipeline route as to ensure all activities only take place in designated areas.</p> <p>Construction activities started within the buffer or boundary of the wetland in July 2023, however the clearance of vegetation was measured as approximately 30 m. The EMPr states that clearance of vegetation must be limited to a 25m corridor along the pipeline route, and 15m (servitude) in the wetland area and associated buffer zone of 15m.</p> <p>Esor construction have a river crossing method plan that was provided to the audit team. This document is titled "Stream / River Crossing" with document number set as MET-ENV-188. This condition is addressed within this river crossing method plan.</p> <p>Photographic evidence can be found in Annexure C: Photo 14 and 43.</p>	LWUA to take cognisance that the 15 meter buffer zone of the wetlands must be demarcated on the ground.
59			All chemicals and toxicants to be used for the construction must be stored in a bunded area	1	Esor construction has a hazardous substance management plan that was provided to the audit team. This document is titled "Storage and use of Fuel Hazardous Poisonous Substance" with document number set as MET-ENV-017. Storage of hazardous material was noted as an improvement with all chemical and toxicants stored within chemical cages or drip-trays. During the audit undertaken in February 2024, drip trays were noted to be placed under some equipment on site, however some generators/pumps were noted to be operated without drip trays. Photographic evidence can be found in Annexure C: Photo 34, 40 and 41.	LWUA to take cognisance that all chemicals and toxicants to be used for the construction must be stored in a bunded area.
60			Construct the wetland crossings during winter, if possible, when flow volumes are lowest. This will reduce impacts to wetlands due to soil poaching/sourcing and vegetation trampling under peak saturation levels. Additionally, the risk of vehicles getting stuck and further degrading the vegetation integrity is lowest during this time.	2	<p>During the audit undertaken in February 2024, no construction activities are underway within the buffer or boundary of the wetland.</p> <p>Photographic evidence can be found in Annexure C: Photo 43.</p>	LWUA to take cognisance that construction of the pipeline through water resources should be constructed during winter, if possible, when flow volumes are lowest.
61	Vegetation clearing and site preparation	Increased bare surfaces, runoff and potential for erosion and resulting sedimentation of the wetlands	Keep the trench excavation neat and tidy.	2	<p>During the audit undertaken in February 2024, excavation work at the trenches were found to be semi neat and tidy. House keeping around the trenches was noted as a work in progress.</p> <p>Photographic evidence can be found in Annexure C: Photo 33, 36, 47 and 48.</p>	LWUA to take cognisance that the trench excavation must be kept neat and tidy.
62		Minimise the potential for surface water	Separate sub-soil and topsoil on either side of the trench.	1	<p>Construction activities has been completed on majority of the pipeline route.</p> <p>Portions of the pipeline route which have been recently excavated near the two rivers mine were noted to not separate topsoil and subsoil on site.</p>	LWUA to take cognisance that sub-soil and topsoil must be separated on either side of the trench.

Audit Findings of the EMPr						
NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
<b>CONSTRUCTION PHASE</b>						
		pollution			Photographic evidence can be found in Annexure C: Photo 17 and 18.	
63		Limit the disturbance and destruction of delineated wetlands	Limit construction activities across the wetlands to the dry season, if possible, when storms are least likely to wash concrete and sand into wetlands.	2	During the audit undertaken in February 2024, no construction activities are underway within the buffer or boundary of the wetland as they are completed.  Photographic evidence can be found in Annexure C: Photo 43.	LWUA to take cognisance that construction within the wetland must be limited to the dry season.
64	Ensure soil stockpiles and concrete / building sand are sufficiently safeguarded against rain wash.		2	Most soil stockpiles have been stored on flat areas where run-off will be minimal. During the December, January, February, March, April, May, June, July, August and September 2023 audits it was observed that topsoil was stockpiled within drainage lines. During this audit (February 2024), no topsoil was found within the drainage line, this was confirmed that the soil was replaced when backfilling activities were undertaken. Photographic evidence can be found in Annexure C: Photo 31 and 32.	LWUA to take cognisance that stockpile and concrete / building sand must be sufficiently safeguarded against rain wash.	
65	Mixing of concrete must under no circumstances take place in any wetland or their buffers. Scrape the area where mixing and storage of sand and concrete occurred to clean once finished.		2	During the audit undertaken in February 2024, no construction activities are underway within the buffer or boundary of the wetland as they are completed.  Photographic evidence can be found in Annexure C: Photo 43.	LWUA to take cognisance that mixing of concrete must under no circumstances take place in any wetland or their buffers	
66	Do not situate any of the construction material laydown areas within any wetland or buffer areas.		2	During the audit undertaken in February 2024, no construction activities are underway within the buffer or boundary of the wetland as they are completed.  Photographic evidence can be found in Annexure C: Photo 43.	LWUA to take cognisance that the construction material laydown areas must not be situated within any wetland or buffer areas.	
67	No machinery/equipment should be allowed to be parked in any wetlands or buffer zone areas		2	No machinery/equipment were found to be parked in wetlands or in buffer zones.	LWUA to take cognisance that no machinery/equipment should be allowed to be parked in any wetlands or buffer zone areas.	
68	Ensure topsoil is spread back over trench area on closure of the trench. It is preferred that the trench is created on a needs basis to avoid an excessive excavation. As pipe is laid, the trench must be backfilled and topsoil replaced.		1	Construction activities has been completed on majority of the pipeline route. Portions of the pipeline route which have been recently excavated near the two rivers mine were noted to not separate topsoil and subsoil on site.  Photographic evidence can be found in Annexure C: Photo 17 and 18.	LWUA to take cognisance that topsoil is to be spread back over trench area on closure of the trench. It is preferred that the trench is created on a needs basis to avoid an excessive excavation.	
69	Speed limits must be put in place to reduce erosion. • Reducing the dust generated by the listed activities above, especially the earth moving machinery, through wetting the soil surface and putting up signs to enforce speed limit as well as speed bumps built to force slow speeds; • Signs must be put up to enforce this.		2	Site personnel are made aware of the importance of adhering to traffic signs and speed limits through the environmental awareness training. The site is currently using existing roads which have their own speed limits to follow. Dust suppression will be implemented along the cleared area as to reduce the amount of dust generated by this development.	LWUA to take cognisance that speed limits must be put in place to reduce erosion.	
70	Where possible, existing access routes and walking paths must be made use of.		2	Access to the Spitskop Pump Station and the Pipeline Route is done using existing roads. Construction activities along the pipeline route is done within the pipeline servitude. No new roads were identified at the time of this audit (November	LWUA to take cognisance that existing access routes and walking paths must be made use of.	

Audit Findings of the EMPr						
NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
<b>CONSTRUCTION PHASE</b>						
					2023).Photographic evidence can be found in Annexure C: Photo 33.	
71			Areas that are denuded during construction need to be re-vegetated with indigenous vegetation to prevent erosion during flood events and strong winds.	2	At the time of this audit, it was found that natural vegetation was left to grow back over the rainy season.	LWUA to take cognisance that areas that are denuded during construction need to be re-vegetated with indigenous vegetation to prevent erosion during flood events and strong winds.
72			A stormwater management plan must be compiled and implemented.	2	Esor construction have a stormwater management plan that was provided to the audit team. This document is titled "Stormwater Management" with document number set as MET-ENV-015. This plan will be implemented on site.	LWUA to take cognisance that a stormwater management plan must be compiled and implemented.
73			Landscape and lightly till (no deeper than 30 cm) denuded areas to encourage vegetation establishment as soon as possible.	2	At the time of this audit, it was found that natural vegetation was left to grow back over the rainy season.	LWUA to take cognisance that topsoil must be lightly landscaped to promote vegetation growth.
74	Vegetation clearing and site preparation	Degradation of wetland vegetation and the introduction and spread of alien and invasive vegetation - Minimise the potential for surface water pollution  Limit the disturbance and destruction of delineated wetlands	Promptly remove all alien and invasive plant species that may emerge during construction (i.e. weedy annuals and other alien forbs) must be removed.	1	Esor construction have an alien plant clearing plan that was provided to the audit team. This document is title "Alien Plant Clearing" with document number set as MET-ENV-026.  During the audit undertaken in February 2024, Alien and Invasive species were found along the pipeline route as well as at the Spitskop Pump Station.  Photographic evidence can be found in Annexure C: Photo 44.	LWUA to take cognisance that all alien and invasive plant species that may emerge during construction must be promptly removed.
75			The use of herbicides is not recommended in or near wetlands (opt for mechanical removal).	2	Esor construction have a river crossing method plan that was provided to the audit team. This document is titled "Stream / River Crossing" with document number set as MET-ENV-188. This condition is addressed within this river crossing method plan.	LWUA to take cognisance that the use of herbicides to remove alien species is not recommended in or near wetlands
76			Appropriately stockpile topsoil cleared from the project area. This can be used for rehabilitation of the servitude.	2	All soil removed as part of construction activities at the time of the audit was observed to be stockpile on flat land and no erosion was observed. The contactors were informed that erosion protection measures must be put into place at all stockpile areas.  Photographic evidence can be found in Annexure C: Photo 17 and 18.	LWUA to take cognisance that stockpile topsoil cleared from the project area can be used for rehabilitation of the servitude.
77			Clearly demarcate construction footprint, and limit all activities to within this area.	2	During the audit undertaken in February 2024 it was observed that micro-pegs have been placed along the pipeline route as to ensure all activities only take place in designated areas. Photographic evidence can be found in Annexure C: Photo 14.	LWUA to take cognisance that the construction footprint must be clearly demarcate and limit all activities to within this area.
78			Minimize unnecessary clearing of vegetation.	0	Approval was granted for the clearance of a corridor area of 25m (inclusive of the servitude). Currently approximately a 17m corridor is cleared for construction of the pipeline.  However, at the wetland area, vegetation clearance must be limited to the servitude (15m). Currently the clearance in the wetland area is 30 m.  Photographic evidence can be found in Annexure C: Photo 43.	LWUA to take cognisance that vegetation must not be cleared unless absolutely necessary.
79			All contractors and employees should undergo induction which is to include a component of environmental awareness. The induction is to include aspects such as the	2	AvDE conducted Environmental Awareness Training with Esor Construction during the pre-construction audit on 16 September 2022. This training looked at all of the EMPr conditions and how	LWUA to take cognisance that all contractors and employees should undergo induction which

Audit Findings of the EMPr						
NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
<b>CONSTRUCTION PHASE</b>						
			need to avoid littering, the reporting and cleaning of spills and leaks and general good "housekeeping".		they must be implemented on site. The contractors were instructed that Environmental Training will need to be undertaken for all workers on the project. All new personnel employed by this project undergo Environmental Induction with the ESOR Construction/ Safety officer Alexzine Nortje. Mrs Nortje also serves as the Contractors Environmental Officer on site. Photographic evidence can be found in Annexure C: Photo 4, 5 and 6.	is to include a component of environmental awareness.
80			Adequate sanitary facilities and ablutions on the servitude must be provided for all personnel throughout the project area. Use of these facilities must be enforced (these facilities must be kept clean so that they are a desired alternative to the surrounding vegetation).	1	There are ablution facilities at the Steelpoort Industrial Park, and chemical toilets are available at the Spitskop Pump Station and Reservoir Site. No chemical toilets were observed along the pipeline route currently being constructed. LWUA is advised that chemical toilets should be moved daily with construction activities and must be located outside sensitive areas. The ablution facilities are serviced on a weekly basis by Talisman Hire. Proof of these services was provided to the audit team. Photographic evidence can be found in Annexure C: Photo 37 and 49.	LWUA to take cognisance that adequate sanitary facilities and ablutions on the servitude must be provided for all personnel throughout the project and moved along the construction route as construction commences.
81			No dumping of construction material on site may take place within the wetland or buffer area. All material must be contained in waste skips and removed to designated (and licensed) facilities.	2	Construction activities started within the buffer or boundary of the wetland in July 2023. At the time of this audit (February 2024) no dumping of material was found at the wetland area. Photographic evidence can be found in Annexure C: Photo 43.	LWUA to take cognisance that no dumping of construction material on site may take place within the wetland or buffer area.
82			All waste generated on site during construction must be adequately managed. Separation and recycling of different waste materials should be supported.	1	Waste bins were noted as part of this audit. <b>Spitskop Pump Station:</b> Waste bins were noted as well as a skip which was covered with a net to prevent waste from being blown away. The signage for the specific waste streams was not clearly marked due to wear and tear, it was indicated that new signs are put in place. <b>Pipeline Route:</b> Poor housekeeping was noted along the pipeline route. The observation was specifically around waste stockpiled along the route. It is suggested that all waste be removed from site and disposed of appropriately. During the current audit, rock material that emanated from the excavations were still remained along the pipeline route. It is the intention of the Contractor to procure a crusher and undertaken the crushing of the rock on site and the resultant material will be managed by the appointed crusher management company. No waste bin was noted along the pipeline route at active construction sites and at the Wetland area <b>Reservoir Site:</b> A waste bin was noted at the reservoir site which was marked for the specific waste stream. Poor Housekeeping was noted as a	LWUA to take cognisance that all waste generated on site during construction must be adequately managed.



Audit Findings of the EMPr						
NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
<b>CONSTRUCTION PHASE</b>						
					work in progress  <b>Waste Management:</b> Waste is being disposed of at the Steelpoort Industrial Park within waste skips. Steelpoort Industrial Park had a permit to dispose of waste at the Burgersfort Landfill site which was valid until December 2023. An updated agreement was requested by the audit team, this was not provided at the time of this audit.  Photographic evidence can be found in Annexure C: Photo 26, 27, 28, 29 and 30.	
83			Landscape and re-vegetate all denuded areas as soon as possible.	NA	This condition is not applicable, at the time of this audit (February 2024) rehabilitation activities have commenced however, landscaping have not been undertaken yet.	LWUA to take cognisance that landscaping and re-vegetating all denuded areas must be implemented as soon as possible.
84	Vegetation clearing and site preparation  Trench excavation and installation of pipeline	Increased sediment loads to downstream reaches	Implement mitigation for increased bare surfaces, runoff and potential for erosion.	2	Esor construction have an erosion control plan that was provided to the audit team. This document is titled "Soil Erosion and Sediment Control" with document number set as MET-OPS-075. This condition is addressed within this erosion management plan.	LWUA to take cognisance that mitigation measures for increased bare surfaces, runoff and potential for erosion must be implemented.
85		- Minimise the potential for surface water pollution	Re-instate topsoil and lightly till disturbance footprint.	2	At the time of this audit (February 2024) rehabilitation activities have commenced on site.	LWUA to take cognisance that topsoil must be re-instated.
86		Limit the disturbance and destruction of delineated wetlands	At all crossings install sandbags on downstream side of the footprint to trap sediment until the site has been constructed and vegetation has re-established.	2	During the December, January, February, March, April, May, June, July, August and September 2023 audits it was observed that topsoil was stockpiled within drainage lines. During this audit (February 2024), no topsoil was found within the drainage line, this was confirmed that the soil was replaced when backfilling activities were undertaken. Photographic evidence can be found in Annexure C: Photo 31 and 32.	LWUA to take cognisance that at all crossings must have installed sandbags on downstream side of the footprint to trap sediment until the site has been constructed and vegetation has re-established.
87	Vegetation clearing and site preparation  Trench excavation and installation of pipeline	Contamination of wetlands with hydrocarbons due to machinery leaks and eutrophication of wetland systems with human sewerage and other waste  - Minimise the potential for surface water pollution  Limit the disturbance and destruction of delineated wetlands	Make sure all excess consumables and building materials / rubble is removed from site and deposited at an appropriate waste facility.	1	Waste bins were noted as part of this audit. <b>Spitskop Pump Station:</b> Waste bins were noted as well as a skip which was covered with a net to prevent waste from being blown away. The signage for the specific waste streams was not clearly marked due to wear and tear, it was indicated that new signs are put in place.  <b>Pipeline Route:</b> Poor housekeeping was noted along the pipeline route. The observation was specifically around waste stockpiled along the route. It is suggested that all waste be removed from site and disposed of appropriately. During the current audit, rock material that emanated from the excavations were still remained along the pipeline route. It is the intention of the Contractor to procure a crusher and undertaken the crushing of the rock on site and the resultant material will be managed by the appointed crusher management company. No waste bin was noted along the pipeline route at active construction sites and at the Wetland area.	LWUA to take cognisance that all excess consumables and building materials / rubble is removed from site and deposited at an appropriate waste facility.

Audit Findings of the EMPr						
NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
<b>CONSTRUCTION PHASE</b>						
					<p><b>Reservoir Site:</b> A waste bin was noted at the reservoir site which was marked for the specific waste stream. Poor Housekeeping was noted as a work in progress</p> <p><b>Waste Management:</b> Waste is being disposed of at the Steelpoort Industrial Park within waste skips. Steelpoort Industrial Park had a permit to dispose of waste at the Burgersfort Landfill site which was valid until December 2023. An updated agreement was requested by the audit team, this was not provided at the time of this audit.</p> <p>Photographic evidence can be found in Annexure C: Photo 26, 27, 28, 29 and 30.</p>	
88			Appropriately contain any generator diesel storage tanks, machinery spills (e.g. accidental spills of hydrocarbons oils, diesel etc.) or construction materials on site (e.g. concrete) in such a way as to prevent them leaking and entering the wetland areas.	1	Esor construction have a spill management plan that was provided to the audit team. This document is title "Storage and use of Fuel Hazardous Poisonous Substance" with document number set as MET-ENV-017. During this audit undertaken in February 2024, a spill kit could be found at the current construction site at Spitskop Pump Station, and at the Reservoir Site. A spill of an unknown substance was observed at the Reservoir during the February Audit. It was indicated that this needs to be managed as per the spill management plan in place. Drip trays were noted to be placed under some equipment on site however some generators/pumps were noted to be operated without drip trays. The chemical storage cage at the Spitskop Pumpstation was found to be locked and an MSDS sheet is kept on site to keep a record of all chemicals stored and used. Safety signages are clearly visible on the cage. Photographic evidence can be found in Annexure C: Photo 34, 35, 39 and 40.	LWUA to take cognisance that all diesel or hazardous storage must be within a bunded area.
89			Mixing of concrete must under no circumstances take place within the wetland or buffer areas.	2	During the audit undertaken in February 2024, no construction activities are underway within the buffer or boundary of the wetland as they are completed.  Photographic evidence can be found in Annexure C: Photo 43.	LWUA to take cognisance that mixing of concrete must under no circumstances take place within the wetland or buffer areas.
90			Regularly maintain stormwater infrastructure, pipes, pumps and machinery to minimise the potential for leaks. Check for oil leaks, keep a tidy operation, install bins and promptly clean up any spills or litter.	2	Esor construction has a number of method statements that was provided to the audit team. These plans address stormwater management, storage and use of hazardous material as well as waste management on site. These plans address the terms of this condition.	LWUA to take cognisance that regularly maintenance of stormwater infrastructure, pipes, pumps and machinery must be implemented to minimise the potential for leaks
91			Provide appropriate sanitation facilities during construction and service them regularly. These must be beyond the wetland and buffer area.	1	There are ablution facilities at the Steelpoort Industrial Park, and chemical toilets are available at the Spitskop Pump Station and Reservoir Site.  No chemical toilets were observed along the pipeline route currently being constructed. LWUA is advised that chemical toilets should be moved daily with construction activities and must be located outside sensitive areas.  The ablution facilities are serviced on a weekly basis by Talisman Hire. Proof of these services was provided to the audit team.	LWUA to take cognisance that appropriate sanitation facilities must be provided during construction and serviced regularly

Audit Findings of the EMPr						
NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
<b>CONSTRUCTION PHASE</b>						
					Photographic evidence can be found in Annexure C: Photo 37 and 49.	
92			Monitor and inspect machinery, vehicles and equipment for leaks and spills.	2	Esor construction have a spill management plan that was provided to the audit team. This document is title "Storage and use of Fuel Hazardous Poisonous Substance" with document number set as MET-ENV-017. This condition is addressed within this management plan.	LWUA to take cognisance that machinery, vehicles and equipment must be maintained and inspected for leaks and spills.
93	Backfilling of trench	Disruption of wetland soil profile and alteration of hydrological regime - Minimise the potential for surface water pollution  Limit the disturbance and destruction of delineated wetlands	Document the soil profile on removal and check the order in which soil is replaced. Separate the topsoil (including seedbank) from the subsoil layer.	1	Construction activities has been completed on majority of the pipeline route. Portions of the pipeline route which have been recently excavated near the two rivers mine were noted to not separate topsoil and subsoil on site.  Photographic evidence can be found in Annexure C: Photo 17 and 18.	LWUA to take cognisance that topsoil (including seedbank) must be separated from the subsoil layer.
94			Ensure that topsoil is appropriately stored and re-applied during trench backfilling.	1	Construction activities has been completed on majority of the pipeline route. Portions of the pipeline route which have been recently excavated near the two rivers mine were noted to not separate topsoil and subsoil on site.  Photographic evidence can be found in Annexure C: Photo 17 and 18.	LWUA to take cognisance that topsoil needs to be appropriately stored and re-applied during trench backfilling.
95			Ensure that the soil is backfilled and compacted to accepted geotechnical standards to avoid flow canalisation along the trench and the potential for sinkhole formation.	2	At the time of this audit (February 2024) backfilling activities have commenced on site at large portions of the pipeline route. No canalisation was observed.  Photographic evidence can be found in Annexure C: Photo 18.	LWUA to take cognisance that the contractor must ensure that the soil is backfilled and compacted to accepted geotechnical standards to avoid flow canalisation along the trench and the potential for sinkhole formation.
<b>HERITAGE</b>						
96	Site clearing and preparation  Trench excavation and installation of infrastructure	Impact on graves and cemeteries found along SE2 pipeline route - Protect and preserve heritage resources	All recorded graves and burial sites should be indicated on development plans and avoided with a buffer of 30m.	2	The three identified grave sites (LWUA 1; 2 and 3) are on the development plans. Construction is currently taking place along LWUA 1, 2 and 3. These areas are not impacted upon by the construction activities. Photographic evidence can be found in Annexure C: Photo 19, 20 and 21.	LWUA to take cognisance that all recorded graves and burial sites should be indicated on development plans and avoided with a buffer of 30m.
97			The graves and cemeteries must be accessible at all times during construction.	2	It was confirmed during this audit undertaken in February 2024 that the graves and graveyard are still accessible to families. Photographic evidence can be found in Annexure C: Photo 19, 20 and 21.	LWUA to take cognisance that graves and cemeteries must be accessible at all times during construction.
98			Burial sites (LWUA 1,2,3) must be cleared of vegetation to establish the boundaries of the sites to determine the possibility of unmarked graves.	2	Burial site LWUA 1, Graveyard LWUA 2 and Burial site LWUA 3 has been cleared of vegetation and construction activities are taking place outside the boundary of these sites. LWUA 1 was found to have a headstone that was knocked over. It was confirmed within the Heritage Impact Assessment Report dated August 2021, that this was the condition the site was found in and not a result of construction activities. Photographic evidence can be found in Annexure C: Photo 19, 20 and 21.	LWUA to take cognisance that burial sites (LWUA 1,2,3) must be cleared of vegetation to establish the boundaries of the sites to determine the possibility of unmarked graves.

Audit Findings of the EMPr						
NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
<b>CONSTRUCTION PHASE</b>						
99			Implement dust suppression around graves and cemeteries to minimise dust fallout on headstones.	2	The contractors have got an agreement with a local supplier to utilise a water bowser tank for dust suppression along the cleared areas, these areas are around the graveyard and burial site.  Photographic evidence can be found in Annexure C: Photo 50.	LWUA to take cognisance that dust suppression should be implemented around graves and cemeteries to minimise dust fallout on headstones.
100			Implement the chance find procedure should an artefact or grave be uncovered during construction.	2	A chance find procedure has been implemented on site.  In June 2023, a complaint was received from the Mokabane Royal Council that graves were disturbed at LWUA 1 due to construction activities. Subsequently, an archaeologist was appointed to assess this claim and a report was prepared. SAHRA (Natasha Higgitt) was informed of this finding on 4 August 2023 with the archaeologist report attached. A newly identified grave was found and ladled SP 12, this grave was 22 meters from the pipeline excavations and no impacts were noted in the report. The grave is demarcated as per the instruction from SAHRA. Photographic evidence can be found in Annexure C: Photo 22 and 23.  On 7 August 2023, bones were discovered in the excavation trench at the Steelpoort Industrial Park. At the time of this audit (14 November 2023) an archaeologist has assessed the bones and confirmed they are human remains. SAHRA (Natasha Higgitt) was informed of this finding on 8 August 2023 and the actions implemented on site was confirmed to be sufficient, these include stopping construction in the vicinity and barricade the area.  SAHRA has given formal response to the findings on 11 September 2023. The conditions are included in Table 4-4. Subsequently on 9 February 2024 SAHRA released a Final Decision note, indicating that SAHRA is satisfied with the permit report and outcome and that this aspect is now closed by SAHRA. During the February 2023 environmental audit, this area was noted to be completely backfilled and no further construction activities are taking place in this area. Photographic evidence can be found in Annexure C: Photo 24 and 25.	LWUA to take cognisance that should an artefact or grave be uncovered during construction implementation the chance find procedure will be required.
101	Site clearing and preparation Trench excavation and installation of infrastructure	Impact of the ephemeral walling at LWUA 04 - Protect and preserve heritage resources	Implement the chance find procedure should an artefact or grave be uncovered during construction.	2	A chance find procedure has been implemented on site. In June 2023, a complaint was received from the Mokabane Royal Council that graves were disturbed at LWUA 1 due to construction activities. Subsequently, an archaeologist was appointed to assess this claim and a report was prepared. SAHRA (Natasha Higgitt) was informed of this finding on 4 August 2023 with the archaeologist report attached. A newly identified grave was found and ladled SP 12, this grave was 22 meters from the pipeline excavations and no impacts were noted in the report. The grave is demarcated as per the instruction from SAHRA. Photographic evidence can be found in Annexure C: Photo 22 and 23. On 7 August 2023, bones were discovered in the excavation trench at the Steelpoort Industrial Park. At the time of this audit (14	LWUA to take cognisance that a the chance find procedure should be implemented if an artefact or grave be uncovered during construction.

Audit Findings of the EMPr						
NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
<b>CONSTRUCTION PHASE</b>						
					November 2023) an archaeologist has assessed the bones and confirmed they are human remains. SAHRA (Natasha Higgitt) was informed of this finding on 8 August 2023 and the actions implemented on site was confirmed to be sufficient, these include stopping construction in the vicinity and barricade the area. SAHRA has given formal response to the findings on 11 September 2023. The conditions are included in Table 4-4. Subsequently on 9 February 2024 SAHRA released a Final Decision note, indicating that SAHRA is satisfied with the permit report and outcome and that this aspect is now closed by SAHRA. During the February 2023 environmental audit, this area was noted to be completely backfilled and no further construction activities are taking place in this area. Photographic evidence can be found in Annexure C: Photo 24 and 25.	
102			If it not possible to avoid site LWUA 4, a permit in terms of section 35(4) of the NHRA must be applied from SAHRA prior to the construction phase.	NA	The final section of the pipeline from Dwarsrivier to Mototolo will not be constructed as of yet, the pipeline will stop at Dwarsrivier Pump Station. The LWUA 4 site area will therefore be avoided completely by the construction activities.	None
103			Submit monitoring reports to SAHRA once the construction phase has been completed	NA	This condition is not applicable at this stage as construction has not yet been completed (February 2024).	LWUA to take cognisance that monitoring reports must be submitted to SAHRA once the construction phase has been completed
<b>NOISE</b>						
104	Site clearing and preparation	General rise in ambient noise levels	Ensure high level of equipment maintenance, especially intake and exhaust mufflers.	2	All machinery is inspected on a regular basis and if any maintenance is required this is done at the Steelpoort Industrial Park.	LWUA to take cognisance that high levels of equipment maintenance, especially intake and exhaust mufflers must be ensured.
105	Trench excavation and installation of pipeline	- Minimise the generation of noise	Replace pure tone (beeping) with broadband (hissing) reversing alarms.	NA	This condition is not applicable as all equipment is maintained sufficiently.	LWUA to take cognisance that the site must replace pure tone (beeping) with broadband (hissing) reversing alarms.
106	Construction of reservoir		Construction activities to take place only during daylight hours.	2	No construction activities are currently taking place during night time working hours are from 07:00 - 16:30 Monday to Friday.	LWUA to take cognisance that construction activities are to take place only during daylight hours.
<b>AIR QUALITY</b>						
107	Site clearing and preparation	Increased dust fallout around construction areas	Apply dust suppressants to gravel roads used.	2	The contractors have got an agreement with a local supplier to utilise a water bowser for dust suppression along the cleared areas, these areas are around the graveyard and burial site.  Photographic evidence can be found in Annexure C: Photo 50.	LWUA to take cognisance that dust suppression must be undertaken on any gravel roads used
108	Trench excavation and installation of pipeline	- Minimise atmospheric emissions and dust generation	Set speed limits to 40 km/h to minimise the creation of fugitive dust within the project boundary.	2	At the time of this audit (February 2024) no new roads are being utilized, existing roads were found to have their own speed limits. Dust suppression will be implemented along the cleared area as to reduce the amount of dust generated by this development.	LWUA to take cognisance that the site must set speed limits to 40 km/h to minimise the creation of fugitive dust.
109	Construction of reservoir		Dust-reducing mitigation measures must be put in place and must be strictly adhered to, during the construction phase. This includes wetting of exposed soft soil surfaces and not conducting activities on windy days which will increase the likelihood of dust being generated.	2	The contractors have got an agreement with a local supplier to utilise a water bowser tank for dust suppression along the cleared areas, these areas are around the graveyard and burial site.  Photographic evidence can be found in Annexure C: Photo 50.	LWUA to take cognisance that dust-reducing mitigation measures must be put in place and must be strictly adhered to
<b>SOCIAL</b>						

Audit Findings of the EMPr						
NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
<b>CONSTRUCTION PHASE</b>						
110	Construction of SE2 pipeline and reservoir	Benefits resulting from employment and income opportunities created by the construction of the pipelines - Maximise employment opportunities and social benefits	Develop a clear and concise employment policy prioritising local employment	2	During the environmental audit site visit undertaken in February 2023 it was confirmed that 40 local people are employed for this project via ESOR.	LWUA to take cognisance that the site must develop a clear and concise employment policy prioritising local employment
111			Employ local works if qualified applicants with the appropriate skills are available.	2	During the environmental audit site visit undertaken in February 2024 it was confirmed that the project's Community Liaison Officers (CLO) Mr Elvis Kgwete is a local who has been employed for this project. The other appointed CLO Mr Jack Dikotope resigned in June 2023.	LWUA to take cognisance that the site must employ local works if qualified applicants with the appropriate skills are available.
112			Purchase goods and services at a local level if available.	2	During the seventeenth construction site visit undertaken in February 2024 it was confirmed that one (1) 10 m <sup>3</sup> tippers, two (2) TLB's, two 20T excavators, one water bowser and a 20 ton Peaker are sourced locally. Any additional material needed if found within the area will be bought locally.	LWUA to take cognisance that the site must purchase goods and services at a local level if available.
113	Construction of SE2 pipeline and reservoir	Influx of people and construction workers leading to increased pressure on social services and infrastructure, social pathologies and disruptions, resulting in spontaneous settlements - Maximise employment opportunities and social benefits	Develop a clear and concise employment and recruitment policy that prioritizes local recruitment. Ensure that contractors adhere to this policy.	2	During the environmental audit site visit undertaken in February 2023 it was confirmed that 40 local people are employed for this project via ESOR.	LWUA to take cognisance that the site must develop a clear and concise employment and recruitment policy that prioritizes local recruitment.
114			Identify and support community development programmes that address challenges raised by population influx and spontaneous settlement.	2	Esor construction has an employment policy to hire as many local people as needed for the project. This will reduce the amount of people flooding the area due to the construction of this pipeline and assist in population influx.	LWUA to take cognisance that the site must identify and support community development programmes.
115			Support local government capacity for integrated development planning.	2	LWUA has a number of community development projects that are implemented within rural areas. This includes Water projects to help get raw water to informal communities, Educational projects to help with skills development and easier learning, Recreational projects such as sports sponsorships and help with construction of sports facilities. LWUA has also initiated a small-scale farming project to help the Limpopo Department of Agriculture and Rural Development (LDARD) with food security projects within the Limpopo area.	LWUA to take cognisance that the site must support local government capacity for integrated development planning.
116			Prepare a detailed vocational training program in consultation with the local community to be implemented during the construction phase.	2	During the environmental audit site visit undertaken in February 2024 it was confirmed that the project's Community Liaison Officers (CLO) Mr Elvis Kgwete is a local who has been employed for this project. The CLO is responsible for communications with the communities on the project as well as assisting in the local employment of people for this project. The other appointed CLO Mr Jack Dikotope resigned in June 2023.	LWUA to take cognisance that the site must prepare a detailed vocational training program in consultation with the local community to be implemented during the construction phase.
117			Through the stakeholder engagement process ensure that expectations are managed around employment opportunities and practices.	2	During the environmental audit site visit undertaken in February 2024 it was confirmed that the project's Community Liaison Officers (CLO) Mr Elvis Kgwete is a local who has been employed for this project. The CLO is responsible for communications with the communities on the project as well as assisting in the local employment of people for this project. The other appointed CLO Mr Jack Dikotope resigned in June 2023.	LWUA to take cognisance that the site must through the stakeholder engagement process ensure that expectations are managed around employment opportunities and practices.
118	Construction of SE2 pipeline and reservoir	Dissatisfaction over employment opportunities and conditions of	Develop a clear and concise employment and recruitment policy that prioritizes local recruitment. Ensure that contractors adhere to this policy.	2	During the environmental audit site visit undertaken in February 2023 it was confirmed that 40 local people are employed for this project via ESOR.	LWUA to take cognisance that the site must develop a clear and concise employment and recruitment policy that prioritizes local recruitment.

Audit Findings of the EMPr						
NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
<b>CONSTRUCTION PHASE</b>						
119		procurement which could potentially lead to community protests and unrests, as well as conflicts within communities - Maximise employment opportunities and social benefits	Through the stakeholder engagement process ensure that expectations are managed around employment opportunities and practices.	2	During the environmental audit site visit undertaken in February 2024 it was confirmed that the project's Community Liaison Officers (CLO) Mr Elvis Kgwete is a local who has been employed for this project. The CLO is responsible for communications with the communities on the project as well as assisting in the local employment of people for this project. The other appointed CLO Mr Jack Dikotope resigned in June 2023.	LWUA to take cognisance that the site must through the stakeholder engagement process ensure that expectations are managed around employment opportunities and practices.
120			Monitor and implement the Grievance Management Mechanism.	2	LWUA understands that site must monitor and implement the Grievance Management Mechanism once construction of the pipeline commences.	LWUA to take cognisance that the site must monitor and implement the Grievance Management Mechanism.
121			Involve Local Ward Councillors and keep them informed about project developments, and included in all stakeholder engagement processes. Their involvement will assist with the successful development of relationships between the LWUA, the municipality and the communities.	2	The local ward councillor for Ward 27, C Makua, was informed of the project through the stakeholder engagement process. This includes the notification of approval of the EA from the DFFE. The ward councillor will continue being informed on the project as part of the stakeholder engagement process.	LWUA to take cognisance that the site must involve Local Ward Councillors and keep them informed about project developments.
<b>Total Compliance Score</b>				<b>200</b>		
<b>Total Compliance Percentage</b>				<b>85%</b>		

Table 4:3 Audit findings of SAHRA's conditions

Audit Findings of the SAHRA's Conditions				
NR	LICENCE CONDITION	COMPLIANCE STATUS	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
<b>FINAL COMMENTS</b>				
1	The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit and the Burial Grounds and Graves (BGG) Unit have no objection to the proposed development;	2	It is noted that no objections to the proposed development were raised by SAHRA.	None
2	The recommendations of the specialists are supported and must be adhered to. Further additional specific conditions are provided for the development as follows:	2	LWUA understands that all recommendations made by the specialists need to be adhered to.	None
2.1	APM Unit conditions: If it not possible to avoid site LWUA 4, a permit in terms of section 35(4) of the NHRA must be applied from SAHRA prior to the construction phase;	NA	Phase 2 of the project (pipeline from Dwarsrivier Pump Station to Mototolo) has not yet commenced. As the LWUA 4 site is situated on the pipeline route from Dwarsrivier Pump Station to Mototolo, this condition is not applicable for this audit.	None
2.2	Monitoring reports must be submitted to SAHRA once the construction phase has been completed	NA	This condition is not applicable as the project is currently in the construction phase and no component has been completed.	LWUA to take cognisance that once construction has been completed all monitoring reports needed to be submitted to SAHRA
2.3	BGG Unit conditions: Identified Burial sites (LWUA 1, 2, 3) must be cleared of vegetation to establish the boundaries of the sites as the possibility of unmarked graves exists;	2	Burial site LWUA 1, Graveyard LWUA 2 and Burial site LWUA 3 has been cleared of vegetation and construction activities are taking place outside the boundary of these sites. LWUA 1 was found to have a headstone that was knocked over. It was confirmed within the Heritage Impact Assessment Report dated August 2021, that this was the condition the site was found in and not a result of construction activities.  Photographic evidence can be found in Annexure C: Photo 19, 20 and 21.	None
3	If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;	2	In June 2023, a complaint was received from the Mokabane Royal Council that graves were disturbed at LWUA 1 due to construction activities. Subsequently, an archaeologist was appointed to assess this claim and a report was prepared. SAHRA (Natasha Higgitt) was informed of this finding on 4 August 2023 with the archaeologist report attached. A newly identified grave was found and ladled SP 12, this grave was 22 meters from the pipeline excavations and no impacts were noted in the report. The grave is demarcated as per the instruction from SAHRA. Photographic evidence can be found in Annexure C: Photo 22 and 23.  On 7 August 2023, bones were discovered in the excavation trench at the Steelpoort Industrial Park. At the time of this audit (14 November 2023) an archaeologist has assessed the bones and confirmed they are human remains. SAHRA (Natasha Higgitt) was informed of this finding on 8 August 2023 and the actions implemented on site was confirmed to be sufficient, these include stopping construction in the vicinity and barricade the area.  SAHRA has given formal response to the findings on 11 September 2023. The conditions are included in Table 4-4. Subsequently on 9 February 2024 SAHRA released a Final Decision note, indicating that SAHRA is satisfied with the permit report and outcome and that this aspect is now closed by SAHRA. During the February 2023 environmental audit, this area was noted to be completely backfilled and no further construction activities are taking place in this area.  Photographic evidence can be found in Annexure C: Photo 24 and 25.	LWUA to take cognisance that should any archaeological sites be discovered during excavation activities, all works to be stopped and the SAHRA must be alerted immediately.
4	If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thigahangwii Tshivhase/ Ngqalabutho Madida 012 320 8490), must be altered immediately as per section 36(6) of the NHRA and item 5 of the Schedule;	2	In June 2023, a complaint was received from the Mokabane Royal Council that graves were disturbed at LWUA 1 due to construction activities. Subsequently, an archaeologist was appointed to assess this claim and a report was prepared. SAHRA (Natasha Higgitt) was informed of this finding on 4 August 2023 with the archaeologist report attached. A newly	LWUA to take cognisance that the new grave must be clearly marked and be avoided during construction activities.



Audit Findings of the SAHRA's Conditions				
NR	LICENCE CONDITION	COMPLIANCE STATUS	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
			<p>identified grave was found and ladled SP 12, this grave was 22 meters from the pipeline excavations and no impacts were noted in the report. The grave is demarcated as per the instruction from SAHRA. Photographic evidence can be found in Annexure C: Photo 22 and 23.</p> <p>On 7 August 2023, bones were discovered in the excavation trench at the Steelpoort Industrial Park. At the time of this audit (14 November 2023) an archaeologist has assessed the bones and confirmed they are human remains. SAHRA (Natasha Higgitt) was informed of this finding on 8 August 2023 and the actions implemented on site was confirmed to be sufficient, these include stopping construction in the vicinity and barricade the area.</p> <p>SAHRA has given formal response to the findings on 11 September 2023. The conditions are included in Table 4-4. Subsequently on 9 February 2024 SAHRA released a Final Decision note, indicating that SAHRA is satisfied with the permit report and outcome and that this aspect is now closed by SAHRA. During the February 2023 environmental audit, this area was noted to be completely backfilled and no further construction activities are taking place in this area.</p> <p>Photographic evidence can be found in Annexure C: Photo 24 and 25.</p>	
5	See section 51 of the NHRA regarding offences;	2	LWUA understands that if conditions are not adhered to SARHA can issue LWUA with an offence as per Section 51 of the NHRA.	None
6	The following conditions apply with regards to the appointment of specialists:			
6.1	With reference to the mitigation work noted above, a qualified archaeologist must be appointed to undertake the work in terms of the permit applied for as noted above;	2	A heritage consultant has been appointed to apply for the required permits to rebury the bones found within the trench excavation. On 9 February 2024 SAHRA released a Final Decision note, indicating that SAHRA is satisfied with the permit report and outcome and that this aspect is now closed by SAHRA.	It is recommended that a heritage consultant is appointed to undertake the required studies and reburial of the human remains.
6.2	If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be or archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;	2	<p>In June 2023, a complaint was received from the Mokabane Royal Council that graves were disturbed at LWUA 1 due to construction activities. Subsequently, an archaeologist was appointed to assess this claim and a report was prepared. SAHRA (Natasha Higgitt) was informed of this finding on 4 August 2023 with the archaeologist report attached. A newly identified grave was found and ladled SP 12, this grave was 22 meters from the pipeline excavations and no impacts were noted in the report. The grave is demarcated as per the instruction from SAHRA. Photographic evidence can be found in Annexure C: Photo 22 and 23.</p> <p>On 7 August 2023, bones were discovered in the excavation trench at the Steelpoort Industrial Park. At the time of this audit (14 November 2023) an archaeologist has assessed the bones and confirmed they are human remains. SAHRA (Natasha Higgitt) was informed of this finding on 8 August 2023 and the actions implemented on site was confirmed to be sufficient, these include stopping construction in the vicinity and barricade the area.</p> <p>SAHRA has given formal response to the findings on 11 September 2023. The conditions are included in Table 4-4. Subsequently on 9 February 2024 SAHRA released a Final Decision note, indicating that SAHRA is satisfied with the permit report and outcome and that this aspect is now closed by SAHRA. During the February 2023 environmental audit, this</p>	It is recommended that a heritage consultant is appointed to undertake the required studies and reburial of the human remains.

Audit Findings of the SAHRA's Conditions				
NR	LICENCE CONDITION	COMPLIANCE STATUS	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
			area was noted to be completely backfilled and no further construction activities are taking place in this area.	
			Photographic evidence can be found in Annexure C: Photo 24 and 25.	
6.3	The Final BAR and EMPr must be submitted to SAHRA for records purposes;	2	The final BAR and EMPr was uploaded onto SAHRIS by AVDE on 28 September 2022.	None
6.4	The decision regarding the EA Application must be communicated to SAHRA and uploaded to the SAHRIS Case application.	2	The final decision was provided to SARHA during the notification of I&APs. This email was sent to SARHA on 13 September 2022 and uploaded onto SAHRIS.	None
<b>Total Compliance Score</b>		<b>20</b>		
<b>Total Compliance Percentage</b>		<b>100%</b>		

Table 4:4 Audit findings of additional SAHRA conditions (received 11 September 2023)

Audit Findings of the additional SAHRA Conditions (dated 11 September 2023)				
NR	LICENCE CONDITION	COMPLIANCE STATUS	OBSERVATION IN FEBRUARY 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
<b>Identified grave along SE2 pipeline route</b>				
1.1	All identified graves must be fenced or demarcated and to include at least a 10 m buffer to avoid physical impact;	2	All graves have been fenced and/or demarcated. Refer to Photo 22.	The grave must be clearly marked and fenced to ensure that construction activities are not affecting the identified grave. Family members must still be able to visit the grave.
1.2	Continued monitoring by the ECO should be implemented	2	The grave is included as part of the environmental performance assessment undertaken by the ECO on a monthly basis.	None
1.3	If impact is unavoidable, a process of social consulting in accordance with section 36 of the NRHA should be followed.	2	The grave is not impacted on by the construction activities	None
<b>Human remains unearthed during the construction phase.</b>				
2.1	The area is left undisturbed and an alternative route for the pipeline is excavated.	2	This is not a viable option	
2.2	If this is not a viable option, the remains should be exhumed, analysed and then reburied or sent to a formal repository for human remains	2	<p>During the February 2024 environmental audit, the bones found have been removed and was reburied at the Origstad Municipal Cemetery on 5 January 2024.</p> <p>On 9 February 2024 SAHRA released a Final Decision note, indicating that SAHRA is satisfied with the permit report and outcome and that this aspect is now closed by SAHRA.</p> <p>During the February 2023 environmental audit, this area was noted to be completely backfilled and no further construction activities are taking place in this area.</p> <p>Photographic evidence can be found in Annexure C: Photo 24 and 25</p>	It is recommended that a heritage consultant is appointed to undertake the required studies and reburial of the human remains.
2.3	Regarding the identified human remains within the trench, SAHRA requests a full report of the find be submitted by an archaeologist i.e. location of the find with a map, surface indicators, possible construction alternatives, including the proposed mitigation measures.	2	A heritage consultant has been appointed.	It is recommended that a heritage consultant is appointed to undertake the required studies and reburial of the human remains.
<b>Total Compliance Score</b>		<b>12</b>		
<b>Total Compliance Percentage</b>		<b>100%</b>		

## 5 CONCLUSION AND RECOMMENDATIONS

An overall compliance rating of 95% has been achieved for the February 2024 audit, which also serves as the seventeenth construction compliance audit for the project. Conditions and commitments from four documents were considered, namely the environmental authorisation, approved EMPr, final comments and additional comments from SAHRA. Refer to Table 5:1.

**Table 5:1: Percentage compliance**

<b>Document</b>	<b>% Compliance</b>
Environmental authorisation	96%
EMPr	85%
SAHRA	100%
SAHRA additional conditions	100%
<b>Total % Compliance</b>	<b>95%</b>

The Construction programme allows for the project to be undertaken in phases, hence not all authorised listed activities have commenced during the current audit. Several conditions and/or commitments were considered not applicable.

Table 5:2 is a register of non-compliance to conditions and commitments and includes required actions to close out the non-compliance. Table 5:3 indicates the non-compliance that has been closed out.

It is the opinion of the auditors that the EMPr sufficiently provide for the management and mitigation of potential environmental impacts associated with the undertaking of the authorised listed activities.

Table 5:2: Register of non-compliance to conditions and commitments

Date of finding	Document & Condition Number	Condition / Commitment	Finding	Required Action	Closeout Date
20 February 2024	Environmental Authorisation Condition 36	Where the pipeline is planned to be buried all topsoil must be separated from subsoil and stored separately, when backfilled the soil should be replaced in the correct order.	<p>The excavation of the pipeline route has commenced and soil excavated are stored adjacent to the excavation. A portion of the pipeline has been backfilled and soil was noted to be placed correctly.</p> <p>Portions of the pipeline route which have been recently excavated near the two rivers mine was noted to not separate topsoil and subsoil on site.</p>	<p>Topsoil and subsoil must be stored within separate stockpiles and replaced in the correct order.</p>	ASAP
20 February 2024	Environmental Management Programme Condition 1	Stockpile the topsoil and sub-soil separately on either side of the trench and backfill in the correct order.			ASAP
20 February 2024	Environmental Management Programme Condition 2	The first 300 mm of soil must be stockpiled separate from the soil excavated deeper than 300 mm			ASAP
20 February 2024	Environmental Management Programme Condition 3	The proposed pipeline system must be divided up into 100 m intervals. Each interval's soil must be stockpiled and filled back up (in the correct order) to avoid long periods of stockpiling.			ASAP
20 February 2024	Environmental Management Programme Condition 62	Separate sub-soil and topsoil on either side of the trench.			ASAP
20 February 2024	Environmental Management Programme Condition 68	Ensure topsoil is spread back over trench area on closure of the trench. It is preferred that the trench is created on a needs basis to avoid an excessive excavation. As pipe is laid, the trench must be backfilled and topsoil replaced.			ASAP
16 January 2024 20 February 2024	Environmental Management Programme Condition 93	Document the soil profile on removal and check the order in which soil is replaced. Separate the topsoil (including seedbank) from the subsoil layer.			ASAP

Date of finding	Document & Condition Number	Condition / Commitment	Finding	Required Action	Closeout Date
20 February 2024	Environmental Management Programme Condition 94	Ensure that topsoil is appropriately stored and re-applied during trench backfilling.			ASAP
6 December 2023 16 January 2024 20 February 2024	Environmental Authorisation Condition 46	An integrated waste management approach must be implemented that is based on waste minimisation and must incorporate reduction, recycling, re-use and disposal where appropriate. Any solid waste must be disposed of at a landfill licensed in terms of Section 20 (b) of the National Environmental Management Waste Act, 2008 (Act No. 59 of 2008).	Waste bins were noted as part of this audit. <b>Spitskop Pump Station:</b> Waste bins were noted as well as a skip which was covered with a net to prevent waste from being blown away. The signage for the specific waste streams was not clearly marked due to wear and tear, it was indicated that new signs are put in place.	It is recommended that the contractor undertakes toolbox talks on waste management and general house keeping as to ensure all personnel are aware of the procedures in place for waste management on site.  It is further recommended that waste bins are provided at all active construction sites which are correctly labelled .	ASAP
14 March 2023 18 April 2023 16 May 2023 20 June 2023 18 July 2023 15 August 2023 19 September 2023 17 October 2023 14 November 2023 6 December 2023 16 January 2024 20 February 2024	Environmental Management Programme Condition 35	Waste management must be a priority and all waste must be collected and stored adequately. It is recommended that all waste be removed from site on a weekly basis to prevent rodents and pests entering the site	<b>Pipeline Route:</b> Poor housekeeping was noted along the pipeline route. The observation was specifically around waste stockpiled along the route. It is suggested that all waste be removed from site and disposed of appropriately. No waste bin was noted along the pipeline route at active construction sites and at the Wetland area  <b>Reservoir Site:</b> A waste bin was noted at the reservoir site which was marked for the specific waste stream. Poor Housekeeping was noted as a work in progress	The Landfill agreement needs to be updated and provided to the audit team	ASAP
14 March 2023 18 April 2023 16 May 2023 20 June 2023 18 July 2023	Environmental Management Programme Condition 45	Ensure the correct handling, storage and operation of general waste generated on the construction site.	<b>Waste Management:</b> Waste is being disposed of at the Steelpoort Industrial Park within waste		ASAP

Date of finding	Document & Condition Number	Condition / Commitment	Finding	Required Action	Closeout Date
15 August 2023 19 September 2023 17 October 2023 14 November 2023 6 December 2023 16 January 2024 <b>20 February 2024</b>			skips. Steelpoort Industrial Park had a permit to dispose of waste at the Burgersfort Landfill site which was valid until December 2023. An updated agreement was requested by the audit team, this was not provided at the time of this audit.		
20 June 2023 18 July 2023 15 August 2023 19 September 2023 17 October 2023 14 November 2023 6 December 2023 16 January 2024 <b>20 February 2024</b>	Environmental Management Programme Condition 47	The Contractor should supply sealable and properly marked domestic waste collection bins and all solid waste collected shall be disposed of at a licensed disposal facility. Waste management must be a priority and all waste must be collected and stored effectively.			ASAP
20 June 2023 18 July 2023 15 August 2023 19 September 2023 17 October 2023 14 November 2023 6 December 2023 16 January 2024 <b>20 February 2024</b>	Environmental Management Programme Condition 49	Refuse bins will be emptied and secured. Temporary storage of domestic waste shall be in covered waste skips. Maximum domestic waste storage period will be 10 days.			ASAP
<b>20 February 2024</b>	Environmental Management Programme Condition 50	Remove general waste generated frequently as to prevent the development of a breeding habitat for			ASAP

Date of finding	Document & Condition Number	Condition / Commitment	Finding	Required Action	Closeout Date
		nuisance pests such as flies and attracting rodents and baboons.			
16 January 2024 <b>20 February 2024</b>	Environmental Management Programme Condition 82	All waste generated on site during construction must be adequately managed. Separation and recycling of different waste materials should be supported.			ASAP
17 October 2023 14 November 2023 6 December 2023 16 January 2024 <b>20 February 2024</b>	Environmental Management Programme Condition 50	Remove general waste generated frequently as to prevent the development of a breeding habitat for nuisance pests such as flies and attracting rodents and baboons.			ASAP
17 October 2023 14 November 2023 6 December 2023 16 January 2024 <b>20 February 2024</b>	Environmental Management Programme Condition 87	Make sure all excess consumables and building materials / rubble is removed from site and deposited at an appropriate waste facility.			ASAP
<b>20 February 2024</b>	Environmental Management Programme Condition 16	A hydrocarbon spill management plan must be put in place to ensure that should there be any chemical spill out or over that it does not run into the surrounding areas.	During this audit undertaken in February 2024, a spill kit could be found at the current construction site at Spitskop Pump Station, and at the Reservoir Site.	All spills to be treated with the spill kit and contaminated soil disposed of at a licenced landfill site.	ASAP
<b>20 February 2024</b>	Environmental Management Programme Condition 18	Any fuel, oil or hazardous substance spills must be cleaned-up immediately and discarded correctly.	A hydrocarbon spill was observed at the Reservoir during the February Audit. It was indicated that this needs to be managed as per the spill management plan in place.	Drip trays or any form of oil absorbent material must be placed underneath vehicles/machinery and equipment when not in use. Drip-Trays must be appropriately stored as to ensure no contamination to the environment.	ASAP
<b>20 February 2024</b>	Environmental Management Programme Condition 19	Drip trays or any form of oil absorbent material must be placed underneath vehicles/machinery and equipment when not in use. All contaminated soil / yard stone shall be treated in situ or removed and be placed in containers.	It was observed that drip trays are placed under some equipment on site, however some generators/pumps		ASAP



Date of finding	Document & Condition Number	Condition / Commitment	Finding	Required Action	Closeout Date
20 February 2024	Environmental Management Programme Condition 26	<p>A hydrocarbon spill management plan must be put in place to ensure that should there be any chemical spill out or over that it does not run into the surrounding areas.</p> <p>The Contractor shall be in possession of an emergency spill kit that must always be complete and available on site.</p> <p>Drip trays or any form of oil absorbent material must be placed underneath vehicles/machinery and equipment when not in use. No servicing of equipment on site unless necessary. All contaminated soil / yard stone shall be treated in situ or removed and be placed in containers.</p> <p>Appropriately contain any generator diesel storage tanks, machinery spills (e.g. accidental spills of hydrocarbons oils, diesel etc.) in such a way as to prevent them leaking and entering the environment. Construction activities and vehicles could cause spillages of lubricants, fuels and waste material potentially negatively affecting the functioning of the ecosystem. All vehicles and equipment must be maintained, and all re-fuelling and servicing of equipment is to take place in demarcated areas outside of the project area.</p>	were noted to be operated without drip trays.		ASAP
20 February 2024	Environmental Management Programme Condition 59	All chemicals and toxicants to be used for the construction must be stored in a bunded area			ASAP

Date of finding	Document & Condition Number	Condition / Commitment	Finding	Required Action	Closeout Date
20 February 2024	Environmental Management Programme Condition 88	Appropriately contain any generator diesel storage tanks, machinery spills (e.g. accidental spills of hydrocarbons oils, diesel etc.) or construction materials on site (e.g. concrete) in such a way as to prevent them leaking and entering the wetland areas.			ASAP
20 February 2024	Environmental Management Programme Condition 36	Compilation of and implementation of an alien vegetation management plan.	During the audit undertaken in February 2024 Alien and Invasive species were found along the pipeline route as well as at the Spitskop Pump Station.	All alien invasive species shall be cleared from site and disposed off at a landfill registered to handle such waste.	ASAP
20 February 2024	Environmental Management Programme Condition 74	Promptly remove all alien and invasive plant species that may emerge during construction (i.e. weedy annuals and other alien forbs) must be removed.			ASAP
20 February 2024	Environmental Management Programme Condition 46	A minimum of one toilet must be provided per 10 persons. Portable toilets must be pumped dry to ensure the system does not degrade over time and spill into the surrounding area	There are ablation facilities at the Steelport Industrial Park, and chemical toilets are available at the Spitskop Pump Station and Reservoir Site.	A minimum of one toilet must be provided per 10 persons. Portable toilets must be pumped dry to ensure the system does not degrade over time and spill into the surrounding area.  Portable Toilets to move with construction activities.	ASAP
17 October 2023 14 November 2023 16 January 2024 20 February 2024	Environmental Management Programme Condition 80	Adequate sanitary facilities and ablutions on the servitude must be provided for all personnel throughout the project area. Use of these facilities must be enforced (these facilities must be kept clean so that they are a desired alternative to the surrounding vegetation).	No chemical toilets were observed along the pipeline route currently being constructed. LWUA is advised that chemical toilets should be moved daily with construction activities and must be located outside sensitive areas. The ablation facilities are serviced on a weekly basis by Talisman Hire. Proof of these services was provided to the audit team.		ASAP
16 January 2024 20 February 2024	Environmental Management Programme Condition 91	Provide appropriate sanitation facilities during construction and service them regularly. These must be beyond the wetland and buffer area.			ASAP

Date of finding	Document & Condition Number	Condition / Commitment	Finding	Required Action	Closeout Date
18 July 2023 15 August 2023 19 September 2023 17 October 2023 14 November 2023 6 December 2023 16 January 2024 <b>20 February 2024</b>	Environmental management Programme Condition 56	Reduce the disturbance footprint and the unnecessary clearing of vegetation on either side of the trench as far as possible when traversing wetlands.	During the audit undertaken in July, August, September, October, November, December 2023, January 2024 and this audit (February 2024) it was observed that micro-pegs have been placed along the pipeline route as to ensure all activities only take place in designated areas.	LWUA to take cognisance that the disturbance footprint and the unnecessary clearing of vegetation on either side of the trench must be rehabilitated immediately in the wetland area.	<b>ASAP</b>
18 July 2023 15 August 2023 19 September 2023 17 October 2023 14 November 2023 6 December 2023 16 January 2024 <b>20 February 2024</b>	Environmental management Programme Condition 58	Load wetland spatial data onto a GPS and use it to mark out the positions where the pipeline will enter and exits the prescribed buffer on the boundary of a wetland. Try to reduce the disturbance footprint and the unnecessary clearing of vegetation on either side of the trench as far as possible when traversing wetlands.	Construction activities started within the buffer or boundary of the wetland in July 2023, however the clearance of vegetation was measures as approximately 30 m. The EMPr states that clearance of vegetation must be limited to a 25m corridor along the pipeline route, and 15m (servitude) in the wetland area and associated buffer zone of 15m.		<b>ASAP</b>
18 July 2023 15 August 2023 19 September 2023 17 October 2023 14 November 2023 6 December 2023 16 January 2024 <b>20 February 2024</b>	Environmental Management Programme Condition 78	Minimize unnecessary clearing of vegetation.			<b>ASAP</b>

**Table 5:3: Register of non-compliances that have been closed out.**

<b>Date of finding</b>	<b>Document &amp; Condition Number</b>	<b>Condition / Commitment</b>	<b>Finding</b>	<b>Required Action</b>	<b>Closeout Date</b>
18 October 2022	Environmental Authorisation: Condition 30	Records relating to monitoring and auditing must be kept on site and made available for inspection to any relevant and competent authority in respect of this development.	A copy of the September 2022 (Pre-construction) environmental audit report was not placed in the on-site compliance folder. No inspection by the competent authority has been undertaken to date (at the time of the environmental audit).	Esor to place a copy of all environmental audit reports and proof of submission thereof to the competent authority (DFFE) in the on-site compliance file.	<b>15 November 2022</b>
18 October 2022	Environmental Authorisation: Condition 47.1	A copy of this Environmental Authorisation, the audit and compliance monitoring reports, and the approved EMPr, must be made available for inspection and copying – at the site of the authorised activity;	Copies of the Environmental Authorisation, EMPr and General Authorisation are included in the on-site compliance file.  A copy of the September 2022 (Pre-construction) environmental audit was not included in the on-site compliance file.	Esor to place a copy of all environmental audit reports and proof of submission thereof to the competent authority (DFFE) in the on-site compliance file.	<b>15 November 2022</b>
15 & 16 November 2022	Environmental Authorisation: Condition 46	An integrated waste management approach must be implemented that is based on waste minimisation and must incorporate reduction, recycling, re-use and disposal where appropriate. Any solid waste must be disposed of at a landfill licensed in terms of Section 20 (b) of the National Environmental Management Waste Act, 2008 (Act No. 59 of 2008).	No permit with an accredited landfill site was provided to the audit team or agreement with Steelpoort Industrial Park to dispose of waste within their skips.  Waste was found in boxes at the on-site offices and flies were observed around these boxes	Esor to obtain a permit to dispose of waste at an accredited landfill site. If waste is to be placed within the skip at the Steelpoort industrial park, the permit that the industrial park has for the landfill site must be provided as well as an agreement that Esor is allowed to dispose of construction waste within these skips.	<b>6 December 2022</b>
15 & 16 November 2022	Environmental Management Programme Condition 35	Waste management must be a priority and all waste must be collected and stored adequately. It is recommended that all waste be removed from site on a weekly basis to prevent rodents and pests entering the site		Proof must be provided that adequate waste bins have been made available at the site offices	<b>6 December 2022</b>

Date of finding	Document & Condition Number	Condition / Commitment	Finding	Required Action	Closeout Date
15 & 16 November 2022	Environmental Management Programme Condition 47	The Contractor should supply sealable and properly marked domestic waste collection bins and all solid waste collected shall be disposed of at a licensed disposal facility. Waste management must be a priority and all waste must be collected and stored effectively.			6 December 2022
15 & 16 November 2022	Environmental Management Programme Condition 81	No dumping of construction material on site may take place within the wetland or buffer area. All material must be contained in waste skips and removed to designated (and licensed) facilities.			6 December 2022
15 & 16 November 2022	Environmental Management Programme Condition 82	All waste generated on site during construction must be adequately managed. Separation and recycling of different waste materials should be supported.			6 December 2022
15 & 16 November 2022	Environmental Management Programme Condition 87	Make sure all excess consumables and building materials / rubble is removed from site and deposited at an appropriate waste facility.			6 December 2022
15 & 16 November 2022	Environmental Management Programme Condition 46	A minimum of one toilet must be provided per 10 persons. Portable toilets must be pumped dry to ensure the system does not degrade over time and spill into the surrounding area			No ablution facilities for construction workers along the pipeline route
15 & 16 November 2022	Environmental Management Programme Condition 80	Adequate sanitary facilities and ablutions on the servitude must be provided for all personnel throughout the project area. Use of these facilities	6 December 2022		

Date of finding	Document & Condition Number	Condition / Commitment	Finding	Required Action	Closeout Date
		must be enforced (these facilities must be kept clean so that they are a desired alternative to the surrounding vegetation).			
15 & 16 November 2022	Environmental Management Programme Condition 91	Provide appropriate sanitation facilities during construction and service them regularly. These must be beyond the wetland and buffer area.			<b>6 December 2022</b>
December 2022	Environmental Management Programme Condition 86	At all crossings install sandbags on downstream side of the footprint to trap sediment until the site has been constructed and vegetation has re-established.	No sandbags were installed at crossings.	The contractor was informed that erosion protection such as sandbags must be implemented along drainage lines	<b>17 January 2023</b>
6 December 2022 17 January 2023	Environmental Management Programme Condition 26	<p>A hydrocarbon spill management plan must be put in place to ensure that should there be any chemical spill out or over that it does not run into the surrounding areas. The Contractor shall be in possession of an emergency spill kit that must always be complete and available on site.</p> <p>Drip trays or any form of oil absorbent material must be placed underneath vehicles/machinery and equipment when not in use. No servicing of equipment on site unless necessary. All contaminated soil / yard stone shall be treated in situ or removed and be placed in containers.</p> <p>Appropriately contain any generator diesel storage tanks, machinery spills (e.g. accidental spills of hydrocarbons oils, diesel etc.) in such a way as to prevent them leaking and entering the</p>	<p>The chemical storage cage was found to be unlocked at the Spitskop Pump Station</p> <p>Jerry cans storing petrol were identified to be incorrectly managed at the Steelpoort Industrial Park and within the site office along the pipeline route. The Jerry cans were not placed in a bunded area or drip tray.</p>	<p>The contractor was informed that all chemicals shall be stored and managed as per the Method statement received "Storage and use of Fuel Hazardous Poisonous Substance" document number set as MET-ENV-017.</p> <p>All chemical and hazardous substances shall be stored in bunded areas and clearly marked.</p>	<b>14 February 2023</b>

Date of finding	Document & Condition Number	Condition / Commitment	Finding	Required Action	Closeout Date
		environment. Construction activities and vehicles could cause spillages of lubricants, fuels and waste material potentially negatively affecting the functioning of the ecosystem. All vehicles and equipment must be maintained, and all re-fuelling and servicing of equipment is to take place in demarcated areas outside of the project area.			
	Environmental Management Programme Condition 59	All chemicals and toxicants to be used for the construction must be stored in a bunded area			<b>14 February 2023</b>
17 January 2023 14 February 2023	Environmental Management Programme Condition 36	Compilation of and implementation of an alien vegetation management plan.	During the January and February audit Alien and Invasive species were found along the pipeline route as well as at the Spitskop Pump Station.	The contractor was informed that all alien and invasive species must be removed as per the method statement "Alien Plant Clearing" document number set as MET-ENV-026.	<b>14 March 2023</b>
17 January 2023 14 February 2023	Environmental Management Programme Condition 74	Promptly remove all alien and invasive plant species that may emerge during construction (i.e. weedy annuals and other alien forbs) must be removed.			<b>14 March 2023</b>
14 February 2023	Environmental management Programme Condition 80	Adequate sanitary facilities and ablutions on the servitude must be provided for all personnel throughout the project area. Use of these facilities must be enforced (these facilities must be kept clean so that they are a desired alternative to the surrounding vegetation).	There are ablation facilities at the Steelpoort Industrial Park, and chemical toilets are available at the Spitskop Pump Station.  Chemical toilets were observed along the pipeline route currently being constructed. The construction team should note to move the ablation facilities as construction move along the pipeline to ensure construction worked do not have to walk a distance	LWUA to take cognisance that adequate sanitary facilities and ablutions on the servitude must be provided for all personnel throughout the project and moved along the construction route as construction commences	<b>14 March 2023</b>

Date of finding	Document & Condition Number	Condition / Commitment	Finding	Required Action	Closeout Date
			to reach the facility. These chemical toilets are located outside sensitive areas. The ablution facilities are pumped on a weekly by Talisman Hire proof of these services was provided to the audit team.		
17 January 2023 14 February 2023	Environmental Management Programme Condition 94	Ensure that topsoil is appropriately stored and re-applied during trench backfilling.	Most topsoil have been stored on flat areas where run-off will be minimal.  During the January, and February audit it was observed that topsoil was stockpiled within drainage lines.	The contractor was informed that these topsoil stockpiles must be removed from the drainage lines and located at least 100m from the drainage lines. The contractor was further notified that it must adhere to its method statement for Stream/river crossings, Document Number: MET-ENV-188, Revision 3.	<b>14 March 2023</b>
14 March 2023	Environmental Authorisation Condition 46	An integrated waste management approach must be implemented that is based on waste minimisation and must incorporate reduction, recycling, re-use and disposal where appropriate. Any solid waste must be disposed of at a landfill licensed in terms of Section 20 (b) of the National Environmental Management Waste Act, 2008 (Act No. 59 of 2008).	Waste is being disposed of at the Steelpoort Industrial Park within waste skips. Steelpoort Industrial Park has a permit to dispose of waste at the Burgersfort Landfill site at the time of this audit 14 March 2023, the landfill permit has expired and the latest agreement could not be provided. Waste bins were found to be overflowing and waste is not being adequately managed along the pipeline route.	The contractor to obtain an updated permit from Steelpoort Industrial Park with Burgersfort Landfill site as to allow the disposal of waste within the skip at the industrial park.  It is recommended that the contractor undertakes toolbox talks on waste management and general house keeping as to ensure all personnel are aware of the procedures in place for waste management on site.	<b>18 April 2023</b>
18 April 2023	Environmental Management Programme Condition 17	The Contractor shall be in possession of an emergency spill kit that must always be complete and available on site.	No emergency spill kit was found at the Reservoir	It is recommended that a spill kit be available at the reservoir site.	<b>16 May 2023</b>



Date of finding	Document & Condition Number	Condition / Commitment	Finding	Required Action	Closeout Date
14 March 2023 18 April 2023	Environmental Management Programme Condition 49	Refuse bins will be emptied and secured. Temporary storage of domestic waste shall be in covered waste skips. Maximum domestic waste storage period will be 10 days.	Waste is being disposed of at the Steelpoort Industrial Park within waste skips. Steelpoort Industrial Park has a permit to dispose of waste at the Burgersfort Landfill site at the time of this audit 18 April 2023. Waste is not being adequately managed along the pipeline route.	It is recommended that the contractor undertakes toolbox talks on waste management and general house keeping as to ensure all personnel are aware of the procedures in place for waste management on site.	16 May 2023
14 March 2023 18 April 2023	Environmental Management Programme Condition 50	Remove general waste generated frequently as to prevent the development of a breeding habitat for nuisance pests such as flies and attracting rodents and baboons.			16 May 2023
14 March 2023 18 April 2023	Environmental Management Programme Condition 87	Make sure all excess consumables and building materials / rubble is removed from site and deposited at an appropriate waste facility.			16 May 2023
14 March 2023 18 April 2023	Environmental Management Programme Condition 59	All chemicals and toxicants to be used for the construction must be stored in a bunded area	Diesel cans were identified to be incorrectly managed along the pipeline route. The Diesel cans were not placed in a bunded area or drip tray.  No emergency spill kit was found at the Reservoir	The contractor was informed that all chemicals shall be stored and managed as per the Method statement received "Storage and use of Fuel Hazardous Poisonous Substance" document number set as MET-ENV-017.  All chemical and hazardous substances shall be stored in bunded areas and clearly marked.	16 May 2023
18 April 2023	Environmental Management Programme Condition 80	Adequate sanitary facilities and ablutions on the servitude must be provided for all personnel throughout the project area. Use of these facilities must be enforced (these facilities must be kept clean so that they are a desired alternative to the surrounding vegetation).	There are ablution facilities at the Steelpoort Industrial Park, the Spitskop pump station and the reservoir. However, these facilities were found to be far away from where active construction were taking place.	These facilities must be moved to were active construction if taking place.	16 May 2023

Date of finding	Document & Condition Number	Condition / Commitment	Finding	Required Action	Closeout Date
18 April 2023 16 May 2023	Environmental Authorisation Condition 37	High visibility flags must be placed near any threatened / protected plants in order to avoid any damage or destruction of the species.	Protected trees were marked at the onset of the construction of the SE2 pipeline route (September/October 2022). In the April and May audits it was noted that some of these markers (danger tape) are still visible, but some Marula Trees were observed that were not marked. Photographic evidence can be found in Annexure C: Photo 42. It is recommended that another walkdown is undertaken and protected trees/plants clearly marked with high visibility flags/danger tape to ensure that the protected trees/plants are clearly visible.	LWUA to take cognisance that any threatened or protected plants need to be flagged to avoid damage or destruction to the species.  It is recommended that another walkdown is undertaken and protected trees/plants clearly marked with high visibility flags/danger tape to ensure that the protected trees/plants are clearly visible.	<b>20 June 2023</b>
17 January 2023 14 February 2023 14 March 2023 18 April 2023 16 May 2023	Environmental Management Programme Condition 26	A hydrocarbon spill management plan must be put in place to ensure that should there be any chemical spill out or over that it does not run into the surrounding areas. The Contractor shall be in possession of an emergency spill kit that must always be complete and available on site.  Drip trays or any form of oil absorbent material must be placed underneath vehicles/machinery and equipment when not in use. No servicing of equipment on site unless necessary. All contaminated soil / yard stone shall be treated in situ or removed and be placed in containers.  Appropriately contain any generator diesel storage tanks, machinery spills (e.g. accidental spills of hydrocarbons oils, diesel etc.) in such a way as to	The chemical storage cage was found to be unlocked at the Spitskop Pump Station.  During the audit undertaken in May 2023 it was observed that drip-trays are placed under machinery. However, drip-trays not in use were found to be inappropriately stored, these trays were left outside and the collection of contaminated stormwater was observed.	Drip-Trays must be appropriately stored as to ensure no contamination to the environment.  The contractor must ensure that chemical storage cages are kept locked as to ensure no unauthorised personnel can access these chemicals.	<b>20 June 2023</b>

Date of finding	Document & Condition Number	Condition / Commitment	Finding	Required Action	Closeout Date
		prevent them leaking and entering the environment. Construction activities and vehicles could cause spillages of lubricants, fuels and waste material potentially negatively affecting the functioning of the ecosystem. All vehicles and equipment must be maintained, and all re-fuelling and servicing of equipment is to take place in demarcated areas outside of the project area.			
17 January 2023 14 February 2023 14 March 2023 18 April 2023 16 May 2023	Environmental Management Programme Condition 88	Appropriately contain any generator diesel storage tanks, machinery spills (e.g. accidental spills of hydrocarbons oils, diesel etc.) or construction materials on site (e.g. concrete) in such a way as to prevent them leaking and entering the wetland areas.			<b>20 June 2023</b>
20 June 2023 18 July 2023	Environmental Authorisation Condition 30	Records relating to monitoring and auditing must be kept on site and made available for inspection to any relevant and competent authority in respect of this development.	During the audit undertaken in July 2023 the April and May Audit report were not found within the onsite compliance file	It is recommended that copies of all environmental audit reports be kept within the on-site compliance file.	<b>15 August 2023</b>
20 June 2023 18 July 2023	Environmental Authorisation Condition 47.1	A copy of this Environmental Authorisation, the audit and compliance monitoring reports, and the approved EMPr, must be made available for inspection and copying – at the site of the authorised activity;			<b>15 August 2023</b>

Date of finding	Document & Condition Number	Condition / Commitment	Finding	Required Action	Closeout Date
18 July 2023	Environmental Management Programme Condition 20	Demarcate the footprint area with high visibility plastic fencing.	During the audit undertaken in July 2023 it was observed that only some active construction sites have been demarcated with high visibility orange and yellow barrier netting. Sections of the pipeline was observed to not be demarcated with high visibility orange and yellow barrier netting.	LWUA to take cognisance that the footprint area must be demarcate with high visibility plastic fencing.	15 August 2023
18 July 2023	Environmental management Programme Condition 43	Any holes/deep excavations must be dug and planted in a progressive manner and shouldn't be left open overnight; Should the holes overnight they must be covered temporarily to ensure no small fauna species fall in.	During this audit (July 2023) Excavation activities are partially demarcated with high visibility orange and yellow barrier netting. A Deep hole was excavated at the Dwarsrivier and was observed to not be properly demarcated with high visibility orange and yellow netting.		15 August 2023
18 July 2023	Environmental Management Programme Condition 59	All chemicals and toxicants to be used for the construction must be stored in a bunded area	During the July 2023 Audit, Chemicals and petrol cans were found to be stored outside bunded areas.	LWUA to take cognisance that all chemicals and toxicants to be used for the construction must be stored in a bunded area.	15 August 2023
18 July 2023	Environmental management Programme Condition 88	Appropriately contain any generator diesel storage tanks, machinery spills (e.g. accidental spills of hydrocarbons oils, diesel etc.) or construction materials on site (e.g. concrete) in such a way as to prevent them leaking and entering the wetland areas.			15 August 2023
20 June 2023 18 July 2023	Environmental Management Programme Condition 46	A minimum of one toilet must be provided per 10 persons. Portable toilets must be pumped dry to ensure the system does not degrade over	There are ablution facilities at the Steelpoort Industrial Park, and chemical toilets are available at the Spitskop Pump Station and Reservoir Site. Chemical toilets were observed	LWUA to take cognisance that portable toilets must be pumped dry to ensure the system does not degrade over time and spill into the surrounding area.	15 August 2023

Date of finding	Document & Condition Number	Condition / Commitment	Finding	Required Action	Closeout Date
		time and spill into the surrounding area	<p>along the pipeline route currently being constructed. These chemical toilets are moved daily with construction activities and are located outside sensitive areas.</p> <p>The ablution facilities are serviced on a weekly basis by Talisman Hire. Proof of these services was provided to the audit team. However, ablution facilities were observed in areas where no construction is taking place.</p>		
18 July 2023 <b>15 August 2023</b>	Environmental Management Programme Condition 16	A hydrocarbon spill management plan must be put in place to ensure that should there be any chemical spill out or over that it does not run into the surrounding areas.	It was observed that drip-trays are placed only under some machinery. During this audit (August) a hydrocarbon spill was observed at the Lion Smelter Pipe Jacking.	LWUA to take cognisance that all a hydrocarbon spill management plan must be implemented. The spill must be cleaned up and disposed of properly. A spill kit must be kept on site for emergencies. Drip trays must be place under all equipment when not in use and no servicing or re-fuelling to take place in the project areas.	<b>19 September 2023</b>
18 July 2023 <b>15 August 2023</b>	Environmental management Programme Condition 52	Use wetland spatial data (shapefiles) to mark out the positions where the pipeline will enter and exit the 15 m buffer on the boundary of a wetland. Indicate delineated wetlands on site layout plans.	During the July and August 2023 Audit, the wetland and associated buffer was not clearly marked.	The wetland and associated 15m buffer area must be marked clearly.	<b>19 September 2023</b>

Date of finding	Document & Condition Number	Condition / Commitment	Finding	Required Action	Closeout Date
20 June 2023 18 July 2023 <b>15 August 2023</b>	Environmental Management Programme Condition 54	Signpost the area beyond the construction footprint where the pipeline traverses the wetlands as an environmentally sensitive area and keep all excavation, soil stockpiling, general access and construction activities out of this area.	Construction activities have started within the buffer or boundary of the wetland as noted during the current audit. No secondary activities (laydown areas, storage areas, ablution facilities) are located within the wetland areas or the wetland buffer areas.		<b>19 September 2023</b>
18 July 2023 <b>15 August 2023</b>	Environmental Management Programme Condition 55	Demarcate the 15 m buffer zone around wetlands on the ground (e.g. painted wooden poles/high visibility plastic fencing).	The wetland area is not demarcated beyond the construction footprint and the wetland and associated 15m buffer area was not clearly marked.		<b>19 September 2023</b>
18 July 2023 <b>15 August 2023</b>	Environmental Management Programme Condition 18	Any fuel, oil or hazardous substance spills must be cleaned-up immediately and discarded correctly.	LWUA understands that any hazardous spill must be cleaned-up immediately using the spill-kit found on site. Material must be disposed of at a licenced landfill facility. During this audit (August 2023), a Hydrocarbon spill was observed at pipejacking 2 near Lion Smelter.	LWUA is advised to take cognisance that any hazardous substance that is spilt must be cleaned up immediately.	<b>19 September 2023</b>
14 March 2023 18 April 2023 16 May 2023 20 June 2023 18 July 2023 15 August 2023 19 September 2023	Environmental Authorisation Condition 46	An integrated waste management approach must be implemented that is based on waste minimisation and must incorporate reduction, recycling, re-use and disposal where appropriate. Any solid waste must be disposed of at a landfill licensed in terms of Section 20 (b) of the National Environmental Management Waste Act, 2008 (Act No. 59 of 2008).	Waste bins have been provided at the Spitskop Pump Station, along the SE2 pipeline route, at the active Pipejacking Areas and at the Reservoir Site. These bins have been marked for a specific waste stream to ensure recycling and reuse where possible. During the August and September 2023 audit, wear and tear on the signages of the waste bins was noted at the pump station. The audit team recommended that these signs are replaced as to ensure all labels are easily identifiable.	It is recommended that the contractor undertakes toolbox talks on waste management and general house keeping as to ensure all personnel are aware of the procedures in place for waste management on site.  It is further recommended that signages are replaced as to ensure all labels are easily identifiable. This will ensure waste is disposed of in the correct bin.	<b>17 October 2023</b>

Date of finding	Document & Condition Number	Condition / Commitment	Finding	Required Action	Closeout Date
			<p>Poor housekeeping was noted at the Spitskop Pump Station Pipeline route and the Reservoir. The observation was specifically around sandbags used to safely store the pipes that were not stored appropriately as well as waste bins overflowing. Waste bins at the reservoir was found to be overflowing. It is suggested that all waste be removed from site and disposed of appropriately.</p> <p>Waste is being disposed of at the Steelpoort Industrial Park within waste skips. Steelpoort Industrial Park has a permit to dispose of waste at the Burgersfort Landfill site which is valid until December 2023.</p>		
17 January 2023 14 February 2023 14 March 2023 18 April 2023 16 May 2023 20 June 2023 18 July 2023 15 August 2023 19 September 2023	Environmental Management Programme Condition 4	All removed soil and material stockpiles must be protected from erosion, stored on flat areas where run-off will be minimised, and be surrounded by bunds.	Most topsoil have been stored on flat areas where run-off will be minimal.  During the December, January, February, March, April, May, June, July, August and this audit (September) it was observed that topsoil was stockpiled within drainage lines. During the September audit a pipe was found to be stored within the drainage line	The contractor was informed that these topsoil stockpiles must be removed from the drainage lines and located at least 100m from the drainage lines. The contractor was further notified that it must adhere to its method statement for Stream/river crossings, Document Number: MET-ENV-188, Revision 3.	<b>17 October 2023</b>
17 January 2023 14 February 2023 14 March 2023	Environmental Management Programme Condition 6	Ensure soil stockpiles and concrete / building sand are sufficiently safeguarded against rain wash.			<b>17 October 2023</b>

Date of finding	Document & Condition Number	Condition / Commitment	Finding	Required Action	Closeout Date
18 April 2023 16 May 2023 20 June 2023 18 July 2023 15 August 2023 19 September 2023					
17 January 2023 14 February 2023 14 March 2023 18 April 2022 16 May 2023 20 June 2023 18 July 2023 15 August 2023 19 September 2023	Environmental Management Programme Condition 64	Ensure soil stockpiles and concrete / building sand are sufficiently safeguarded against rain wash.			<b>17 October 2023</b>
14 March 2023 18 April 2023 16 May 2023 20 June 2023 18 July 2023 15 August 2023 19 September 2023	Environmental Management Programme Condition 86	At all crossings install sandbags on downstream side of the footprint to trap sediment until the site has been constructed and vegetation has re-established.	During the audit undertaken in September 2023 minimal Alien and Invasive species were found along the pipeline route as well as at the Spitskop Pump Station. The removal of alien and invasive species was noted as a work in progress, and small clusters could be found at the trench areas that have not been completely backfilled.	Remove Alien invasive plant species along the pipeline route, pump station and reservoir.	<b>17 October 2023</b>
18 April 2023 16 May 2023 20 June 2023	Environmental Management Programme Condition 36	Compilation of and implementation of an alien vegetation management plan.	During the audit undertaken in September 2023 minimal Alien and Invasive species were found along the	All alien invasive species shall be cleared from site and disposed off at a	<b>17 October 2023</b>



Date of finding	Document & Condition Number	Condition / Commitment	Finding	Required Action	Closeout Date
18 July 2023 15 August 2023 19 September 2023			pipeline route as well as at the Spitskop Pump Station. The removal of alien and invasive species was noted as a work in progress, and small clusters could be found at the trench areas that have not been completely backfilled.	landfill registered to handle such waste.	
18 April 2023 16 May 2023 20 June 2023 18 July 2023 15 August 2023 19 September 2023	Environmental Management Programme Condition 74	Promptly remove all alien and invasive plant species that may emerge during construction (i.e. weedy annuals and other alien forbs) must be removed.			<b>17 October 2023</b>
17 October 2023	Environmental Management Programme Condition 66	Do not situate any of the construction material laydown areas within any wetland or buffer areas.			<b>14 November 2023</b>
19 September 2023 17 October 2023	SAHRA Condition 6.1	With reference to the mitigation work noted above, a qualified archaeologist must be appointed to undertake the work in terms of the permit applied for as noted above;	A heritage consultant has not been appointed to apply for the required permits to rebury the bones found within the trench excavation.	It is recommended that a heritage consultant is appointed to undertake the required studies and reburial of the human remains.	<b>14 November 2023</b>
19 September 2023 17 October 2023	SAHRA Condition 6.2	If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;	On 7 August 2023, bones were discovered in the excavation trench at the Steelpoort Industrial Park. At the time of this audit (19 September 2023) an archaeologist has assessed the bones and confirmed they are human remains. SAHRA (Natasha Higgitt) was informed of this finding on 8 August 2023 and the actions implemented on site was confirmed to be sufficient, these include stopping construction in the vicinity and barricade the area.		<b>14 November 2023</b>

Date of finding	Document & Condition Number	Condition / Commitment	Finding	Required Action	Closeout Date
			SAHRA has given formal response to the findings on 11 September. The conditions are included in Table 4-4. During the September 2023 environmental audit, the bones found have been fenced off. Backfilling of the pipeline excavation has taken place on both sides of the bones find.		
19 September 2023 17 October 2023	Additional SAHRA conditions (11 September 2023) Condition 1,1	All identified graves must be fenced or demarcated and to include at least a 10 m buffer to avoid physical impact;	The grave has not been fenced or demarcated.	The grave must be clearly marked and fenced to ensure that construction activities are not affecting the identified grave. Family members must still be able to visit the grave.	<b>14 November 2023</b>
19 September 2023 17 October 2023	Additional SAHRA conditions (11 September 2023) Condition 2.2	If this is not a viable option, the remains should be exhumed, analysed and then reburied or sent to a formal repository for human remains	The human remains have not been reburied. A heritage consultant has not been appointed.	It is recommended that a heritage consultant is appointed to undertake the required studies and reburial of the human remains.	<b>14 November 2023</b>
19 September 2023 17 October 2023	Additional SAHRA conditions (11 September 2023) Condition 2.3	Regarding the identified human remains within the trench, SAHRA requests a full report of the find be submitted by an archaeologist i.e. location of the find with a map, surface indicators, possible construction alternatives, including the proposed mitigation measures.	A heritage consultant has not been appointed.		<b>14 November 2023</b>
14 March 2023 18 April 2023 16 May 2023 20 June 2023 18 July 2023 15 August 2023	Environmental Management Programme Condition 82	All waste generated on site during construction must be adequately managed. Separation and recycling of different waste materials should be supported.	Waste bins were noted as part of this audit at the Spitskop Pump Station, along the SE2 pipeline route at active construction zones and at the wetland crossing site. Only one waste bin could be found at the Pump station area where there are usually four bins for the separate waste streams.	It is recommended that the contractor undertakes toolbox talks on waste management and general house keeping as to ensure all personnel are aware of the procedures in place for waste management on site.	<b>6 December 2023</b>

Date of finding	Document & Condition Number	Condition / Commitment	Finding	Required Action	Closeout Date
<p>19 September 2023</p> <p>17 October 2023</p> <p>14 November 2023</p>			<p>All noted bins have been marked for a specific waste stream to ensure recycling and reuse where possible.</p> <p>Poor housekeeping was noted along the pipeline route. The observation was specifically around waste stockpiled along the route and a waste bin overflowing at the wetland area. It is suggested that all waste be removed from site and disposed of appropriately.</p> <p>Waste is being disposed of at the Steelpoort Industrial Park within waste skips. Steelpoort Industrial Park has a permit to dispose of waste at the Burgersfort Landfill site which is valid until December 2023.</p>	<p>It is further recommended that signages are replaced as to ensure all labels are easily identifiable. This will ensure waste is disposed of in the correct bin.</p>	
<p>17 October 2023</p> <p>14 November 2023</p>	<p>Environmental Management Programme Condition 91</p>	<p>Provide appropriate sanitation facilities during construction and service them regularly. These must be beyond the wetland and buffer area.</p>	<p>Chemical toilets were observed along the pipeline route currently being constructed; however it was noted that one active construction area did not have ablution facilities for the workers.</p> <p>LWUA is advised that chemical toilets should be moved daily with construction activities and must be located outside sensitive areas.</p> <p>The ablution facilities are serviced on a weekly basis by Talisman Hire. Proof of these services was provided to the audit team. .</p>	<p>Chemical toilets should be moved daily with construction activities and must be located outside sensitive areas.</p>	<p><b>6 December 2023</b></p>

Date of finding	Document & Condition Number	Condition / Commitment	Finding	Required Action	Closeout Date
17 October 2023 14 November 2023	Environmental Management Programme Condition 52	Use wetland spatial data (shapefiles) to mark out the positions where the pipeline will enter and exit the 15 m buffer on the boundary of a wetland. Indicate delineated wetlands on site layout plans.	At the time of this audit the wetland area and associated 15m buffer area was not clearly demarcated.	Clearly demarcate the 15 meter buffer of the wetland boundary within layout plans and on the ground.	6 December 2023
17 October 2023 14 November 2023	Environmental Management Programme Condition 55	Demarcate the 15 m buffer zone around wetlands on the ground (e.g. painted wooden poles/high visibility plastic fencing).			6 December 2023
19 September 2023 17 October 2023 14 November 2023	Environmental Management Programme Condition 88	Appropriately contain any generator diesel storage tanks, machinery spills (e.g. accidental spills of hydrocarbons oils, diesel etc.) or construction materials on site (e.g. concrete) in such a way as to prevent them leaking and entering the wetland areas.	During the audit undertaken in October 2023 it was observed that drip-trays are placed under machinery that is not in use. Petrol and diesel containers were found to be stored in drip-trays. However, some machinery such as generators, pumps and plant equipment were found to be operated / parked without drip trays present, especially in the wetland area.	LWUA to take cognisance that all diesel or hazardous storage must be within a bunded area.	6 December 2023
14 November 2023	Environmental Management Programme Condition 61	Keep the trench excavation neat and tidy.	During the audit undertaken in November 2023, excavation work at the trenches were found to be semi neat and tidy. Several empty bottles were found to be laying around at the excavation sites. There are lots of Sandbags along the pipeline route that is also laying around.	LWUA to take cognisance that the trench excavation must be kept neat and tidy.	6 December 2023
18 July 2023 15 August 2023 19 September 2023	Environmental Management Programme Condition 19	Drip trays or any form of oil absorbent material must be placed underneath vehicles/machinery and equipment when not in use. All contaminated soil / yard stone shall be treated in situ or removed and be placed in containers.	During the current audit, spill kits could be found at the Spitskop Pump Station and at the Reservoir Site.  It was also observed that drip-trays are placed under machinery that is not in use. Petrol and diesel containers were	LWUA is advised to take cognisance that any hazardous substance that is spilt must be cleaned up immediately.  Drip trays must be placed under machinery when not in use and under pumps or generators. Drip Trays must	16 January 2024

Date of finding	Document & Condition Number	Condition / Commitment	Finding	Required Action	Closeout Date
17 October 2023 14 November 2023 6 December 2023			found to be stored on drip-trays. However, some machinery such as generators were found to be operated without being placed on drip trays. Drip Trays were found not to be stored correctly after use and were found outside exposed to whether conditions. LWUA is advised to take cognisance that any hazardous substance that is spilt must be cleaned up immediately.	additionally be adequately stored within closed or bund areas as to ensure they are not exposed to weather conditions.	
17 October 2023 14 November 2023 6 December 2023	Environmental Management Programme Condition 54	Signpost the area beyond the construction footprint where the pipeline traverses the wetlands as an environmentally sensitive area and keep all excavation, soil stockpiling, general access and construction activities out of this area.	Construction activities are almost completed within the buffer or boundary of the wetland as noted during the current audit. At the time of this audit the chemical toilet was located outside the wetland area. A pump/generator was found to not be placed on a drip tray within the wetland area.	Ensure all secondary activities are restricted to outside the wetland area and prescribed buffer area.	<b>16 January 2024</b>
14 November 2023 6 December 2023 16 January 2024	Environmental Management Programme Condition 59	All chemicals and toxicants to be used for the construction must be stored in a bunded area	Storage of hazardous material was noted as an improvement with all chemical and toxicants stored within chemical cages or drip-trays.  During the audit undertaken in December 2023, it was found that a pump/generator was not placed on a drip tray.	A to take cognisance that all chemicals and toxicants to be used for the construction must be stored in a bunded area.	<b>16 January 2024</b>
17 October 2023 14 November 2023	Environmental Management Programme Condition 23	All laydown, chemical toilets etc. should be restricted to low sensitivity areas. Any materials may not be stored for extended periods of time and must be removed from the project area	There are ablation facilities at the Steelpoort Industrial Park, and chemical toilets are available at the Spitskop Pump Station, Reservoir Site and at the Wetland Area. All observed	Chemical toilets should be moved daily with construction activities and must be located outside sensitive areas.	<b>16 January 2024</b>

Date of finding	Document & Condition Number	Condition / Commitment	Finding	Required Action	Closeout Date
6 December 2023		once the construction phase has been concluded. No permanent construction phase structures should be permitted. No storage of vehicles or equipment will be allowed outside of the designated project areas.	chemical toilets are located outside sensitive areas, it was confirmed during this audit that the chemical toilet at the wetland construction site is situated outside the wetland boundary and buffer area. No Ablution facilities were found at active construction areas along the pipeline route.		
20 June 2023 18 July 2023 15 August 2023 19 September 2023 14 November 2023 6 December 2023	Environmental Management Programme Condition 26	A hydrocarbon spill management plan must be put in place to ensure that should there be any chemical spill out or over that it does not run into the surrounding areas. The Contractor shall be in possession of an emergency spill kit that must always be complete and available on site. Drip trays or any form of oil absorbent material must be placed underneath vehicles/machinery and equipment when not in use. No servicing of equipment on site unless necessary. All contaminated soil / yard stone shall be treated in situ or removed and be placed in containers. Appropriately contain any generator diesel storage tanks, machinery spills (e.g. accidental spills of hydrocarbons oils, diesel etc.) in such a way as to prevent them leaking and entering the environment. Construction activities and vehicles could cause spillages of lubricants, fuels and waste material potentially negatively affecting the functioning of the ecosystem. All vehicles and equipment must be	During the current audit, spill kits could be found at the Spitskop Pump Station and at the Reservoir Site.  It was also observed that drip-trays are placed under machinery that is not in use. Petrol and diesel containers were found to be stored on drip-trays. However, some machinery such as generators were found to be operated without being placed on drip trays. Drip Trays were found not to be stored correctly after use and were found outside exposed to whether conditions. LWUA is advised to take cognisance that any hazardous substance that is spilt must be cleaned up immediately.	LWUA is advised to take cognisance that any hazardous substance that is spilt must be cleaned up immediately.  Drip trays must be placed under machinery when not in use and under pumps or generators. Drip Trays must additionally be adequately stored within closed or bund areas as to ensure they are not exposed to weather conditions.	<b>16 January 2024</b>

Date of finding	Document & Condition Number	Condition / Commitment	Finding	Required Action	Closeout Date
		maintained, and all re-fuelling and servicing of equipment is to take place in demarcated areas outside of the project area.			
6 December 2023	Environmental Management Programme Condition 88	Appropriately contain any generator diesel storage tanks, machinery spills (e.g. accidental spills of hydrocarbons oils, diesel etc.) or construction materials on site (e.g. concrete) in such a way as to prevent them leaking and entering the wetland areas.			<b>16 January 2024</b>
17 October 2023 14 November 2023 6 December 2023	Environmental Management Programme Condition 46	A minimum of one toilet must be provided per 10 persons. Portable toilets must be pumped dry to ensure the system does not degrade over time and spill into the surrounding area			<b>16 January 2024</b>
6 December 2023	Environmental Management Programme Condition 36	Compilation of and implementation of an alien vegetation management plan.	During the audit undertaken in December 2023, large amounts of Alien and Invasive species and weeds were found along the pipeline route.	Remove alien and invasive species as per the ESOR Method Statement; "Alien Plant Clearing" with document number set as MET-ENV-026.	<b>16 January 2024</b>
6 December 2023	Environmental Management Programme Condition 74	Promptly remove all alien and invasive plant species that may emerge during construction (i.e. weedy annuals and other alien forbs) must be removed.			<b>16 January 2024</b>
17 October 2023 14 November 2023 6 December 2023	Environmental Management Programme Condition 53	Adhere to the prescribed wetland buffers for secondary activities. Restrict all secondary activities (e.g. laydown yards, storage areas, cement mixing and equipment) to outside of wetlands and their prescribed buffers.	A generator was found to not be placed on a drip tray within the wetland area.	LWUA to take cognisance that the site must restrict all secondary activities (e.g. laydown yards, storage areas, cement mixing and equipment) to outside of wetlands and their prescribed buffers.	<b>ASAP</b>

## **6 ANNEXURES**



## ***ANNEXURE A: DECLARATION***

I, Tyla Leigh Smith, declare that I –

- Act as the independent environmental practitioner for this environmental audit;
- Do not have and will not have any financial interest in the undertaking of the activity, other than remuneration for work performed in terms of the Environmental Impact Assessment Regulation 2014 (as amended);
- Undertake the environmental audit based on information provided to me by the environmental authorisation holder and appointed contractor, and additional information obtained during the environmental audit; and
- All the particulars furnished in this report, to the best of my knowledge, are true and correct.



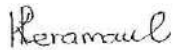
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Tyla Leigh Smith

Environmental Consultant

I, Kirthi Peramaul, declare that I –

- Act as the independent environmental practitioner for this environmental audit;
- Do not have and will not have any financial interest in the undertaking of the activity, other than remuneration for work performed in terms of the Environmental Impact Assessment Regulation 2014 (as amended);
- Undertake the environmental audit based on information provided to me by the environmental authorisation holder and appointed contractor, and additional information obtained during the environmental audit; and
- All the particulars furnished in this report, to the best of my knowledge, are true and correct.



---

Kirthi Peramaul

Environmental Consultant

# ANNEXURE B: ATTENDANCE REGISTER



Postnet Suite #745  
 Private Bag X1007  
 Lyttelton  
 1040  
 Cell: 082 782 4005  
 Fax: 086 634 3967  
 alta@avde.co.za

".....attitude of gratitude....."

Project Management, Peer Review, Advisory, Education

LWUA: SE2 Raw Water Pipeline and associated infrastructure  
 Environmental Control Officer – Audit

20 February 2024

FULL NAME	ORGANISATION	TELEPHONE	CELL NO	E-MAIL	SIGNATURE
J. Venster	ESOR	0829555443		VENSTER352@SMAIL.COM	
A. Noltje	ESOR	0649742044	0799256444	nalexzive@gmail.com	
Kirithi Paramanul	ANDE	0722564733		Kirithi@avde.co.za	
Tyke Leigh Smith	ANDE	0832564130	0129609457	tyla@avde.co.za	

".....we all live down stream....."

Company Registration Number: 2011/059764/23

## ANNEXURE C: PHOTOGRAPHS OF THE ENVIRONMENTAL AUDIT

Photo 1: Notification of environmental authorisation to stakeholders

**Suzanne van Rooy**

**From:** Suzanne van Rooy <suzanne@avde.co.za>  
**Sent:** Monday, 09 May 2022 12:54  
**Subject:** Notification of environmental authorisation: SE2 pipeline and associated infrastructure  
**Attachments:** Notification of EA.pdf; EA - 14-12-16-3-3-1-2442.pdf

Dear Stakeholder,

Please find a notification letter and environmental authorisation attached for Lebalelo Water User Association's proposed SE2 pipeline and associated infrastructure project. Please note that the appeals procedure is included in the notification letter, should you wish to appeal.

If you have any queries, please do not hesitate to contact me.

Kind regards,

*Suzanne van Rooy*

MPhil Environmental Management  
Pri.Sci.Nat (400378/11)  
Registered EAP (EAPASA Ref 2019/1079)



*Alta van Dyk Environmental Consultants cc (2011/059764/23)*  
VAT No: 4630259952      Postnet Suite # 745      Unit 3698  
Tel: 012 940 9457      Private Bag X 1007      4 Garcia Peak  
Fax: 086 634 3967      Lyttelton      Midlands Estate  
Cell: 078 196 6002      0140  
[www.altavandykenvironmental.co.za](http://www.altavandykenvironmental.co.za)

**Suzanne van Rooy**

**From:** Suzanne van Rooy <suzanne@avde.co.za>  
**Sent:** Thursday, 18 August 2022 10:55  
**Subject:** Notification of an environmental authorisation amendment: SE2 pipeline and associated infrastructure  
**Attachments:** Notification of EA Amendment.pdf; 14-12-16-3-3-1-2442-AM1.pdf

Dear Stakeholder

Attached please find a notification letter and amended environmental authorisation for Lebalelo Water User Association's proposed SE2 pipeline and associated infrastructure project. Please note that the appeals procedure is included in the notification letter, should you wish to appeal.

If you have any queries, please do not hesitate to contact me.

Kind regards,

*Suzanne van Rooy*

MPhil Environmental Management  
Pri.Sci.Nat (400378/11)  
Registered EAP (EAPASA Ref 2019/1079)



*Alta van Dyk Environmental Consultants cc (2011/059764/23)*  
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Fax: 086 634 3967      Lyttelton      Midlands Estate  
Cell: 078 196 6002      0140  
[www.altavandykenvironmental.co.za](http://www.altavandykenvironmental.co.za)

Photo 2: Confirmation from DFFE that no appeals were received



**forestry, fisheries  
& the environment**

Department:  
Forestry, Fisheries and the Environment  
REPUBLIC OF SOUTH AFRICA

Reference: 12/16/3/3/1/2442/AM1

Enquiries: C v Eeden.

Telephone: (012) 399 9323 Email: [cveeden@dffe.gov.za](mailto:cveeden@dffe.gov.za)

Mr Bertie Bierman  
Lebalelo Water User Association  
PO Box 2075  
POLOKWANE  
0700

Telephone Number: (012) 348 4654  
E-mail: [bierman@lebalelo.co.za](mailto:bierman@lebalelo.co.za)


Dear Mr Bierman

**POSSIBLE APPEALS AGAINST THE AMENDMENT OF AN ENVIRONMENTAL AUTHORISATION ON 16 AUGUST 2022 FOR THE CONSTRUCTION OF THE NEW LEBALELO WATER USER ASSOCIATION SOUTHERN EXTENSION 2 (SE2) RAW WATER PIPELINE AND ASSOCIATED INFRASTRUCTURE BETWEEN THE SPITSKOP PUMP STATION AND THE MOTOTOLO MINE NEAR STEELPOORT, WITHIN THE FETAKGOMO TUBATSE LOCAL MUNICIPALITY, LIMPOPO PROVINCE**

I refer to your query dated 12 September 2022 in the abovementioned regard.

It is hereby confirmed that no appeals have been lodged with the Minister of Forestry, Fisheries and the Environment pertaining to the EA for the project mentioned in the heading hereof.

Yours sincerely

  
Adv. Mokete Rakgogo  
Director: Appeals and Legal Review  
Date: 12/09/2022

**Photo 3: Proof of notification of commencement of construction to DFFE and ECO Appointment**

**Suzanne van Rooy**

**From:** Suzanne van Rooy <suzanne@avde.co.za>  
**Sent:** Tuesday, 13 September 2022 13:52  
**To:** 'michauke@dffe.gov.za'  
**Cc:** 'bierman@lebalelo.co.za'; 'Carel Taljaard'; 'Marius Fleischmann'; 'hartman3006@gmail.com'; 'Jeandré Barnard'; 'Etienne Clarke'; 'Tyla Leigh Smith'; 'Kirthi Peramaul'  
**Subject:** Notification: DFFE Ref. 14/12/16/3/3/1/2442  
**Attachments:** Notification of construction.pdf

Tracking:	Recipient:	Delivery:	Read:
	'michauke@dffe.gov.za'	Failed: 2022/09/13 13:52	
	'bierman@lebalelo.co.za'		
	'Carel Taljaard'		
	'Marius Fleischmann'		
	'hartman3006@gmail.com'		
	'Jeandré Barnard'		
	'Etienne Clarke'		
	'Tyla Leigh Smith'		
	'Kirthi Peramaul'		
	Kirthi Peramaul		Read: 2022/09/14 07:30
	hartman3006@gmail.com		Read: 2022/09/14 08:55

Good afternoon,

Attached please find a notification letter for Lebalelo Water User Association's appointment of an Environmental Control Officer and notification of commencement of construction.

Kind regards,

*Suzanne van Rooy*

MPhil Environmental Management  
 Ph.D. Nat (400378/11)  
 Registered EAP (EAPASA Ref 2018/1079)



Alta van Dyk Environmental Consultants cc (2011/059764/23)  
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 Fax: 086 634 3967 Lyttelton Midlands Estate  
 Cell: 078 196 6002 0140  
[www.altavandykenvironmental.co.za](http://www.altavandykenvironmental.co.za)

**Photo 4: Attendance Register for Environmental Training – AVDE**

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 Private Bag X1007  
 Lyttelton  
 1040  
 Tel: 012 940 9457  
 Fax: 086 634 3967  
 avde@avde.co.za



"...attitude of gratitude..."

Project Management, Peer Review, Advisory, Education

**SE2 Raw Water Pipeline and Associating Infrastructure  
 Pre-Construction Audit and Environmental Training**

Date: 16 September 2022

FULL NAME	ORGANISATION	TELEPHONE	CELL NO	E-MAIL	SIGNATURE
Charles Gogyan	ESOR	0825544310	0825544310	charlesgogyan@esor.co.za	<i>[Signature]</i>
Etienne Clarke	"	0794936309		etienne@esor.co.za	<i>[Signature]</i>
Macedonald Sedimo	ESOR	0739061142		jhanke@esor.co.za	<i>[Signature]</i>
Johann Klopfer	ESOR	084842226		jhanke@esor.co.za	<i>[Signature]</i>
Kirthi Peramaul	AVDE	0129409457		kirthi@avde.co.za	<i>[Signature]</i>
Tyla Smith	AVDE	0129409457	0832544136	tyla@avde.co.za	<i>[Signature]</i>
Suzanne v Rooy	AVDE		0781966002	Suzanne@avde.co.za	<i>[Signature]</i>



Photo 7: On-site compliance file

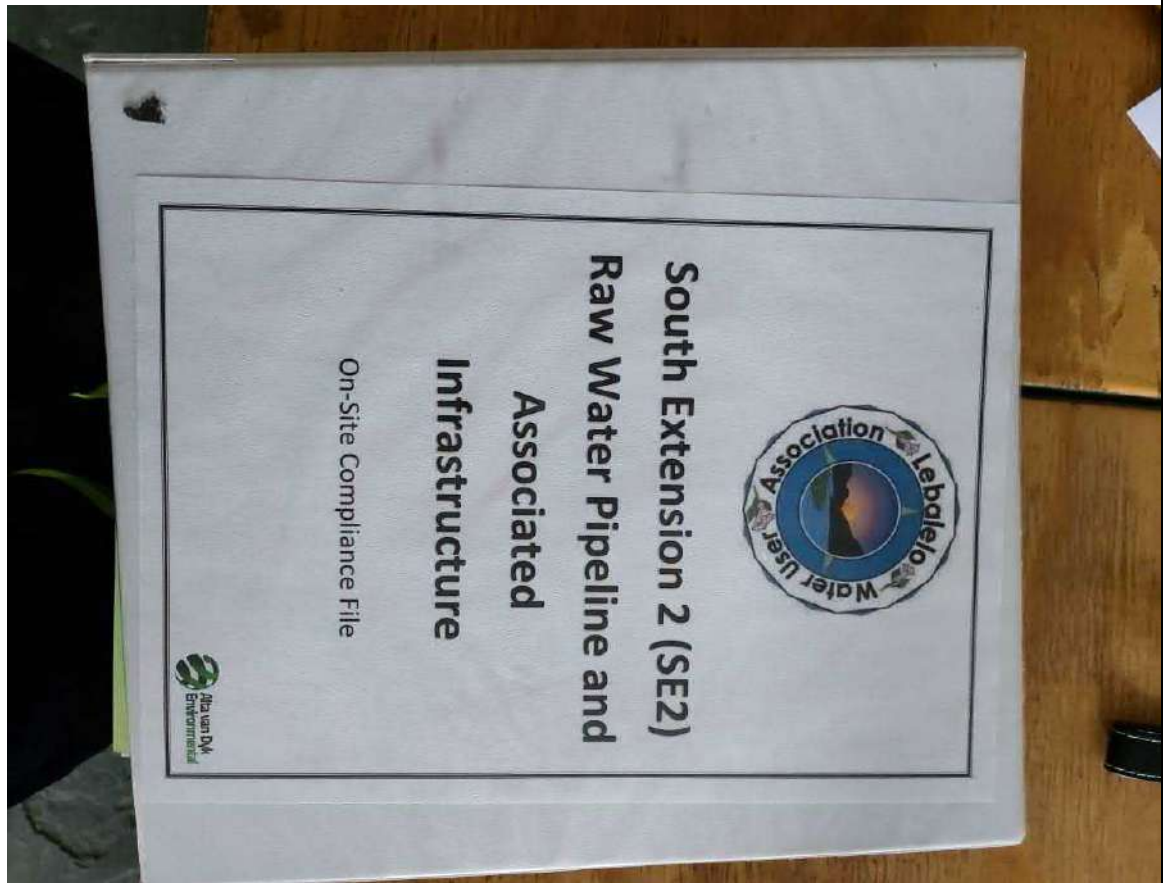


Photo 8: Final EMPr within on-site compliance file

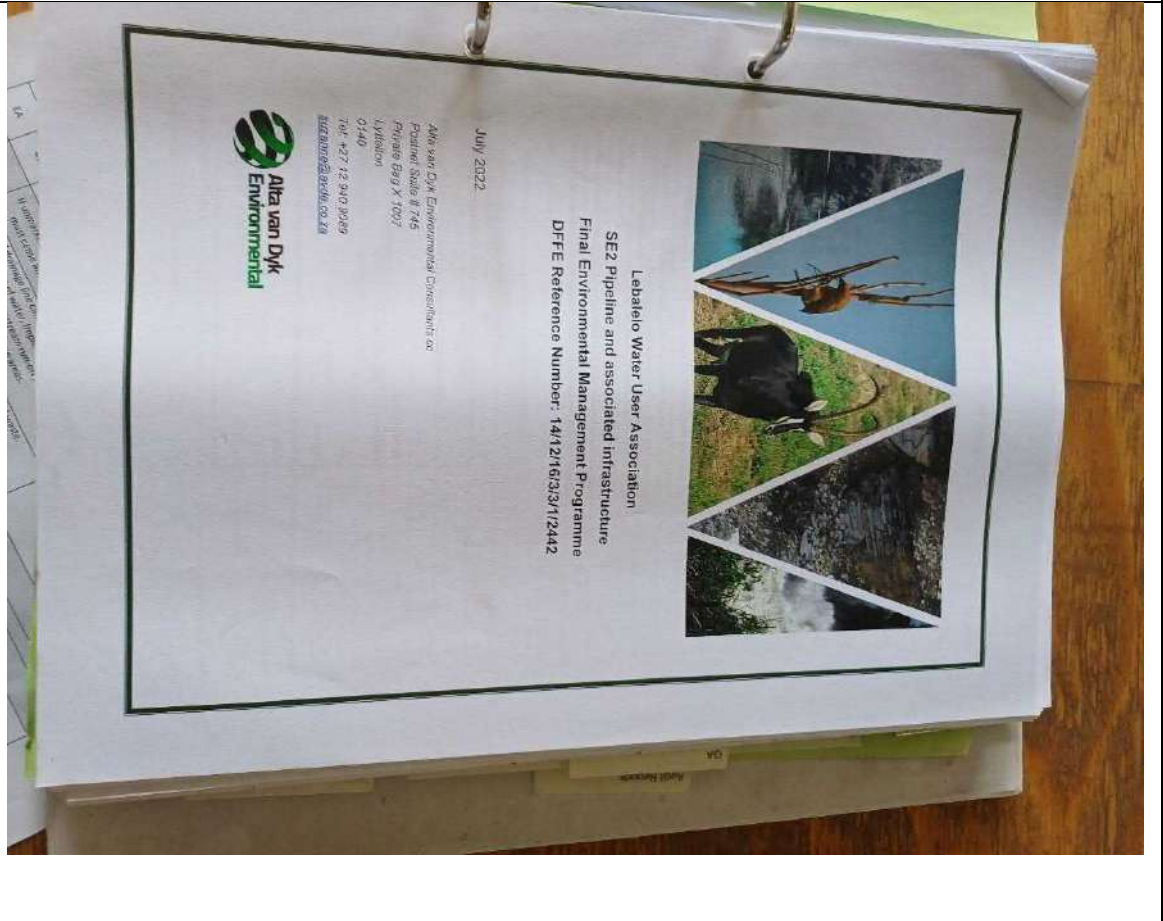






Photo 11: Permit for removal of protected plant species within on-site compliance file

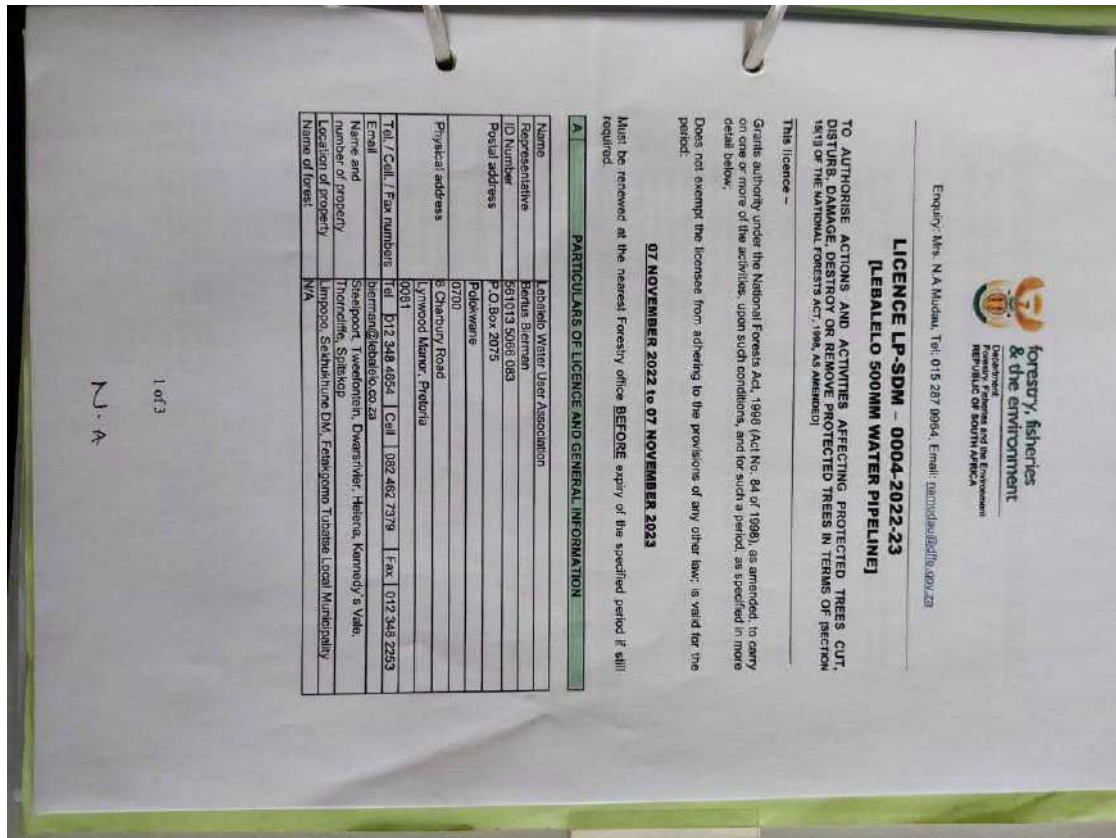


Photo 12: First construction audit report within on-site compliance file

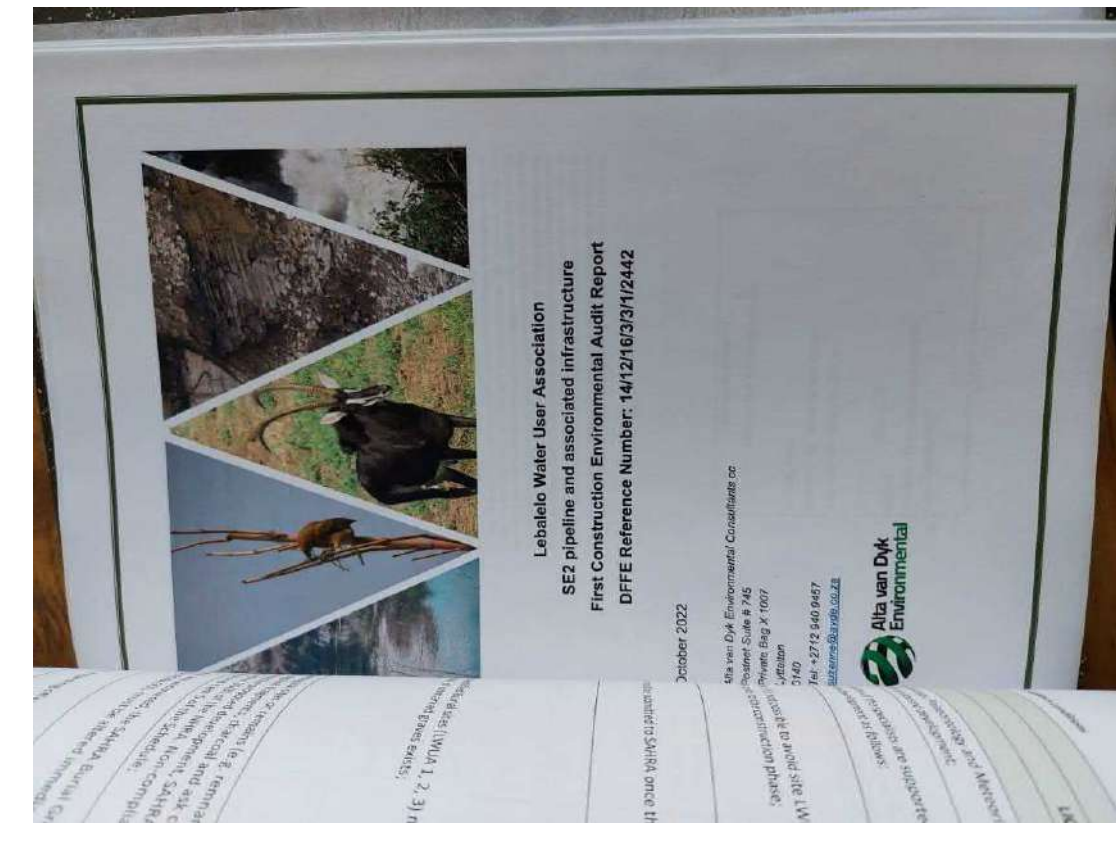
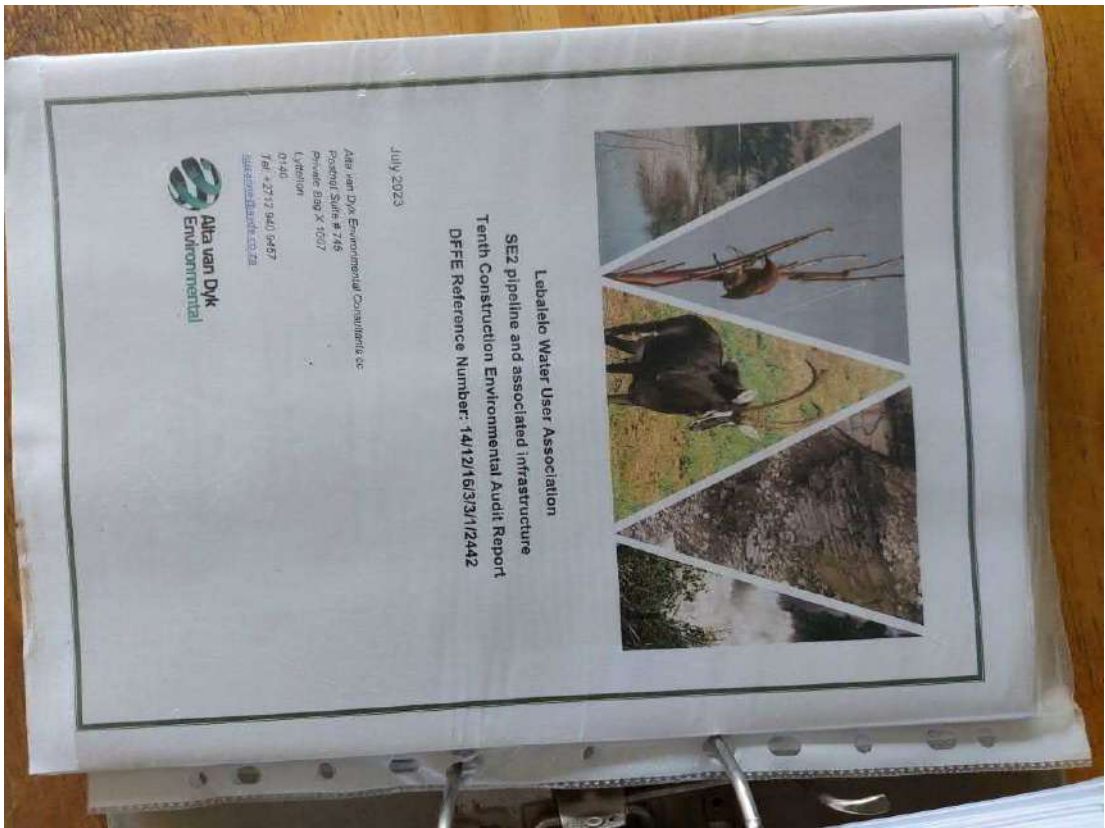
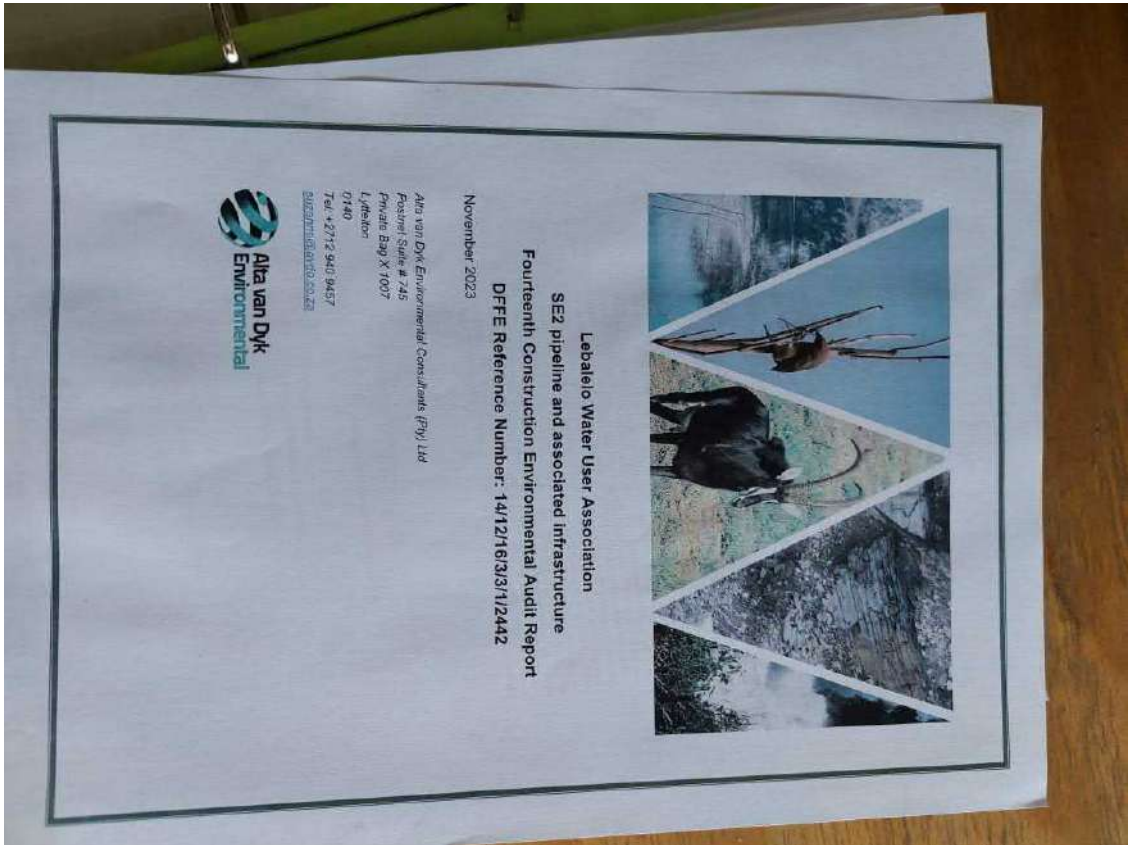


Photo 13: Construction audit report within on-site compliance file



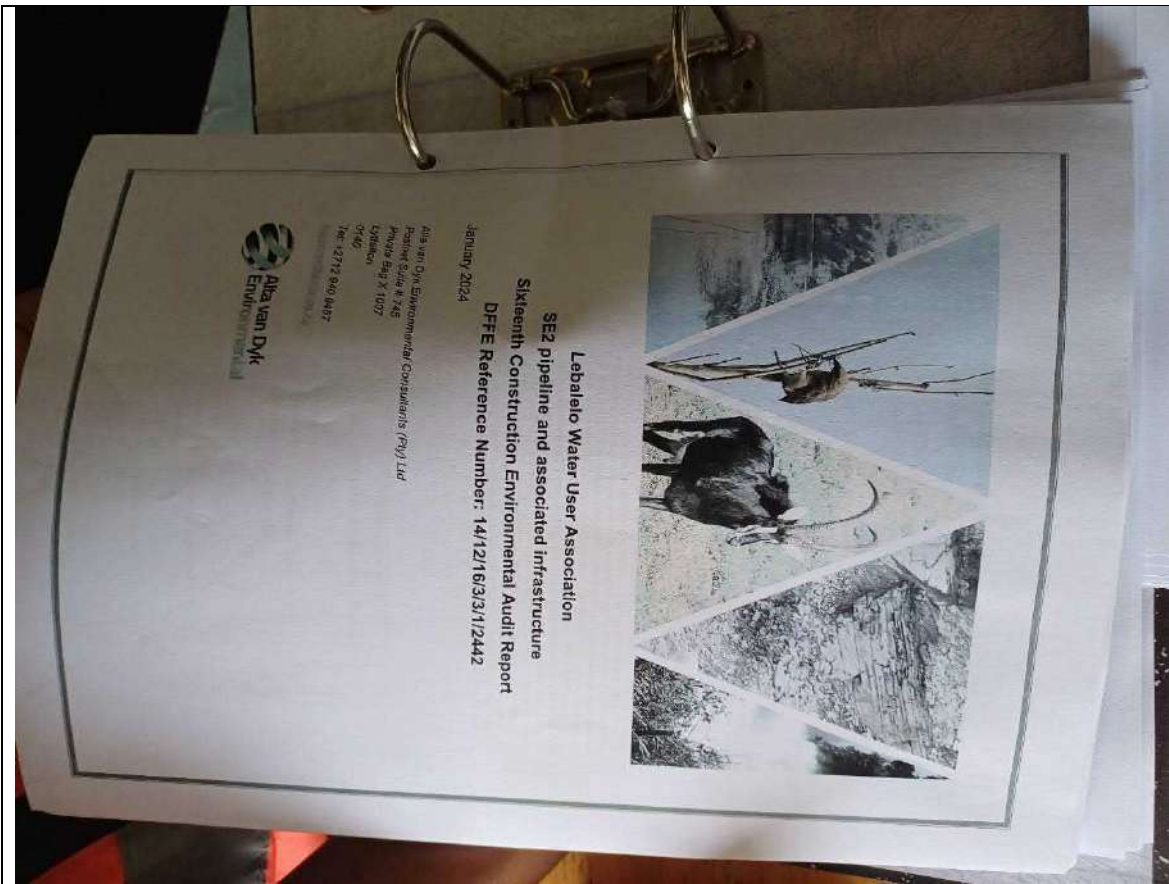


Photo 14: Micro-siting / pegging of the pipeline route





Photo 17: Stockpile of soil on site.





**Photo 18: Backfilling of Subsoil on the pipeline route**



**Photo 19: LWUA 1 – Buriel Site**



**Photo 20: LWUA 2 – Graveyard boundary area**



Photo 21: LWUA 3 – Burial Site



Photo 22: Newly identified grave (SP 12) [S24°50,3767' E030°07,2916']







**Photo 23: Email to inform SAHRA on SP 12**

**From:** Suzanne van Rooy <[suzanne@avde.co.za](mailto:suzanne@avde.co.za)>  
**Sent:** Friday, August 4, 2023 9:53 AM  
**To:** Natasha Higgitt <[nhiggitt@sahra.org.za](mailto:nhiggitt@sahra.org.za)>  
**Subject:** SE2 pipeline project - SAHRIS Case number: 17429

Dear Natasha,

The SE2 pipeline project (SAHRIS case number 17429) has reference.

The project received its environmental authorisation on 28 April 2022 and construction commenced on 27 September 2022.

A complaint was received from the Mokabane Royal Council in June 2023 that graves were disturbed at LWUA1 due to the construction activities. Subsequently, an archaeologist was appointed to assess. I have attached his report, as well as the original Heritage Impact Assessment undertaken for the project.

If you have any queries, please do not hesitate to contact me.

Kind regards,

*Suzanne van Rooy*

MPHJ Environmental Management  
Pr. Sci. Nat (A00378/11)  
Registered EAP (EAPASA Ref 2019/1079)



**Alta van Dyk  
Corporate Group**  
Oil & Gas • Environmental • Environmental Technology

Alta van Dyk Corporate Group

Email: [suzanne@avde.co.za](mailto:suzanne@avde.co.za) / Tel: 012 940 9457 / Fax: 086 634 3967 / Cell: 078 196 6002

**Photo 24: Bones discovered in Steelpoort Industrial Park Trench Excavation**

The image below is from the August 2023 Audit



The picture below is from the September 2023 Audit



The pictures below is from the October 2023 Audit



The picture below is from the November 2023 Audit

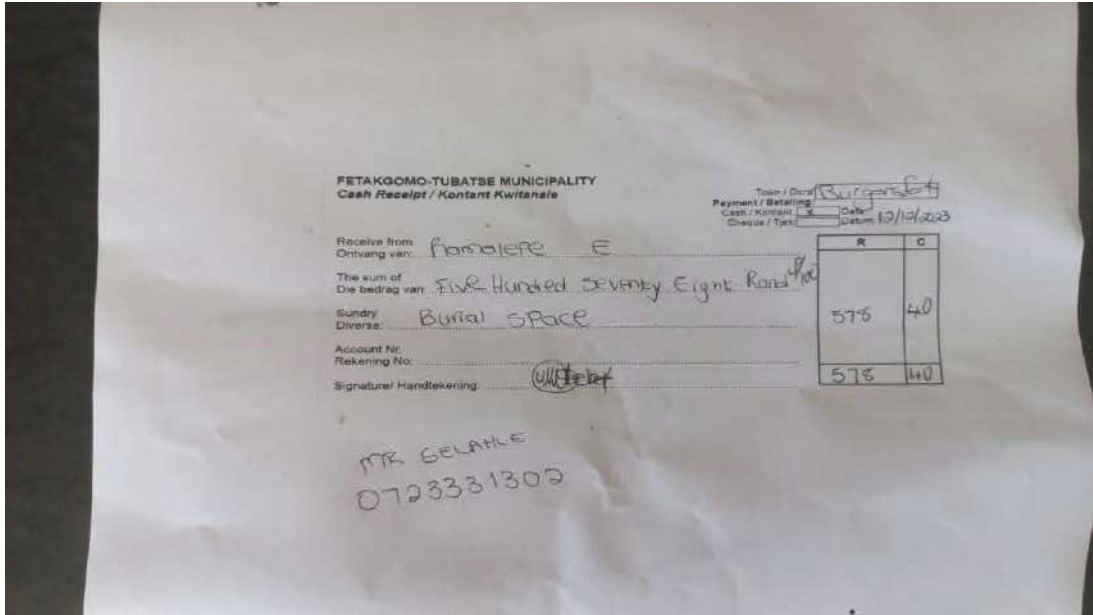


The picture below is from the December 2023 Audit



The picture below is from the January 2024 Audit. The bones have been exhumed and backfilling has occurred.





The picture below is from the February 2024 Audit. The area is closed out.



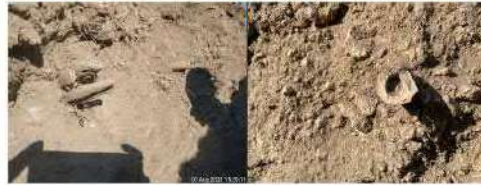
## Photo 25: Email to inform SAHRA on bones discovered

From: Suzanne van Rooy <suze@safrica.co.za>  
Sent: Tuesday, August 6, 2024 1:51 PM  
To: Ntshoko Higgs <nhiggs@safrica.co.za>  
Cc: 'Ntshoko Foranuel' <ntf@safrica.co.za>  
Subject: RE: SE2 pipeline project - SAHRA Case number: 21429

Hi Ntshoko,

Limpopo Water User Association's SE2 pipeline project (SAHRA case number 21429) has reference.

The construction team has found bones during excavation activities of the pipeline trench within the Steelport Industrial Park yesterday (07 August 2024). Coordinates: 24°52'0.40"S, 30°7'4.88"E. It is uncertain if the bones are human remains or other. Refer to the Google Earth image and photographs below.



The following actions have been undertaken:

- All construction activities at the site have ceased and the immediate vicinity barricaded.
- An archaeologist has been appointed to investigate and to confirm if the bones are human remains or other.

Once the report from the archaeologist is completed, I will upload onto the SAHRA website.

Please confirm if there are any other requirements from SAHRA to be followed following this finding?

Please note that I have tried to contact the SAHRA Burial Grounds and Graves (BSG) Unit (Phingahungwe Tshobane/Nqobalethu Madisa - 011 320 5450), as per the conditions of the SAHRA letter. However, I could not get through. Could you kindly send their email addresses?

## SAHRA Final Decision.

**SE2 Pipeline**

  
Suzanne van Rooy  
Deputy Director  
Department of Arts and Culture  
T: +27 21 462 1100 | F: +27 21 462 4100 | E: s.vanrooy@safrica.org.za  
South African Heritage Resources Agency | 111 Herengracht Street | Capetown  
P.O. Box 4037 | Cape Town | 8001  
www.sahra.org.za

Enquiries: Ntshoko Higgs  
Tel: 021 202 8690  
Email: nhiggs@safrica.org.za  
Case ID: 21364

Date: Friday, 8 February, 2024

**Final Decision**  
**In terms of Section 35(4) of the National Heritage Resources Act (Act 25 of 1999)**  
Permit holder: Anton Pelsier

As per condition 5 of the issued permit #4380, a Final Report on the excavation and relocation of unknown human remains from site #14779 at the Steelport Industrial Park, near Steelport, Limpopo Province has been submitted.

*Pelsier, A. 2024. Report on the Archaeological Investigation, Excavation & Relocation of Unknown Human Remains exposed by the SE2 Pipeline Trenching work, located at Site #14779 at the Steelport Industrial Park near Steelport, Limpopo Province.*

The report provides details on the excavation and relocation process. The remains of a possible adult male (most likely from the Later Iron Age, however no material cultural was identified with the remains) were successfully excavated and relocated to the Ohngstad Municipal Cemetery with the grave number 47/2024.

**Final Decision**

The SAHRA Development Applications Unit (DAU) is satisfied with the permit report and outcome of this process. The permit process is now closed.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully



Photo 26: Spitskop Pump Station Waste Management



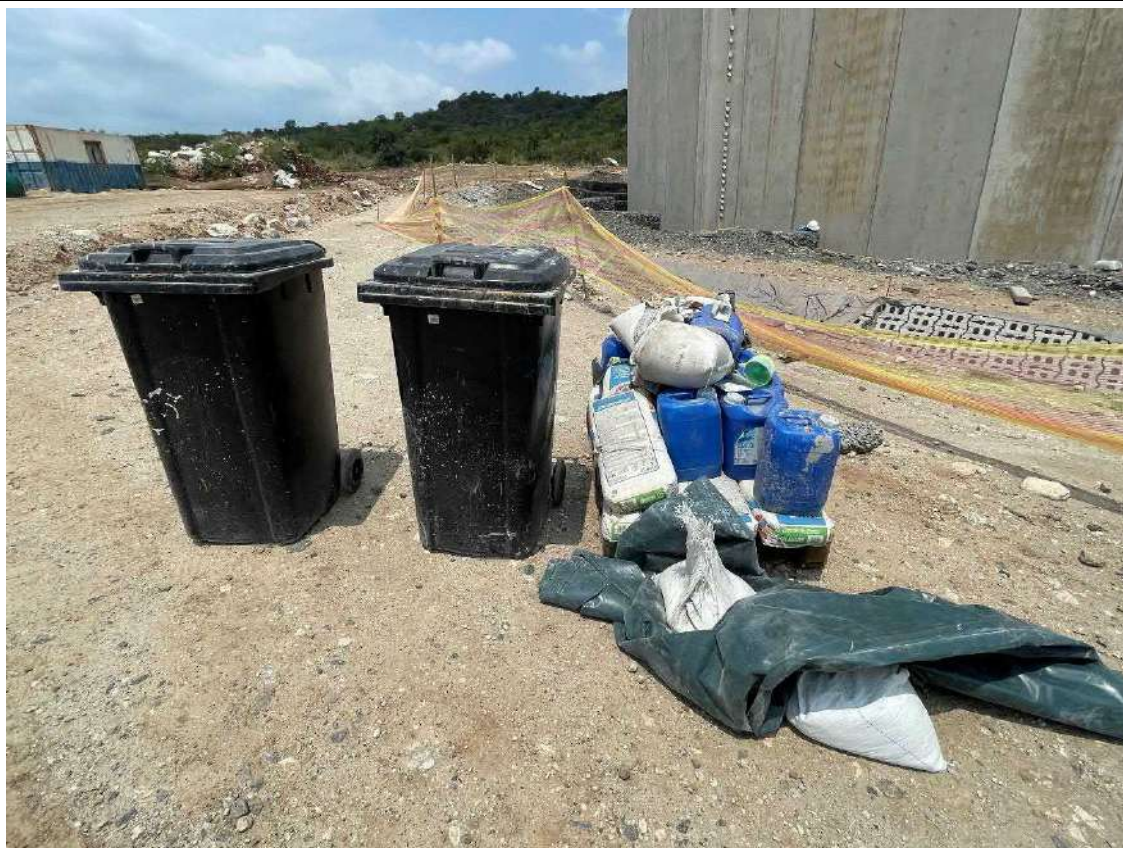




Photo 27: Waste storage skips at Steelpoort Office Park



Photo 28: Waste Management on site



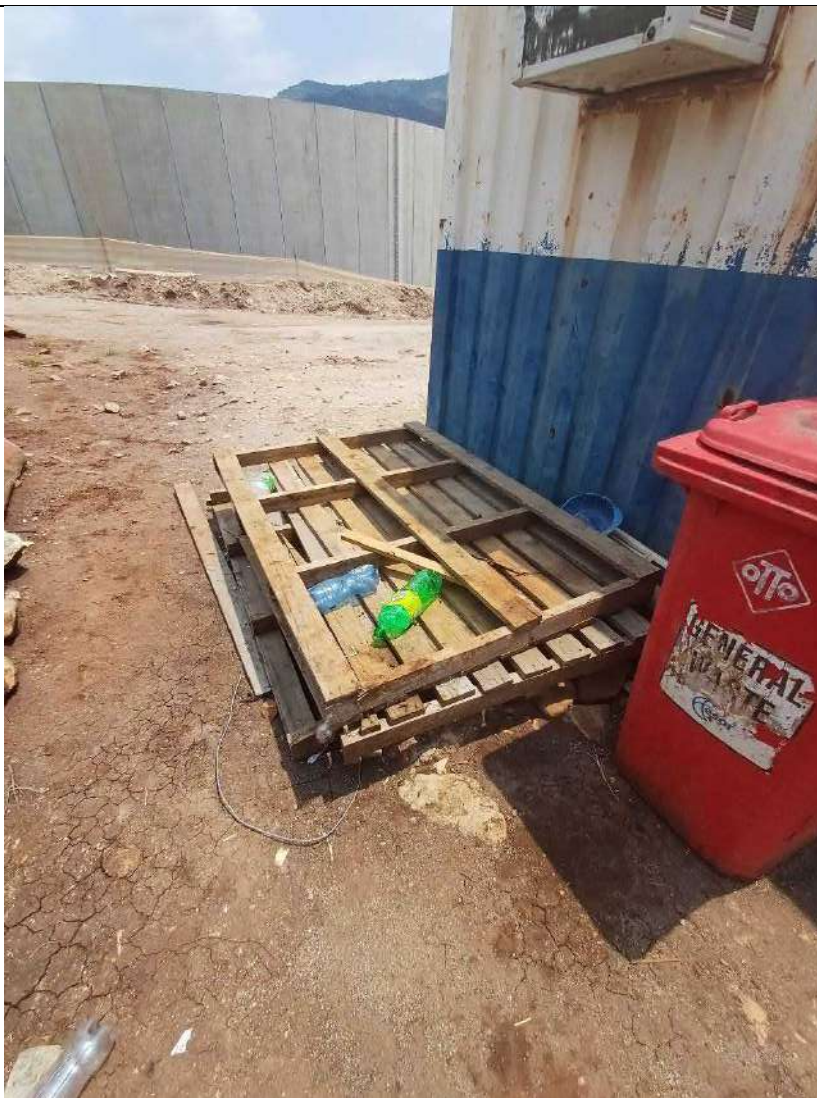


Photo 29: Waste Management along pipeline route









Photo 30: Landfill Agreement

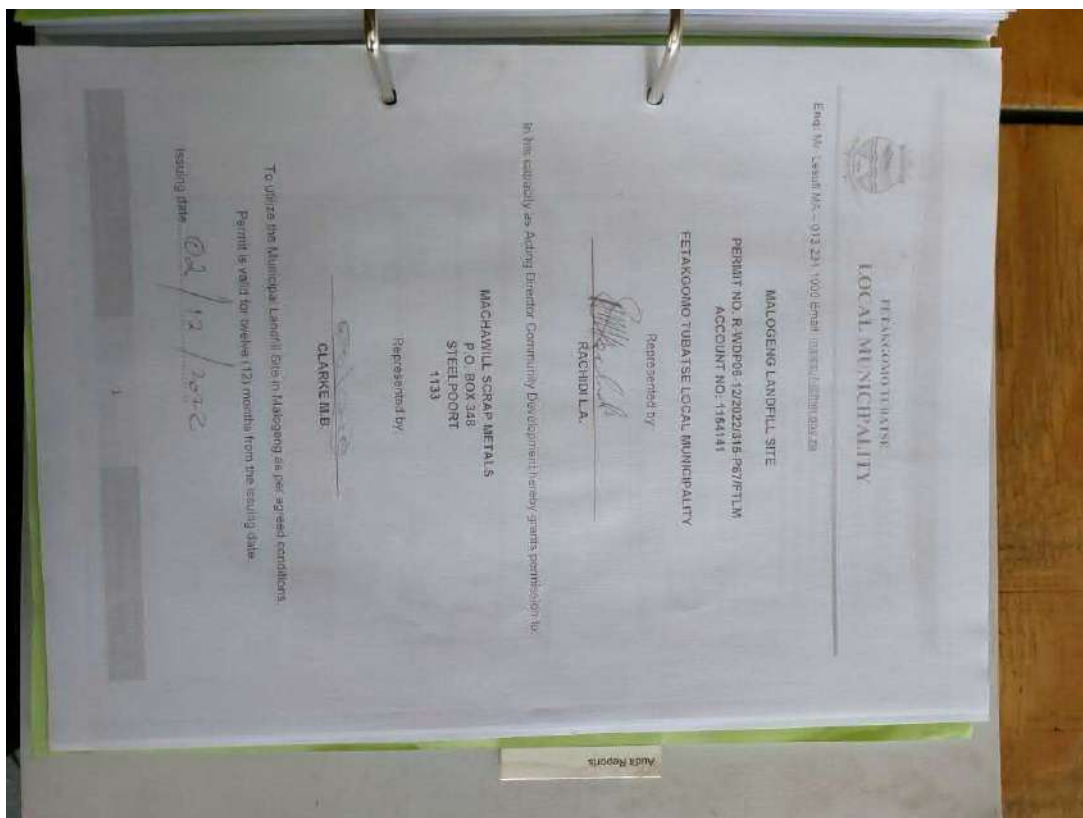


Photo 31: Soil removed from drainageline



Photo 32: Soil removed from drainageline



**Photo 33: Construction activities within pipeline servitude**



**Photo 34: Use of Drip trays on site**

**Drip Trays in Use**





Drip Trays Not in Use



Photo 35: Hydrocarbon spill kits on site



**Possible Hydrocarbon Spill**



**Photo 36: Construction site areas demarcated with reflector netting**





**Photo 37: Ablution facilities**

**Spitskop Pump Station**



**Reservoir Site**



**Pipeline Route (No Chemical Toilet Observed)**



Photo 38: Laydown Areas

Spitskop Pump Station



Reservoir Site



Photo 39: Chemical Storage Cage unlocked



Photo 40: MSDS Sheet

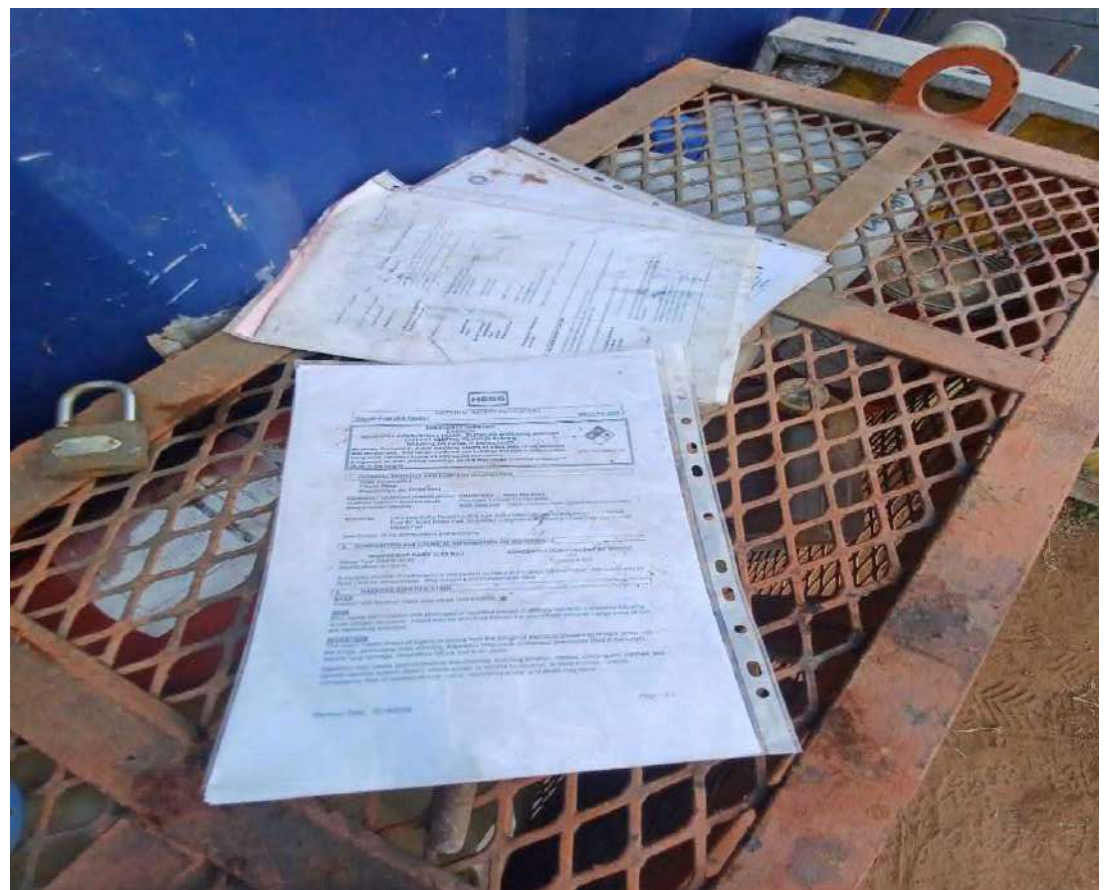


Photo 41: Fire Extinguisher Training undertaken

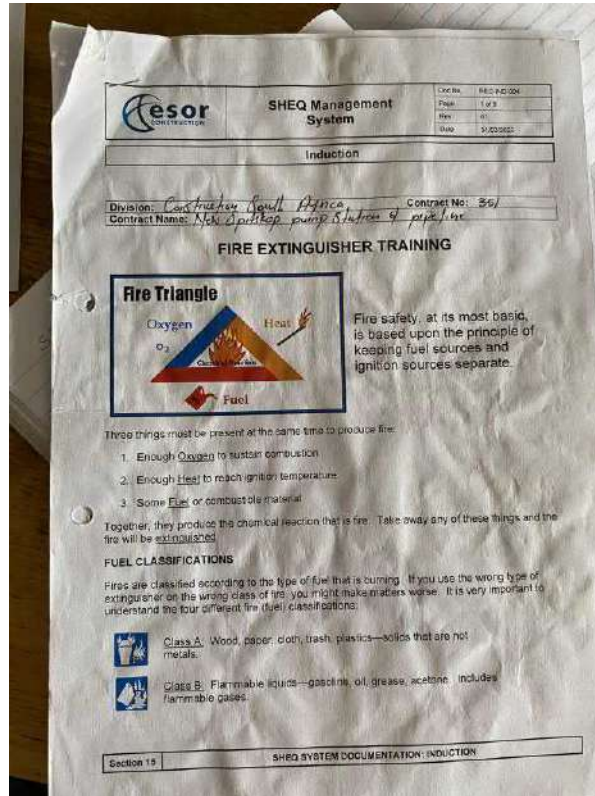


Photo 42: Fire Extinguishers

Reservoir:





**Spitskop Pump Station**



**Pipeline Route**



**Photo 43: Wetland area**

**Construction Activities**



**River channel re-established after construction**



Photo 44: Alien and Invasive Species found



Photo 45: Construction and safety signage on site



Photo 46: Construction signage on site



Photo 47: Excavation at Tweefontein mine



**Photo 48: Deep hole excavation at man hole site**



Photo 49: Talisman Hire service slips

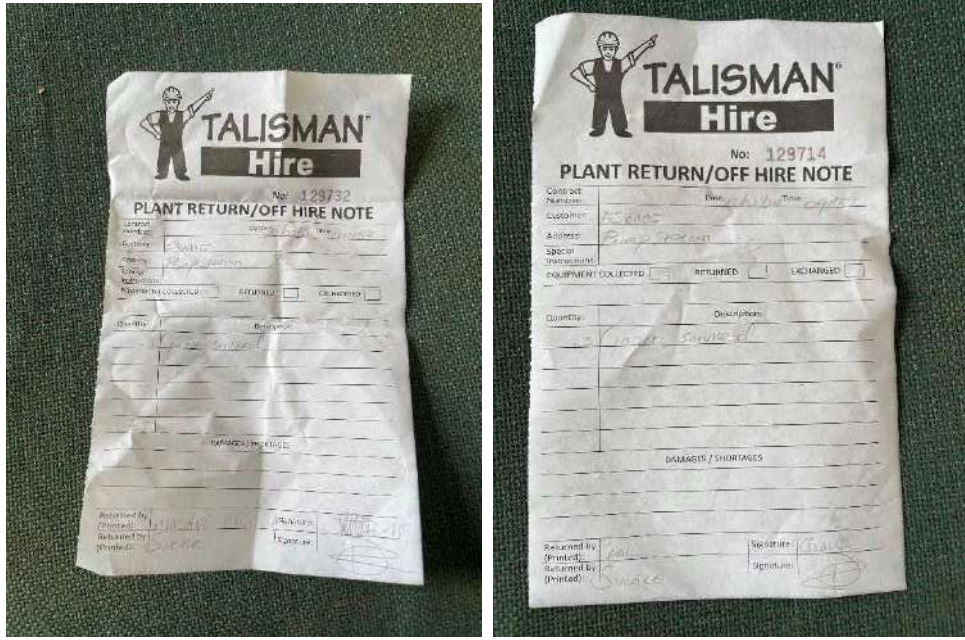


Photo 50: Local Water Bowser on Site

