

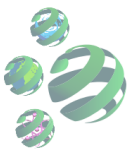
ALTA VAN DYK ENVIRONMENTAL CONSULTANTS (PTY) LTD

Project Reference Number: 131-001

DFFE Reference Number: 14/12/16/3/3/1/2442



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LEBALELO WATER USER ASSOCIATION

**SE2 PIPELINE AND ASSOCIATED INFRASTRUCTURE:
CLOSE OUT ENVIRONMENTAL AUDIT REPORT
NOVEMBER 2024**

PROJECT DETAILS

CLIENT NAME: LEBALELO WATER USER ASSOCIATION

PROJECT NAME: SE2 PIPELINE AND ASSOCIATED INFRASTRUCTURE

REPORT DETAIL: CLOSE OUT CONSTRUCTION AUDIT REPORT

**ALTA VAN DYK
CORPORATE GROUP
SUBSIDIARY** ALTA VAN DYK ENVIRONMENTAL CONSULTANTS (PTY) LTD



REPORT DATE: NOVEMBER 2024

VERSION CONTROL: FINAL

MAIN AUTHOR: SUZANNE VAN ROOY

REVIEWER: REATA COLYN

TECHNICAL DIRECTOR: ALTA VAN DYK

The opinions expressed in this Report have been based on the information supplied to Alta van Dyk Environmental (Pty) Ltd ("AvDE"), a subsidiary of Alta van Dyk Corporate Group ("AvDCG"), by company officials. The opinions in this Report are provided in response to a specific request from company officials to do so. AvDCG has exercised all due care in reviewing the supplied information. Whilst AvDCG has compared key supplied data with expected values, the accuracy of the results and conclusions from the review are entirely reliant on the accuracy and completeness of the supplied data. AvDCG does not accept responsibility for any errors or omissions in the supplied information and does not accept any consequential liability arising from commercial decisions or actions resulting from them. Opinions presented in this report apply to the site conditions and features as they existed at the time of AvDCG's investigations, and those reasonably foreseeable. These opinions do not necessarily apply to conditions and features that may arise after the date of this Report, about which AvDCG had no prior knowledge nor had the opportunity to evaluate.

APPROVED BY: REATA COLYN

A handwritten signature in black ink, appearing to read 'Reata Colyn', is positioned above the Alta van Dyk Corporate Group logo.



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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) SE2 raw water pipeline and associated infrastructure project. A Basic Assessment environmental authorisation process for the project was undertaken in terms of the National Environmental Management Act (Act No. 107 of 1998) (NEMA) (as amended), and the final Environmental Management Programme Report (EMPr) was submitted to the Department of Forestry, Fisheries and the Environment (DFFE) on 03 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.

As per the reporting requirements of the approved EMPr, monthly environmental audits are undertaken during the construction phase, to assess compliance with the conditions of the EA and commitments contained in the approved EMPr.

The SE2 pipeline and associated infrastructure project entailed the following:

- **Phase 1:** New pump station at existing Spitskop Pump Station, new 500mm raw water pipeline 15 km in length from Spitskop Pump Station to Dwarsrivier Pump Station; and a new concrete reservoir near the Dwarsrivier Pump Station (10 Mℓ).
- **Phase 2:** Solar panels (75 x 75m) within fenced area of Spitskop Pump Station. This is for a 0,5MW solar panel generation plant; new pump station adjacent to the current Dwarsrivier Pump Station; and a new 300 or 350 mm raw water pipeline 9 km in length from the new Dwarsrivier Pump Station to Mototolo Mine.

Only Phase 1 of the project has been constructed to date.

A pre-construction environmental audit was undertaken on 16 September 2022. Construction of Phase 1 commenced on 24 October 2022, after which monthly environmental audits were undertaken. Practical completion was received in mid-March 2024. On 26 April 2024, the Minister of Water and Sanitation, Mr Senzo Mchunu, commissioned the project. Due to malfunctions on the pipeline, construction activities were still ongoing along with rehabilitation activities. All construction activities have now been completed. Construction activities and backfilling of the pipeline trench have been completed, and the disturbed areas has been graded to allow for natural re-vegetation. This report is considered the close-out report upon completion of construction and rehabilitation activities.

This environmental audit report was undertaken in terms Appendix 7 of the Environmental Impact Assessment (EIA) Regulations (2014) of NEMA. The environmental audit was undertaken in order to comply with LWUA's commitments in the approved EMPr, the conditions stipulated in the EA and final comments received from the South African Heritage Resources Agency (SAHRA). This environmental audit report serves as the construction close-out audit report.

Audit Score

An overall compliance rating of 95% has been achieved for the November 2024 audit, which also serves as the close-out compliance audit for the project. Conditions and commitments from three documents were considered, namely the environmental authorisation, approved EMPr and Refer to the table below.

Document	% Compliance
Environmental authorisation	100%
EMPr	85%
SAHRA	100%

Document	% Compliance
Total % Compliance	95%

Audit Findings:

The following observations were made during the close-out environmental audit:

- Construction has been completed on site. No construction activities are taking place on site. All site offices and laydown areas have been removed. There were no chemical toilets on site.
- All waste has been removed from the site. No litter was observed along the constructed pipeline route at the time of the audit.
- It was noticed that some areas along the pipeline route and at the New Reservoir have not re-vegetated completely, and bare soil is still visible. The majority of the pipeline route have self re-vegetated.
- Re-vegetation of disturbed areas at the wetland area has taken place, but there are still some areas that have not naturally re-vegetated.
- There are two stockpiles of excavated material. It is understood that LWUA is planning to use this material to rehabilitate a donga area near its Borwa Reservoir.

Recommendations:

The following recommendation are made to ensure that rehabilitation of the disturbed area is completed as per the requirements of the EMPr:

- LWUA to ensure that all areas along the pipeline route and at the New Reservoir has been rehabilitated and completely re-vegetated. Inspections must be undertaken on a monthly basis until re-vegetation has been established completely.
- LWUA to ensure that bare soil areas are ripped to encourage the area to re-vegetate naturally. This should be done immediately as it is currently the rainy season and re-vegetation will occur naturally.
- In areas where re-vegetation is not occurring naturally, LWUA should use hydroseeding to ensure re-vegetation of the disturbed area.
- LWUA to undertake monthly inspections until disturbed areas have been rehabilitated, and alien invasive plant species must be removed.
- LWUA to obtain environmental authorisation and a Water Use Licence Application in order to use the stockpiled excavated material along the SE2 pipeline route for rehabilitation of the donga area near its Borwa Reservoir.

Recommendations, should LWUA commence with construction of Phase 2 of the project:

- LWUA to take cognisance that construction of Phase 2 of the project (pipeline between the New Reservoir and Mototolo Mine) must commence prior to 27 April 2032. If not, a new application for Environmental Authorisation must be made in order for Phase 2 to be undertaken.
- Should LWUA commence construction of Phase 2 of the project, construction must be completed within five years from the date of commencement of construction.
- Should LWUA commence construction of Phase 2 of the project, LWU must appoint an ECO for the construction phase of Phase 2 to ensure that the mitigation / rehabilitation measures are implemented.

DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER

Environmental Consultant

I, Suzanne van Rooy, 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.



Suzanne van Rooy

Environmental Consultant

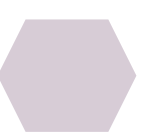


ABBREVIATIONS

APM	Archaeology, Palaeontology and Meteorites
AvDCG	Alta van Dyk Corporate Group
AvDE	Alta van Dyk Environmental
BGG	Burial Grounds and Graves
BIC	Bushveld Igneous Complex
DFFE	Department of Forestry, Fisheries and Environment
DWS	Department of Water and Sanitation
EA	Environmental Authorisation
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme Report
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



INTRODUCTION



1. INTRODUCTION

1.1 Scope and purpose of the report

This report presents the findings of the November 2024 environmental audit (Close-out construction audit) for Lebalelo Water User Association's (LWUA) SE2 raw water pipeline and associated infrastructure project (Phase 1).

A Basic Assessment environmental process for the 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.

A pre-construction environmental audit was undertaken on 16 September 2022. Construction of Phase 1 commenced on 24 October 2022, after which monthly environmental audits were undertaken. Practical completion was received in mid-March 2024. On 26 April 2024, the Minister of Water and Sanitation, Mr Senzo Mchunu, commissioned the project. Due to malfunctions on the pipeline, construction activities were still on-going along with rehabilitation activities. All construction activities have now been completed. Construction activities and backfilling of the pipeline trench have been completed, and the disturbed areas has been graded to allow for natural re-vegetation. This report is considered the close-out report upon completion of construction and rehabilitation activities.

This environmental audit report has been compiled in accordance with the requirements of Appendix 7 of the 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 audits.

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** below.

TABLE 1: DETAILS OF THE APPLICANT

Authorisation Holder	Lebalelo Water User Association
Address	Lynnwood Bridge Office Park 4 Davenry Street Lynnwood Manor, Pretoria 0081
Contact Person	Bertus Bierman
Telephone Number	082 462 7379
Email	bierman@lebalelo.co.za

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. The details of the contact person are shown in **Table 2** below.

TABLE 2: DETAILS OF THE APPLICANT

Authorisation Holder	Esor Construction (Pty) Ltd
Address	10 Flower Street Hermanus
Contact Person	Etienne Clarke
Telephone Number	079 493 6309
Email	etienec@esor.co.za

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

Suzanne van Rooy and Theya Henry of AVDE were responsible for the pre-close out construction environmental audit. The site visit was undertaken on 28 November 2024.

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

TABLE 3: DETAILS OF THE PERSONS WHO PREPARED THE ENVIRONMENTAL AUDIT REPORT.

Company	Alta van Dyk Environmental Consultants (Pty) Ltd (AvDE)
Postal Address	Postnet Suite # 745 Private Bag X 1007 Lyttelton 0140
Telephone Number	012 940 9457
Fax Number	086 634 3967
Environmental Control Officer	Suzanne van Rooy
Qualification	MPhil Environmental Management
Professional Registration	Pr.Sci.Nat (Reg Nr.400378/11) EAPASA Registered EAP (Ref 2019/1079)
Email Address	suzanne@avde.co.za
Environmental Control Officer	Tehya Henry
Qualification	B.Sc. Hons Environmental Science and Sustainability
Email Address	tehya@avde.co.za

Suzanne van Rooy holds a Master's Degree in Environmental Management from the University of Stellenbosch. In terms of professional affiliation, Suzanne is registered with the South African Council for Natural Science Professions (SACNASP - 400378/11) in Environmental Science field of practice. Suzanne is also a registered Environmental Assessment Practitioner (EAP) with the Environmental Assessment Practitioners Association of South Africa (EAPASA) (Ref Nr. 2019/1079). Suzanne's expertise is in the mining industry sector, focussing on Environmental Impact Assessments, Water Use Licence Applications, environmental performance assessments, water use licence audits, public participation and closure cost assessments. Her involvement in such projects varies from project management and co-ordination to the compilation and review of technical and environmental documents and reports. She has been involved in environmental authorisations for both underground and open cast mining operations, as well as the associated activities such as waste disposal facilities, conveyor routes, access roads, pollution control and other dams, undermining of wetlands and river crossings. She has also conducted various environmental feasibility reporting for potential mining projects.

Tehya Henry is a newly appointed Junior Environmental Assessment Practitioner with a solid academic foundation in Environmental Science and Sustainability from the University of Glasgow. Although at the early stages of her career, her education has equipped her with a thorough understanding and the required theoretical underpinnings necessary for effective environmental assessments and the ability to apply academically gained knowledge to real-world applications under the guidance of seasoned industry professionals. Her role involves actively participating in environmental related tasks to gain hands-on experience allowing for professional growth through a proactive approach to learning from industry veterans positioning her as a valuable asset within their team.

Suzanne van Rooy and Tehya Henry 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 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 4.

TABLE 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
i)	Any other information requested by the competent authority.	No additional information has been requested by the competent authority



PROJECT BACKGROUND AND DESCRIPTION

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, as well as from the De Hoop Dam. 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, as well as from the Steelpoort River via De Hoop Dam.

2.2 SE2 pipeline and associated infrastructure project

LWUA proposed 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) was planned to 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 new pipeline (SE2) project entailed the following:

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).

Only Phase 1 have been constructed.

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

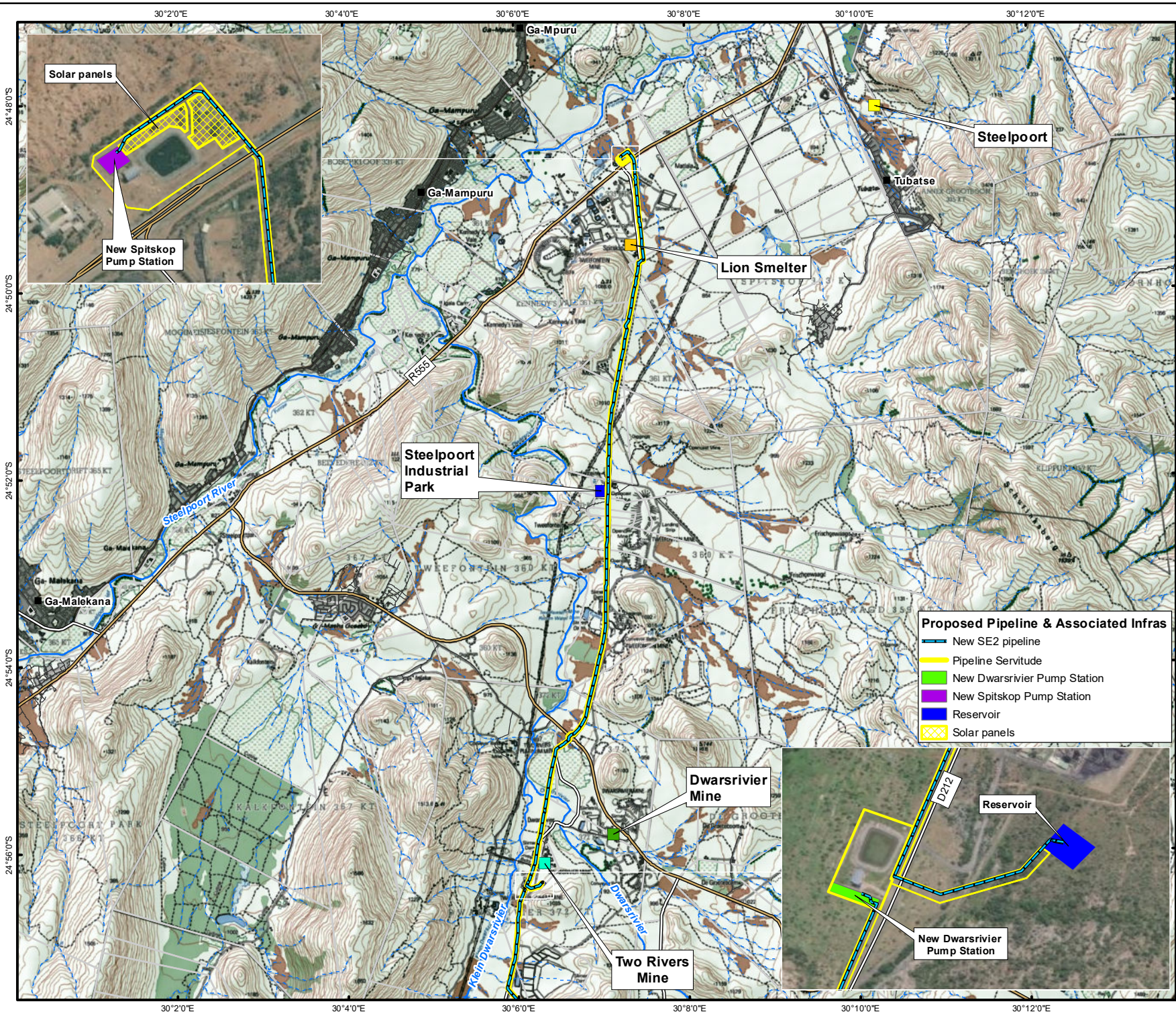
- Lion Smelter (Glencore South Africa);
- Dwarsrivier Mine (Assore);
- Two Rivers Mine (African Rainbow Minerals);
- Mototolo Mine (Anglo American Platinum); and
- Steelpoort Industrial Park (Freedom Property Fund) (potentially).

2.3 Locality

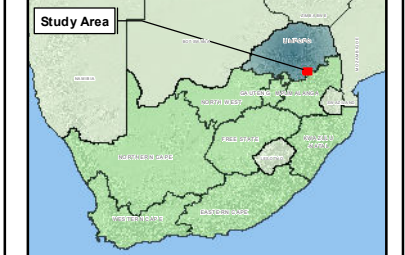
The project is located near Steelpoort in the Limpopo Province. **Table 5** outlines the details relating to the location of the project. Refer to **Figure 1** for the locality map / approved project layout.

TABLE 5: PROJECT LOCATION DETAILS

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



- ### Legend
- Dwaarsrivier 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 Dwaarsrivier Pump Station
 - New Spitskop Pump Station
 - Reservoir
 - Solar panels

SCALE: 1:100 000

0 1 2 3 4
Kilometers

N

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

CLIENT:
Lebalelo Water User Association

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

Alta van Dyk Environmental Consultants cc (2011/059764/23)
 VAT No: 4630259952
 Tel: 012 940 9457
 Fax: 086 634 3967
 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 Environmental related permits undertaken

Triggered 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 6** below.

TABLE 6: 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. 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 ² 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- ii. infrastructure or structures with a physical footprint of 10 square metres or more; where such development occurs- (a) within a watercourse;	The proposed SE2 pipeline crosses watercourses outside an urban area, within areas considered as Priority Focus Areas as per the National Protected Area Expansion Strategy and

List and activity number	Listed activity	Description of activity
	(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;	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 development.

Table 7 list the water uses that required authorisation in terms of Section 21 of the National Water Act for the development.

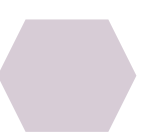
TABLE 7: LIST OF SECTION 21 WATER USES APPLIED FOR

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"> Watercourse crossing by SE2 pipeline Activities to be undertaken with a horizontal distance of 100m from the edge of the watercourse and within 500m of a delineated wetland.

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



METHODOLOGY



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 28 November 2024, to assess the level of compliance to the EMPr, environmental authorisation and conditions from SAHRA and to document the close-out 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, including:
 - Method statements:
 - Waste Control and Management (Document Nr MET-ENV-008)
 - Stormwater Management (Document Nr MET-ENV-015)
 - Storage and Use of Fuel and Hazardous Poisonous Substances (Document Nr MET-ENV-017)
 - Emergency Procedure (Document Nr MET-ENV-019)
 - Alien Plant Clearing (Document Nr MET-ENV-027)
 - Stream / River Crossing (Document Nr MET-ENV-188)
 - Clearing & Grubbing (Document Nr MET-OPS-036)
 - Excavation (Document Nr MET-OPS-038)
 - Fire Control (Document Nr MET-OPS-046)
 - Soil erosion and sediment control (Document Nr MET-OPS-075)
 - A protected trees permit Licence LP-SDM - 0004-2022-23
- Compilation of the environmental audit report.

The audit process is illustrated in **Figure 2**.

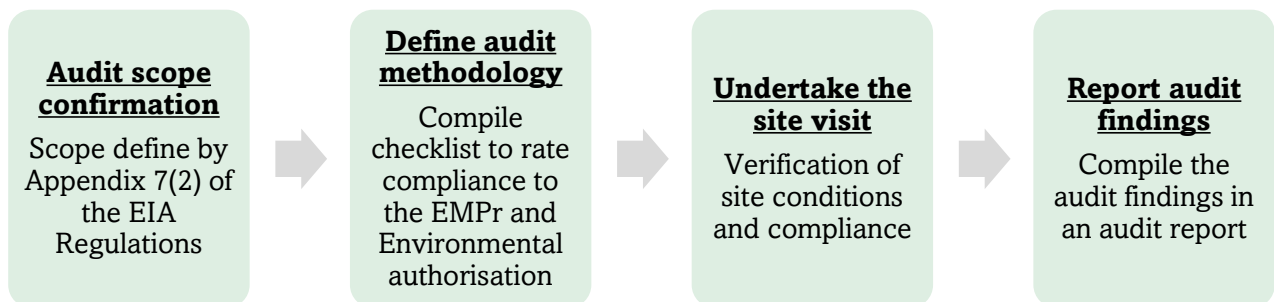


FIGURE 2: OVERVIEW OF THE AUDIT PROCESS

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.

3.3 Audit scoring system

Table 8 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 8: SCORING SYSTEM

Legend	Colour Coding
Fully Compliant	2
Partially Compliant	1
Non-Compliant	0
Not Applicable	NA

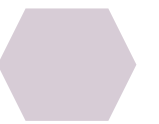
3.4 Assumptions and limitations

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.
- Should LWUA commence with Phase 2 of the project, they will undertake the following:
 - Appoint and ECO for the construction phase of Phase 2 to ensure that the mitigation / rehabilitation measures are implemented;
 - Inform the DFFE in writing of the proposed commencement of Phase 2, two weeks prior to the commencement of construction;
- Remaining excavated material along the SE2 pipeline route will be utilised in the rehabilitation of a donga area near LWUA's current Borwa Reservoir. The environmental related authorisations are currently underway;
- Recommendations in this report will be undertaken and closed out by LWUA to ensure that complete re-vegetation of disturbed areas have been undertaken.



AUDIT FINDINGS





4. AUDIT FINDINGS

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

- Table 9: Audit findings of the Environmental Authorisation;
- Table 10: Audit findings of the EMPr; and
- Table 11: Audit findings of SAHRA's conditions.

TABLE 9: AUDIT FINDINGS OF THE ENVIRONMENTAL AUTHORISATION

Audit Findings of the Environmental Authorisation				
NR	ENVIRONMENTAL AUTHORISATION CONDITION	COMPLIANCE STATEMENT	OBSERVATION IN NOVEMBER 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
SCOPE OF AUTHORISATION				
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 Lebelelo 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 of the 15km pipeline route between the Spitskop Pump Station and Dwarsrivier Pump Station Reservoir and the New Concrete Reservoir (Phase 1) were completed at the geographic co-ordinates sited within the Environmental Authorisation.	None
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. Adherence to conditions have been quantified through the undertaking of monthly environmental audits by an appointed ECO.	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. LWUA 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. 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. Environmental Training was provided to construction workers on the project. A copy of the EMPr was included within the contractor packs provided to subcontractors during the construction phase.	None
4	The activities authorised may only be carried out at the property as described above.	2	The construction of the 15km pipeline route between the Spitskop Pump Station and Dwarsrivier Pump Station Reservoir, and the new Concrete Reservoir (Phase 1) have been completed 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 (November 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 (November 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.

Audit Findings of the Environmental Authorisation

NR	ENVIRONMENTAL AUTHORISATION CONDITION	COMPLIANCE STATEMENT	OBSERVATION IN NOVEMBER 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
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 15km pipeline route between the Spitskop Pump Station and Dwarsrivier Pump Station Reservoir, and the new Concrete Reservoir (Phase 1) commenced on 24 October 2022, which is within 10 years from the date of issue of the Environmental Authorisation (28 April 2022).	LWUA to take cognisance that construction of Phase 2 of the project (pipeline between the New Reservoir and Mototolo Mine) must commence prior to 27 April 2032. If not, a new application for Environmental Authorisation must be made in order for Phase 2 to be undertaken.
8	Construction must be completed within five (05) years of the commencement of the activity on site.	2	Construction of Phase 1 commenced on 24 October 2022 and practical completion was received in mid-March 2024. On 26 April 2024, the Minister of Water and Sanitation, Mr Senzo Mchunu, commissioned the project. Construction activities were completed within five years of commencement of the activity.	Should LWUA commence construction of Phase 2 of the project, construction must be completed within five years from the date of commencement of construction.

NOTIFICATION OF AUTHORISATION AND RIGHT TO APPEAL

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. The Environmental Authorisation was granted on 28 April 2022 and the date of notification falls within the 14 calendar days. Photographic evidence can be found in Annexure B: 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 B: Photo 1.	None
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

COMMENCEMENT OF THE ACTIVITY

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. Refer to Annexure B Photo 2. Construction of Phase 1 commenced on 24 October 2022	None
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Audit Findings of the Environmental Authorisation

NR	ENVIRONMENTAL AUTHORISATION CONDITION	COMPLIANCE STATEMENT	OBSERVATION IN NOVEMBER 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
MANAGEMENT OF THE ACTIVITY				
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	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 EMPr. AVDE conducted Environmental Awareness Training with Esor Construction during the pre-construction audit on 16 September 2022. Refer to Annexure B Photo 4. This training looked at all of the EMPr conditions and how they must be implemented on site.	None
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.	None
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. No requests from the Department were received to amend the approved EMPr.	None
FREQUENCY AND PROCESS OF UPDATING THE EMPR				
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.	2	(The November 2024 found that sufficient mitigation of environmental impacts has been undertaken and an amendment of the EMPr is not required.	None
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 (November 2024) as no shortcomings have been identified in the environmental audit report.	None
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 (November 2024) as the EMPr have not been updated.	None
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 (November 2024) as the EMPr need not be updated as a result of findings in the environmental audit report.	None

Audit Findings of the Environmental Authorisation

NR	ENVIRONMENTAL AUTHORISATION CONDITION	COMPLIANCE STATEMENT	OBSERVATION IN NOVEMBER 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
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 (November 2024) as no insufficient mitigation of environmental impacts have been identified.	None
MONITORING				
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 Phase 1 of this project. Consultants from AVDE undertook monthly site visits and environmental auditing to confirm compliance to conditions stipulated in the Environmental Authorisation.	Should LWUA commence construction of Phase 2 of the project, LWU must appoint an ECO for the construction phase of Phase 2 to ensure that the mitigation / rehabilitation measures are implemented.
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 DEFE on 13 September 2022, which is prior to the commencement of construction of authorised activities. Refer to Annexure B: Photo 3.	None
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. Refer to Annexure B: 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 were documented in the monthly environmental audit reports, and provided close-out dates of recommendations.	None
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 has remained employed as the ECO for the duration of the construction phase until all construction activities have been undertaken and rehabilitation have been undertaken.	None
RECORDING AND REPORTING TO THE DEPARTMENT				

Audit Findings of the Environmental Authorisation

NR	ENVIRONMENTAL AUTHORISATION CONDITION	COMPLIANCE STATEMENT	OBSERVATION IN NOVEMBER 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
25	<p>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.</p>	2	<p>At the time of this audit (November 2024) the following documentation have been submitted to the DFFE Director: Compliance Monitoring:</p> <ul style="list-style-type: none"> * A notification letter informing the Department of the appointment of AVDE as the ECO. * The pre-construction audit report undertaken in September 2022 and submitted to the DFFE on 06 October 2022. * The first construction audit report undertaken in October 2022 and submitted to the DFFE on 03 November 2022. * The second construction audit report undertaken in November 2022 and submitted to the DFFE on 1 December 2022. * The third construction audit report undertaken in December 2022 and submitted to the DFFE on 20 December 2022. * The fourth construction audit report undertaken in January 2023 and submitted to the DFFE on 6 February 2023. * The fifth construction audit report undertaken in February 2023 and submitted to the DFFE on 6 March 2023. * The sixth construction audit report undertaken in March 2023 and submitted to the DFFE on 4 April 2023. * The seventh construction audit report undertaken in April 2023 and submitted to the DFFE on 5 May 2023. * The eighth construction audit report undertaken in May 2023 and submitted to the DFFE on 2 June 2023. * The ninth construction audit report undertaken 20 June 2023 and submitted to the DFFE on 12 July 2023. * The tenth construction audit report undertaken 18 July 2023 and submitted to the DFFE on 8 August 2023. * The eleventh construction audit report undertaken 15 August 2023 and submitted to the DFFE on 11 September 2023. * The twelfth construction audit report undertaken 19 September 2023 and submitted to the DFFE on 12 October 2023. * 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. * The fifteenth construction audit report undertaken on 6 December 2023 and submitted to the DFFE on 14 December 2023. * The sixteenth construction audit report undertaken on 16 January 2024 and submitted to the DFFE on 8 February 2024. * The seventeenth construction audit report undertaken on 20 February 2024 and submitted to the DFFE on 6 March 2024. * The eighteenth construction audit report undertaken on 19 March 2024 and submitted to the DFFE on 3 April 2024. * The nineteenth construction (pre-close out) audit report undertaken on 26 June 2024 and submitted to the DFFE on 08 July 2024. 	None

Audit Findings of the Environmental Authorisation

NR	ENVIRONMENTAL AUTHORISATION CONDITION	COMPLIANCE STATEMENT	OBSERVATION IN NOVEMBER 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
26	The frequency of auditing and of submission of the environmental audit reports must be as per the frequency indicated in the EMPr, 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 EMPr, environmental audits were undertaken monthly during construction to ensure compliance with the conditions of the Environmental Authorisation and approved EMPr. These reports were submitted to the Director: Compliance Monitoring of the DFFE.	None
27	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.	2	The Project received practical completion in early-March 2024. An environmental audit was undertaken on 19 March 2024 and the environmental audit report was submitted to the DFFE on 03 April 2024, which is within 30 days of completion of the construction phase. This audit report serves as the final audit report, to provide feedback on the rehabilitation activities that have been undertaken to date.	LWUA to ensure that the final recommendations of the ECO in this close-out audit report are undertaken and implemented.
28	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 EMPr.	2	AVDE has been appointed as the ECO on this project. This report serves as the close-out environmental audit report. All audit reports were undertaken in line with the Appendix 7 of the EIA Regulations, 2014 as amended. Refer to Table 4. The date, name of auditor and outcome for every condition is included within this audit report.	None
29	Records relating to auditing must be kept on site and made available for inspection to any relevant and competent authority in respect of this development.	NA	As the construction phase has been completed, all site offices have been removed from site. Electronic filing of the audit reports are maintained by the Esor and LWUA. 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.	None
NOTIFICATION TO AUTHORITIES				
30	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. Refer to Annexure B: Photo 3.	It is recommended that the notification letter to the DFFE be kept within the on-site compliance file.
OPERATION OF THE ACTIVITY				
31	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.	2	On the 26 March 2024, the DFFE was informed via a letter and email of the practical completion whereby the practical completion certificate was issued on 8 March 2024 and that LWUA intends to commence with the operational phase of the project. On 26 April 2024, the Minister of Water and Sanitation, Mr Senzo Mchunu, commissioned the project. The DFFE was therefore informed more than 14 days prior to the commencement of the operational phase of the activity. Refer to Annexure B: Photo 5.	
SITE CLOSURE AND DECOMMISSIONING				
32	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	The project is currently operational and is therefore not redundant.	LWUA to take cognisance that is activities cease or become redundant that the required legal actions must be followed.

Audit Findings of the Environmental Authorisation

NR	ENVIRONMENTAL AUTHORISATION CONDITION	COMPLIANCE STATEMENT	OBSERVATION IN NOVEMBER 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
SPECIFIC CONDITIONS				
33	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 (File No:27/2/2/B741/28/2), this authorisation allows for activities to take place within the watercourses. No activities, other than those authorised in terms of the General Authorisation, were undertaken.	None
34	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	Prior to commencement of construction, the pipeline was pegged. 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. 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.	None
35	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.	NA	Topsoil have been replaced in the pipeline trench along the entire constructed pipeline route. There are two stockpiles with excavated material along the pipeline route (containing rocks excavated) which could not be used to backfill the pipeline trenches, due to the weight of the rocks that might damage the pipeline. These stockpiles will be used to backfill and rehabilitate a donga area located near LWUA's Borwa Reservoir. A Basic Assessment Environmental Authorisation and Water Use Licence Application is currently underway to authorise the rehabilitation of the donga area with the two stockpiles along the SE2 pipeline route.	LWUA to obtain environmental authorisation and a Water Use Licence Application in order to use the stockpiled excavated material along the SE2 pipeline route for rehabilitation of the donga area near its Borwa Reservoir.
36	High visibility flags must be placed near any threatened / protected plants in order to avoid any damage or destruction of the species	NA	Construction has been completed and all danger tape removed from protected tree species. During the construction phase, protected trees were marked with danger tape.	None
37	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. 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.	None
38	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 (November 2024) construction has been completed. Disturbed areas have been graded and the areas allowed to naturally re-vegetate over cleared area. No exotic plants have been used for rehabilitation purposes.	LWUA to take cognisance that indigenous plants can only be used when rehabilitating the area.
39	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

Audit Findings of the Environmental Authorisation

NR	ENVIRONMENTAL AUTHORISATION CONDITION	COMPLIANCE STATEMENT	OBSERVATION IN NOVEMBER 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
40	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.	NA	Construction activities have been completed, and the clearance of vegetation around Burial site LWUA 1, Graveyard LWUA 2 and Burial site LWUA 3 is no longer required. 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. Refer to Annexure B: Photo 6.	None
41	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.</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.</p>	None

Audit Findings of the Environmental Authorisation

NR	ENVIRONMENTAL AUTHORISATION CONDITION	COMPLIANCE STATEMENT	OBSERVATION IN NOVEMBER 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
42	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.</p> <p>Photographic evidence can be found in Annexure B: 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.</p>	None
43	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.	NA	<p>All construction activities have been completed.</p> <p>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 title "Stream / River Crossings" with document number set as MET-ENV-188. This plan was implemented on site and addresses this condition.</p>	None
44	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).	2	<p>All waste has been removed from site. No litter was observed along the constructed pipeline route at the time of the audit.</p> <p>There are two stockpiles with excavated material along the pipeline route (containing rocks excavated) which could not be used to backfill the pipeline trenches, due to the weight of the rocks that might damage the pipeline. These stockpiles will be used to backfill and rehabilitate a donga area located near LWUA's Borwa Reservoir. A Basic Assessment Environmental Authorisation and Water Use Licence Application is currently underway to authorise the rehabilitation of the donga area with the two stockpiles along the SE2 pipeline route.</p>	LWUA to obtain environmental authorisation and a Water Use Licence Application in order to use the stockpiled excavated material along the SE2 pipeline route for rehabilitation of the donga area near its Borwa Reservoir.
GENERAL				
45	A copy of this Environmental Authorisation, the audit and compliance monitoring reports, and the approved EMPr, must be made available for inspection and copying -			
45.1	at the site of the authorised activity;	NA	As all construction activities have been completed and all site offices have been removed, this condition is not applicable.	None

Audit Findings of the Environmental Authorisation

NR	ENVIRONMENTAL AUTHORISATION CONDITION	COMPLIANCE STATEMENT	OBSERVATION IN NOVEMBER 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
45.2	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.
45.3	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. (https://lebalelo.co.za/project-documents/)	LWUA must upload all environmental audit reports onto its website.
46	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
Total Compliance		70		
Total Compliance Percentage		100%		

TABLE 10: 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 NOVEMBER 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
CONSTRUCTION PHASE						
SOILS						
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.	NA	Construction has been completed. Pipeline trenches have been backfilled and covered with topsoil. During the construction phase, topsoil and subsoil were stockpiled along the trench of the pipeline and backfilled in order.	None
2			The first 300 mm of topsoil must be stockpiled separate from the soil excavated deeper than 300 mm	NA	Construction has been completed. Pipeline trenches have been backfilled and covered with topsoil. During the construction phase, topsoil and subsoil were stockpiled along the trench of the pipeline and backfilled in order.	None
3			Topsoil must be stockpiled and filled back up (in the correct order).	NA	Construction has been completed. Pipeline trenches have been backfilled and covered with topsoil. During the construction phase, topsoil and subsoil were stockpiled along the trench of the pipeline and backfilled in order.	None
4			All removed topsoil stockpiles must be protected from erosion, stored on flat areas where run-off will be minimised, and be surrounded by bunds.	NA	Construction has been completed. Pipeline trenches have been backfilled and covered with topsoil. During the construction phase, topsoil was stored mainly on flat areas. Sandbags were used to protect topsoil from erosion around drainage lines. There are two stockpiles with excavated material along the pipeline route (containing rocks excavated) which could not be used to backfill the pipeline trenches, due to the weight of the rocks that might damage the pipeline. These stockpiles will be used to backfill and rehabilitate a donga area located near LWUA's Borwa Reservoir. A Basic Assessment Environmental Authorisation and Water Use Licence Application is currently underway to authorise the rehabilitation of the donga area with the two stockpiles along the SE2 pipeline route.	LWUA to obtain environmental authorisation and a Water Use Licence Application in order to use the stockpiled excavated material along the SE2 pipeline route for rehabilitation of the donga area near its Borwa Reservoir.
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	Topsoil have been replaced in the pipeline trench along the entire constructed pipeline route. There are two stockpiles with excavated material along the pipeline route (containing rocks excavated) which could not be used to backfill the pipeline trenches, due to the weight of the rocks that might damage the pipeline. These stockpiles will be used to backfill and rehabilitate a donga area located near LWUA's Borwa Reservoir. A Basic Assessment Environmental Authorisation and Water Use Licence Application is currently underway to authorise the rehabilitation of the donga area with the two stockpiles along the SE2 pipeline route.	LWUA to obtain environmental authorisation and a Water Use Licence Application in order to use the stockpiled excavated material along the SE2 pipeline route for rehabilitation of the donga area near its Borwa Reservoir.
6			Ensure topsoil stockpiles and concrete / building sand are sufficiently safeguarded against rain wash.	NA	Construction has been completed. Topsoil have been backfilled into the pipeline trenches. There are no building sand stockpiles on the site.	None

Audit Findings of the EMPr								
NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN NOVEMBER 2024 AUDIT	RECOMMENDATIONS BY AUDITOR		
7	Trench excavation and installation of pipeline Construction of reservoir	Contamination of soils due to spilled concrete or hydrocarbons - Conservation of soils a resource	These designated stockpile areas must be viewed as temporary and kept for backfill material.	2	Topsoil have been replaced in the pipeline trench along the entire constructed pipeline route. There are two stockpiles with excavated material along the pipeline route (containing rocks excavated) which could not be used to backfill the pipeline trenches, due to the weight of the rocks that might damage the pipeline. These stockpiles will be used to backfill and rehabilitate a donga area located near LWUA's Borwa Reservoir. A Basic Assessment Environmental Authorisation and Water Use Licence Application is currently underway to authorise the rehabilitation of the donga area with the two stockpiles along the SE2 pipeline route.	LWUA to obtain environmental authorisation and a Water Use Licence Application in order to use the stockpiled excavated material along the SE2 pipeline route for rehabilitation of the donga area near its Borwa Reservoir.		
8			Maintain topsoil quality and minimise damage to the soil structure during the time the material is stockpiled.	NA	Construction has been completed. Topsoil have been backfilled into the pipeline trenches. During the construction phase, no vehicles were allowed to drive on topsoil stockpiles, thereby minimising damage to soil structure.	None		
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 was undertaken using existing roads. No new roads were identified at the time of this audit (November 2024).	None		
10			Compacted areas are to be ripped to loosen the soil structure where necessary.	1	During this audit (November 2024), it was noticed that some areas along the pipeline route have not been ripped to loosen the soil structure to allow for natural re-vegetation.	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.	NA	Construction has been completed. There are no construction or laydown areas at the site. During the construction phase, sand bags were placed between construction areas and drainage lines to ensure that runoff from construction areas are diverted around drainage lines.	None		
12			Concurrent rehabilitation must be carried out rather than full rehabilitation after construction.	2	Concurrent rehabilitation was undertaken. As the pipeline route were constructed, the area was backfilled with excavated material, topsoil placed and the area allowed for natural re-vegetation.	None		
13			Ensure topsoil is spread back over trench area on closure of the trench.	2	After the pipeline trenches were backfilled with excavated material, topsoil was spread back over the trench area and the area allowed for natural re-vegetation.	None		
14			Landscape and lightly till (no deeper than 30 cm) denuded areas to encourage vegetation establishment as soon as possible.	1	During this audit (November 2024), it was noticed that some areas along the pipeline route and at the New Reservoir have not re-vegetated completely, and bare soil is still visible. Refer to Photo 7 and 8.	LWUA to ensure that all areas along the pipeline route and at the New Reservoir has been rehabilitated and completely re-vegetated. Inspections must be undertaken on a monthly basis until re-vegetation has been established completely.		
15			Trench excavation and installation of pipeline	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.	NA	Construction has been completed, there was no machinery or equipment on site.	
16			Construction of reservoir	Conservation of soils a resource	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.	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.	None

Audit Findings of the EMPr						
NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN NOVEMBER 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
17			The Contractor shall be in possession of an emergency spill kit that must always be complete and available on site.	NA	As no construction activities are taking place at the moment, no spill kit on site is required. During the construction phase, spill kits were available on site.	None
18			Any fuel, oil or hazardous substance spills must be cleaned-up immediately and discarded correctly.	NA	All construction activities have been completed on site. At the time of this audit (November 2024), there were no vehicles or machines on site. No hydrocarbon spills were observed on site.	None
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.	NA	Construction has been completed, there was no machinery or equipment on site.	None
BIODIVERSITY: FAUNA AND FLORA						
20	Vegetation clearing and site preparation	Destruction, fragmentation and degradation of habitats - Limit the disturbance and destruction of vegetation, fauna and habitat	Demarcate the footprint area with high visibility plastic fencing.	NA	Construction has been completed and therefore the demarcation of the footprint area is no longer required. During the construction phase, the construction area was demarcated with high-visibility mesh fencing.	None
21			Restrict the disturbance footprint to within the designated pipeline route.	NA	Construction has been completed. Re-vegetation of disturbed areas has been undertaken on most areas.	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. No new roads were identified at the time of this audit (November 2024).	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.	NA	Construction has been completed. There were no laydown areas or chemical toilets on site.	
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	1	During this audit (November 2024), it was noticed that some areas along the pipeline route and at the New Reservoir have not re-vegetated completely, and bare soil is still visible. Refer to Photo 7 and 8.	LWUA to ensure that all areas along the pipeline route and at the New Reservoir has been rehabilitated and completely re-vegetated. Inspections must be undertaken on a monthly basis until re-vegetation has been established completely.
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	1	During this audit (November 2024), it was noticed that some areas along the pipeline route and at the New Reservoir have not re-vegetated completely, and bare soil is still visible. Refer to Photo 7 and 8.	LWUA to ensure that all areas along the pipeline route and at the New Reservoir has been rehabilitated and completely re-vegetated. Inspections must be undertaken on a monthly basis until re-vegetation has been established completely.		

Audit Findings of the EMPr

NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN NOVEMBER 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
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 maintained, and all re-fuelling and servicing of equipment is to take place in demarcated areas outside of the project area.	2	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. At the time of the audit (November 2024) construction activities have been completed and no machinery or vehicles were on site.	None
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.	NA	Construction activities have been completed. No construction workers were on site at the time of the audit. During the construction phase, no observations of the removal of indigenous plant species, or the bringing in of any plant species (indigenous or exotic) were made.	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"> · Adherence to the daily fire danger ratings · Must have equipment, protective clothing and trained personnel for extinguishing fires · No lighting, using or maintain a fire in the open air unless in the designated place · Contractors must do everything in their power to stop the spread of veld fires during the installation of water pipes. 	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 November 2024, no remnants of fires were noted.	None
29			Reduce the disturbance footprint and the unnecessary clearing of vegetation on either side of the trench as far as possible.	NA	Construction activities have been completed. No additional clearance of vegetation was noticed at the time of the audit. Approval was granted for the clearance of a corridor area of 25m (inclusive of the servitude). During the construction phase, a corridor of approximately 17m corridor were cleared for construction of the pipeline. At the wetland area, vegetation clearance should have been limited to the servitude (15m). Clearance in the wetland area was up to 30m.	None

Audit Findings of the EMPr

NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN NOVEMBER 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
30		Loss of protected plant and tree species - Limit the disturbance and destruction of vegetation, fauna and habitat	<p>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.</p> <ul style="list-style-type: none"> 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	<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.</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>	None
31			<p>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 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.</p>	2	<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.</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>	None
32			<p>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.</p>	2	<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.</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>As all construction activities have been completed, all danger tape have been removed from protected trees.</p>	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	Vegetation clearing and site preparation	Spread and/or establishment of alien and/or invasive species	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.	1	During this audit (November 2024), it was noticed that some areas along the pipeline route and at the New Reservoir have not re-vegetated completely, and bare soil is still visible. Refer to Photo 7 and 8.	LWUA to ensure that all areas along the pipeline route and at the New Reservoir has been rehabilitated and completely re-vegetated. Inspections must be undertaken on a monthly basis until re-vegetation has been established completely.
34	Trench excavation and installation of pipeline Construction of reservoir	Minimise and prevent the spread of alien and/or invasive species	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.	NA	<p>Construction activities have been completed. No additional clearance of vegetation was noticed at the time of the audit.</p> <p>Approval was granted for the clearance of a corridor area of 25m (inclusive of the servitude). During the construction phase, a corridor of approximately 17m corridor were cleared for construction of the pipeline.</p>	None

Audit Findings of the EMPr						
NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN NOVEMBER 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
					At the wetland area, vegetation clearance should have been limited to the servitude (15m). Clearance in the wetland area was up to 30m.	
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	2	All waste has been removed from site. No litter was observed along the constructed pipeline route at the time of the audit.	None
36			Compilation of and implementation of an alien vegetation management plan.	2	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 November 2024, no alien invasive species were noticed along the pipeline route or at the New Reservoir.	LWUA to continue to monitor the pipeline route on a monthly basis to remove alien invasive species until natural re-vegetation has been established.
37			A pest control plan must be put in place and implemented; it is imperative that poisons not be used. Opt for manual removal.	NA	All construction activities have been completed. It is unlikely that pests such as rodents will be on site as all waste has been removed from site.	None
38			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	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 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.	None
39	Vegetation clearing and site preparation	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	The areas to be developed must be specifically demarcated to prevent movement of staff or any individual into the surrounding environments, - Signs must be put up to enforce this	NA	All construction activities have been completed. There are no construction workers on site any longer.	None
40	Trench excavation and installation of pipeline - Construction of reservoir, solar panels, and new pump stations		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. 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 March 2024.	None
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	NA	Construction activities have been completed. There are no construction activities taking place on site any longer which creates noise disturbance.	None
42			No trapping, killing, or poisoning of any wildlife is to be allowed.	NA	All construction activities have been completed. There are no construction workers on site any longer.	None
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.	NA	All construction activities have been completed. The pipeline trenches have been backfilled and closed.	None

Audit Findings of the EMPr						
NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN NOVEMBER 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
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	NA	All construction activities have been completed. There are no construction workers on site any longer.	None
45	Vegetation clearing and site preparation Trench excavation and installation of pipeline Construction of reservoir	Introduction of nuisance vectors (pests) such as flies, rodents and baboons - Limit the disturbance and destruction of vegetation, fauna and habitat	Ensure the correct handling, storage and operation of general waste generated on the construction site.	NA	Construction have been completed. All waste have been removed from site.	None
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	NA	Construction activities have been completed. There are no construction workers on site, and therefore chemical toilets are not required.	None
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.	NA	Construction have been completed. All waste have been removed from site.	None
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.	NA	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.	None
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.	NA	Construction have been completed. All waste have been removed from site.	None
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.	NA	Construction have been completed. All waste have been removed from site.	None
SURFACE WATER AND WETLANDS						
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.	NA	Construction has been completed. No construction activities are taking place on site.	None
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.	NA	Construction has been completed. No construction activities are taking place on site.	None
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.	NA	Construction has been completed. No construction activities are taking place on site. During the construction phase, there were no laydown areas, storage areas, or cement mixing taking place within the wetland buffer zones.	None
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.	NA	Construction has been completed. No construction activities are taking place on site.	None
55			Demarcate the 15 m buffer zone around wetlands on the ground (e.g. painted wooden poles/high visibility plastic fencing).	NA	Construction has been completed. No construction activities are taking place on site.	None

Audit Findings of the EMPr						
NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN NOVEMBER 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
56			Reduce the disturbance footprint and the unnecessary clearing of vegetation on either side of the trench as far as possible when traversing wetlands.	NA	Construction has been completed. No construction activities are taking place on site.	None
57			Consider above ground crossings over wetland areas. Alternatively, open trench crossings are permissible but backfilling and rehabilitation must be undertaken.	1	Construction has been completed and the pipeline trenches backfilled with excavated material. Re-vegetation of disturbed areas at the wetland area have taken place, but there are still some areas that have not naturally re-vegetated. Refer to Annexure B: Photo 9	LWUA to ensure that all areas along the pipeline route and at the New Reservoir has been rehabilitated and completely re-vegetated. Inspections must be undertaken on a monthly basis until re-vegetation has been established completely.
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.	NA	Construction has been completed. No construction activities are taking place on site.	None
59			All chemicals and toxicants to be used for the construction must be stored in a bunded area	NA	Construction has been completed. No construction activities are taking place on site. There are no chemicals on site.	None
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.	NA	Construction has been completed. No construction activities are taking place on site.	None
61			Vegetation clearing and site preparation	Increased bare surfaces, runoff and potential for erosion and resulting sedimentation of the wetlands - Minimise the potential for surface water pollution Limit the disturbance and destruction of delineated wetlands	Keep the trench excavation neat and tidy.	NA
62	Separate sub-soil and topsoil on either side of the trench.	NA			Construction has been completed. Excavated material have been backfilled into the pipeline trench and re-vegetation has commenced.	None
63	Limit construction activities across the wetlands to the dry season, if possible, when storms are least likely to wash concrete and sand into wetlands.	NA			Construction has been completed. No construction activities are taking place on site.	None
64	Ensure soil stockpiles and concrete / building sand are sufficiently safeguarded against rain wash.	NA			Construction has been completed. No construction activities are taking place on site. Excavated material within the wetland areas have been backfilled into the pipeline trenches and revegetation commenced.	None
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.	NA			Construction has been completed. No construction activities are taking place on site. No mixing of concrete was undertaken on site.	None
66	Do not situate any of the construction material laydown areas within any wetland or buffer areas.	NA			Construction has been completed. No construction activities are taking place on site. All construction material have been removed from site.	None
67	No machinery/equipment should be allowed to be parked in any wetlands or buffer zone areas	NA			Construction has been completed. No construction activities are taking place on site. No machinery was on site at the time of the audit.	None

Audit Findings of the EMPr						
NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN NOVEMBER 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
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.	NA	Construction has been completed. No construction activities are taking place on site. Excavated material within the wetland areas have been backfilled into the pipeline trenches and revegetation commenced.	None
69			Speed limits must be put in place to reduce erosion. <ul style="list-style-type: none"> 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. 	NA	Construction has been completed. No construction activities are taking place on site. There were no construction vehicles on site.	None
70			Where possible, existing access routes and walking paths must be made use of.	NA	Construction has been completed. No construction activities are taking place on site. Existing access roads are used for access to site.	None
71			Areas that are denuded during construction need to be re-vegetated with indigenous vegetation to prevent erosion during flood events and strong winds.	1	At the time of this audit, it was found that natural vegetation was left to re-establish. There were areas observed with no vegetation growth. These areas should be re-vegetated. Photographic evidence can be found in Annexure B: Photo 7-9	LWUA to ensure that all areas along the pipeline route and at the New Reservoir has been rehabilitated and completely re-vegetated. Inspections must be undertaken on a monthly basis until re-vegetation has been established completely.
72			A stormwater management plan must be compiled and implemented during construction activities.	NA	Construction has been completed. No construction activities are taking place on site.	None
73			Landscape and lightly till (no deeper than 30 cm) denuded areas to encourage vegetation establishment as soon as possible.	1	At the time of this audit, it was found that natural vegetation was left to re-establish. There were areas observed with no vegetation growth. These areas should be re-vegetated. Photographic evidence can be found in Annexure B: Photo 7-9.	LWUA to ensure that all areas along the pipeline route and at the New Reservoir has been rehabilitated and completely re-vegetated. Inspections must be undertaken on a monthly basis until re-vegetation has been established completely.
74			Vegetation clearing and site preparation	<p>Degradation of wetland vegetation and the introduction and spread of alien and invasive vegetation</p> <p>Minimise the potential for surface water pollution</p> <p>Limit the disturbance and destruction of delineated wetlands</p>	Promptly remove all alien and invasive plant species that may emerge during construction (i.e. weedy annuals and other alien forbs) must be removed.	2
75	The use of herbicides is not recommended in or near wetlands (opt for mechanical removal).	2			LWUA confirmed that mechanical removal of alien invasive plants are utilised.	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.	NA			Construction has been completed. Topsoil have been backfilled into the pipeline trenches.	None
77	Clearly demarcate construction footprint, and limit all activities to within this area.	NA			Construction has been completed and therefore the demarcation of the footprint area is no longer required.	None
78	Minimize unnecessary clearing of vegetation.	NA			Construction has been completed. No additional vegetation clearing was observed during the November 2024 site visit.	None

Audit Findings of the EMPr

NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN NOVEMBER 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
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 need to avoid littering, the reporting and cleaning of spills and leaks and general good "housekeeping".	NA	Construction has been completed. There are no contractors or employees on site. As there are no persons on site, induction is not required.	None
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).	NA	Construction has been completed. There are no contractors or employees on site. Ablution facilities are not required on site.	None
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.	NA	Construction has been completed. No construction material was observed within the wetland or wetland buffer area.	None
82			All waste generated on site during construction must be adequately managed. Separation and recycling of different waste materials should be supported.	NA	All waste has been removed from site. No litter was observed along the constructed pipeline route at the time of the audit.	None
83			Landscape and re-vegetate all denuded areas as soon as possible.	1	At the time of this audit, it was found that natural vegetation was left to re-establish. There were areas observed with no vegetation growth. These areas should be re-vegetated. Photographic evidence can be found in Annexure B: Photo 7-9	LWUA to ensure that all areas along the pipeline route and at the New Reservoir has been rehabilitated and completely re-vegetated. Inspections must be undertaken on a monthly basis until re-vegetation has been established completely.
84	Vegetation clearing and site preparation Trench excavation and installation of pipeline	Increased sediment loads to downstream reaches - Minimise the potential for surface water pollution Limit the disturbance and destruction of delineated wetlands	Implement mitigation for increased bare surfaces, runoff and potential for erosion.	1	At the time of this audit, it was found that natural vegetation was left to re-establish. There were areas observed with no vegetation growth. These areas should be re-vegetated. Photographic evidence can be found in Annexure B: Photo 7-9	LWUA to ensure that all areas along the pipeline route and at the New Reservoir has been rehabilitated and completely re-vegetated. Inspections must be undertaken on a monthly basis until re-vegetation has been established completely.
85			Re-instate topsoil and lightly till disturbance footprint.	2	Topsoil have been replaced on backfilled pipeline trenches.	None
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.	1	At the time of this audit, it was found that natural vegetation was left to re-establish. There were areas observed with no vegetation growth. These areas should be re-vegetated. Photographic evidence can be found in Annexure B: Photo 7-9.	LWUA to ensure that all areas along the pipeline route and at the New Reservoir has been rehabilitated and completely re-vegetated. Inspections must be undertaken on a monthly basis until re-vegetation has been established completely.
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	Make sure all excess consumables and building materials / rubble is removed from site and deposited at an appropriate waste facility.	NA	All waste has been removed from site. No litter was observed along the constructed pipeline route at the time of the audit.	None
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.	NA	Construction has been completed. There were no construction vehicles or machinery on site at the time of the November 2024 audit. No hydrocarbon spills were observed on site.	None

Audit Findings of the EMPr						
NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN NOVEMBER 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
89		surface water pollution	Mixing of concrete must under no circumstances take place within the wetland or buffer areas.	NA	Construction has been completed. No mixing of cement was observed at the time of the November 2024 audit.	None
90		Limit the disturbance and destruction of delineated wetlands	Regularly check 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.	NA	Construction has been completed. There were no construction vehicles or machinery on site at the time of the November 2024 audit.	None
91			Provide appropriate sanitation facilities during construction and service them regularly. These must be beyond the wetland and buffer area.	NA	Construction has been completed. There are no contractors or employees on site. Ablution facilities are not required on site.	None
92			Monitor and inspect machinery, vehicles and equipment for leaks and spills.	NA	Construction has been completed. There were no construction vehicles or machinery on site at the time of the November 2024 audit.	None
93	Backfilling of trench	Disruption of wetland soil profile and alteration of hydrological regime	. Separate the topsoil (including seedbank) from the subsoil layer.	NA	Construction has been completed. Pipeline trenches have been backfilled and covered with topsoil.	None
94			Ensure that topsoil is appropriately stored and re-applied during trench backfilling.	NA	Construction has been completed. Pipeline trenches have been backfilled and covered with topsoil.	None
95		Minimise the potential for surface water pollution Limit the disturbance and destruction of delineated wetlands	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.	NA	Construction has been completed. Pipeline trenches have been backfilled and covered with topsoil.	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.
HERITAGE						
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 activities have been completed along LWUA 1, 2 and 3. These areas have not been impacted upon by the construction activities.	None
97			The graves and cemeteries must be accessible at all times during construction.	2	It was confirmed during this audit undertaken in November 2024 that the graves and graveyard are still accessible to families.	None
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	Construction activities have been completed, and the clearance of vegetation around Burial site LWUA 1, Graveyard LWUA 2 and Burial site LWUA 3 is no longer required. 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. Refer to Annexure B: Photo 6.	None
99			Implement dust suppression around graves and cemeteries to minimise dust fallout on headstones.	NA	Construction has been completed and there are no activities taking place that could create dust fallout.	None

Audit Findings of the EMPr

NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN NOVEMBER 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
100			Implement the chance find procedure should an artefact or grave be uncovered during construction.	2	<p>A chance find procedure has been implemented on site.</p> <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.</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.</p>	None
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	<p>A chance find procedure has been implemented on site.</p> <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.</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.</p>	LWUA to take cognisance that a the chance find procedure should be implemented if an artefact or grave be uncovered during construction.
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

NOISE

Audit Findings of the EMPr						
NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN NOVEMBER 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
104	Site clearing and preparation	General rise in ambient noise levels - Minimise the generation of noise	Ensure high level of equipment maintenance, especially intake and exhaust mufflers.	NA	Construction activities have been completed. There are no construction activities taking place on site any longer which creates noise disturbance.	None
105	Trench excavation and installation of pipeline		Replace pure tone (beeping) with broadband (hissing) reversing alarms.	NA	Construction activities have been completed. There are no construction activities taking place on site any longer which creates noise disturbance.	None
106	Construction of reservoir		Construction activities to take place only during daylight hours.	NA	Construction activities have been completed. There are no construction activities taking place on site any longer which creates noise disturbance.	None
AIR QUALITY						
107	Site clearing and preparation	Increased dust fallout around construction areas - Minimise atmospheric emissions and dust generation	Apply dust suppressants to gravel roads used.	NA	Construction activities have been completed. There are no activities on site that creates dust fallout.	None
108	Trench excavation and installation of pipeline		Set speed limits to 40 km/h to minimise the creation of fugitive dust within the project boundary.	NA	Construction activities have been completed. There are no activities on site that creates dust fallout.	None
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.	NA	Construction activities have been completed. There are no activities on site that creates dust fallout.	None
SOCIAL						
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	NA	Construction has been completed. There are no longer employment opportunities.	None
111			Employ local works if qualified applicants with the appropriate skills are available.	NA	Construction has been completed. There are no longer employment opportunities.	None
112			Purchase goods and services at a local level if available.	NA	Construction has been completed. Goods and services are no longer required.	None
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	Develop a clear and concise employment and recruitment policy that prioritizes local recruitment. Ensure that contractors adhere to this policy.	NA	Construction has been completed. There are no longer employment opportunities.	None
114			Identify and support community development programmes that address challenges raised by population influx and spontaneous settlement.	NA	Construction has been completed. There are no longer employment opportunities.	None

Audit Findings of the EMPr						
NR	ACTIVITY THAT MAY CAUSE AN IMPACT	MANAGEMENT OUTCOME	EMP COMMITMENT	COMPLIANCE STATUS	OBSERVATION IN NOVEMBER 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
115		opportunities and social benefits	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.	NA	Construction has been completed. There are no longer employment opportunities.	None
117			Through the stakeholder engagement process ensure that expectations are managed around employment opportunities and practices.	NA	Construction has been completed. There are no longer employment opportunities.	None
118	Construction of SE2 pipeline and reservoir	Dissatisfaction over employment opportunities and conditions of procurement which could potentially lead to community protests and unrests, as well as conflicts within communities - 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.	NA	Construction has been completed. There are no longer employment opportunities.	None
119			Through the stakeholder engagement process ensure that expectations are managed around employment opportunities and practices.	NA	Construction has been completed. There are no longer employment opportunities.	None
120			Monitor and implement the Grievance Management Mechanism.	NA	Construction has been completed, therefore there should be no complaints.	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.	LWUA to take cognisance that the site must involve Local Ward Councillors and keep them informed about project developments.
Total Compliance Score				63		
Total Compliance Percentage				85%		



TABLE 11: AUDIT FINDINGS OF SAHRA'S CONDITIONS

Audit Findings of the SAHRA's Conditions				
NR	LICENCE CONDITION	COMPLIANCE STATUS	OBSERVATION IN NOVEMBER 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
FINAL COMMENTS				
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	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	Construction activities have been completed, and the clearance of vegetation around Burial site LWUA 1, Graveyard LWUA 2 and Burial site LWUA 3 is no longer required. 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. Refer to Annexure B: Photo 6.	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	<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 laded SP 12, this grave was 22 meters from the pipeline excavations and no impacts were noted in the report.</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.</p>	None



Audit Findings of the SAHRA's Conditions

NR	LICENCE CONDITION	COMPLIANCE STATUS	OBSERVATION IN NOVEMBER 2024 AUDIT	RECOMMENDATIONS BY AUDITOR
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	<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.</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.</p>	None
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.	None
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.</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.</p>	It is recommended that a heritage consultant is appointed to undertake the required studies and reburial of the human remains.
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
Total Compliance Score		20		
Total Compliance Percentage		100%		



CONCLUSION AND RECOMENDATIONS

5. CONCLUSION AND RECOMMENDATIONS

An overall compliance rating of 95% has been achieved for the November 2024 audit, which also serves as the close-out audit for the project. Conditions and commitments from three documents were considered, namely the environmental authorisation, approved EMPr and final comments from SAHRA. Refer to **Table 12**.

TABLE 12: PERCENTAGE COMPLIANCE

Document	% Compliance
Environmental authorisation	100%
EMPr	85%
SAHRA	100%
Total % Compliance	95%
Document	% Compliance

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.



ANNEXURES



ANNEXURES A: ATTENDANCE REGISTER

Postnet Suite #745
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Lyttelton,
1040
Cell: 076 314 3604
Fax: 086 634 3967
teata@avde.co.za



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

Project Management, Peer Review, Advisory, Education

Lebalelo Water User Association
SE2 Raw Water Pipeline and associated infrastructure: Environmental Audit Site Visit
28 November 2024 – Close out environmental audit

FULL NAME	ORGANISATION	TELEPHONE	CELL NO	E-MAIL	SIGNATURE
Carl Taboach	LWUA	0824622578		carel@lebalelo.co.za	<i>[Signature]</i>
Peet Hartman	Indaburo	0827735842		hartman3006@gmail.com	<i>[Signature]</i>
Retha Kemp	ESOR	07330091031		ratha@esor.co.za	<i>[Signature]</i>
Tshaya Hlungu	AUDF	0799087587		tshaya@avde.co.za	<i>[Signature]</i>
Suzanne Louw	AVOC	0781966002		suzanne@avde.co.za	<i>[Signature]</i>

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Company Registration Number: 2023/985194/07

ANNEXURE B: 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

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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Cell: 078 196 6002 0140
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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

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

Telephone Number: (012) 348 4654
E-mail: 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: 'mlchauke@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
	'mlchauke@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
 Pri.Sci.Nat (400378/11)
 Registered EAP (EAPASA Ref 2019/1079)



Alta van Dyk Environmental Consultants cc (2011/059764/23)
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Photo 4: Attendance Register for Environmental Training – AVDE

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



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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 GUYAN	ESOR	0825544310	0825544310	charlesg@esor.co.za	<i>[Signature]</i>
Etene Clarke	"	07944936309		etene@avde.co.za	<i>[Signature]</i>
Macdonald Sedimo	ESOR	073906142		johank@esor.co.za	<i>[Signature]</i>
Johann Klopper	ESOR	0848442226		johank@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>

Company Registration Number: 2011/059764/23

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Photo 5: Proof of notification of the DFFE of commencement of the operational phase of the project

Suzanne van Rooy

From: Suzanne van Rooy <suzanne@avde.co.za>
Sent: Tuesday, 26 March 2024 14:33
To: 'directorcompliance@dffe.gov.za'
Cc: 'Carel Taljaard'; 'hartman3006@gmail.com'; 'maris'; 'kirthi@avde.co.za'; 'Lenaldi Gorgens'; 'tyla@avde.co.za'; 'reata@avde.co.za'
Subject: Notification of commencement of operations: DFFE Ref. 14/12/16/3/3/1/2442
Attachments: 240326_Notification of commencement of Ops_Final.pdf

Good afternoon,

Attached please find a notification letter for Lebalelo Water User Association's proposed commencement of operation of its SE2 pipeline.

Kind regards,

Suzanne van Rooy

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



**Alta van Dyk
Corporate Group**
Oxidane • Environmental • Environmental Toxicology

Alta van Dyk Corporate Group

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

Photo 6: Graveyard at LWUA 1 with knocked over headstone



Photo 7: Areas along pipeline route that has not re-vegetated



Photo 8: Area at New Reservoir that has not re-vegetated



Photo 9: Area at wetland have not been completed re-vegetated

