



# **DRAFT Environmental Audit Report**

for

## **Gondwana Game Reserve**

.

In terms of the  
National Environmental Management Act (Act No. 107 of 1998, as  
amended) & 2014 Environmental Impact Regulations

**Prepared for Applicant:** Gondwana Game Reserve (Pty) Ltd

**Date:** 12 November 2018

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**Report Reference:** MOS022b/16

**EA Reference:** G12/2/1/261/6225/V3

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PURPOSE OF THIS REPORT:

Environmental Audit Report

APPLICANT:

Gondwana Game Reserve (Pty) Ltd

CAPE EAPRAC REFERENCE NO:

MOS022b/16

DEPARTMENT REFERENCE:

EA Reference: G12/2/1/261/6225/V3

SUBMISSION DATE

12 November 2018

# DRAFT ENVIRONMENTAL AUDIT REPORT

in terms of the

National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended & Environmental Impact Regulations 2014

## Gondwana Game Reserve

Submitted for:

### Departmental Review

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## CONTENT OF AN ENVIRONMENTAL AUDIT REPORT

Appendix 7 of Regulation 982 of the 2014 EIA Regulations contains the required contents of an Environmental Audit Report. The checklist below serves as a summary of how these requirements were incorporated into this Audit Report.

Requirement	Description
(1) An Environmental audit report prepared in terms of these Regulations must contain -	
(a) Details of – (i) The independent person who prepared the environmental audit report; and (ii) The expertise of independent person that compiled the environmental audit report.	<p>The report has been prepared by Siân Holder of Cape Environmental Assessment Practitioners (<i>Cape EAPrac</i>).</p> <p>Mr Holder has a ND Nature Conservation and has fifteen years' experience as an environmental practitioner.</p> <p>The EAP CV and Company Profile is included as Appendix E of this report.</p>
(b) A declaration that the independent auditor is independent in a form as may be specified by the competent authority.	A Declaration of Independence is included as Section 12 of this report.
(c) An indication of the scope of, and the purpose for which, the environmental audit report was prepared.	See Section 1
(d) A description of the methodology adopted in preparing the environmental audit report.	The report is based on evaluation of the activities on site in relation to the review of historical aerial photos, the Environmental Authorisation (EA), Environmental Management Programme (EMPr), and verified via a site inspection. Details of the information considered in the preparation of this report are contained in section 3.1
(e) An indication of the ability of the EMPr, and where applicable the closure plan to – (i) Sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis; (ii) Sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the closure of the facility; and (iii) Ensure compliance with the provisions of environmental authorisation, EMPr, and where applicable, the closure plan.	The activities to date have demonstrated adequate measures to avoid impacts within the scope of the development. Please refer to section 5
(f) A description of any assumptions made, and any uncertainties or gaps in knowledge.	Refer to Section 4
(g) A description of any consultation process that was undertaken during the course of carrying out the environmental audit report.	<p>Preliminary consultation was undertaken with the Department of Environmental Affairs, Gondwana Reserve Management as well as an adjacent landowner, Mr Hennie Claassen. This Draft Audit Report will be circulated to the following parties for review and comment:</p> <ul style="list-style-type: none"> <li>- DEA&amp;DP;</li> <li>- Cape Nature;</li> <li>- Department of Transport and Public Works;</li> </ul>

	<ul style="list-style-type: none"><li>- Department of Agriculture;</li><li>- Mossel Bay Municipality;</li><li>- DWS and Breede Gourits Catchment Management Agency</li></ul> <p>The Final Audit report will include consideration of comment received from these parties.</p>
(h) A summary and copies of any comments that were received during any consultation process.	These will be provided after the consultation period referred to above.
(i) Any other information requested by the competent authority.	Any additional information requested by the competent authority will be provided after the consultation process.

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## 1. INTRODUCTION

**The findings of this draft audit show an overall high level of compliance on both the primary and secondary compliance aspects associated with the development. Due to the extended time period (12 Years) between the Authorisation of this development and this first audit, there are uncertainties and gaps of knowledge in the information available to effectively audit compliance. This draft audit is therefore submitted with a moderate - high level of confidence. In order to improve the level of confidence of this draft audit, comments on this draft audit report will be obtained from DEA&DP, Department of Transport and Public Works, Cape Nature, Department of Agriculture and the Mossel Bay Municipality.**

**Cape Environmental Assessment Practitioners (Cape EAPrac)** has been appointed by Gondwana Game Reserve (Pty) Ltd, to compile an Environmental Audit Report in terms of their Environmental Authorisation (and amendments thereto) as well the Environmental Management Programme. Copies of these documents are included as Appendix A, B and C respectively.

Gondwana Game Reserve, is a private conservation initiative situated near Herbertsdale in the the Mossel Bay Municipal area. It consists of Private Open Space, 3 x Resort Zone I erven and 96 Resort Zone II erven.

## 2. AUDIT REQUIREMENTS

It should be noted that this audit is undertaken in terms of Regulation 326, as amended on 7 April 2017 (2014 Environmental Regulations) and conditions 28 of the EA (Appendix A).

For the purpose of this audit the focus remains on Construction and operational actions. Since the facility has no intention of decommissioning in the near future, this audit excludes aspects associated with a closure plan or decommissioning.

Section 34(1) of the Regulations states that the Holder of an EA must, for the period during which the EA and EMPr remains valid:

- a) Ensure that the compliance with the conditions of the EA and EMPr, is audited; and
- b) Submit and environmental audit report to the relevant competent authority.

Section 32(2) details the contents of an audit:

- a) The audit report must be prepared by an independent person with the relevant environmental auditing expertise;
- b) Provide verifiable findings on:
  - a. The level of performance against and compliance of the project with the provisions of the requisite EA and EMPr; and
  - b. The ability of the measures contained in the EMPr, to sufficiently provide for the avoidance, management and mitigation of environmental impacts with the undertaking of the activity.
- c) Comply with the specifications of Appendix 7 of the 2014 Regulations as amended;
- d) Be conducted and submitted to the competent authority at intervals as indicated in the EA.

Section 32(3) states that the audit must determine:

- a) The ability of the EMPr to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an ongoing basis;
- b) The level of compliance with the provisions of the EA and EMPr.

Section 32(4) specifies that the findings of the audit must submit recommendations to amend the EMPr, if necessary should:

- a) Insufficient mitigation of environmental impacts associated with the undertaking of the activity be clear;
- b) Insufficient levels of compliance with the EA/EMPr be obvious.

According to Section 32(5), in the event that any amendments to the EMPr are necessary, such recommendations (as stipulated in Section 32(4)) must be subjected to public participation as agreed to with the competent Authority.

Irrespective whether any recommendations for changes/amendments result from the audit, the Audit Report must, within seven (7) days from the date of submission to the competent Authority, be made available to potential Interested & Affected Parties.

The outcomes of this audit have been separated into primary and secondary compliance as follows:

- Primary compliance is deemed to be compliance with the EA, Amended EA,
- Secondary compliance is deemed to be compliance with EMP EMPr Outcomes and General Principles of NEMA

### 3. ASSUMPTION, UNCERTAINTIES / GAPS IN KNOWLEDGE

As can be seen from the audit findings below, there are some uncertainties and gaps in knowledge (these are individually reflected in the respective tables. None of the instances where uncertainties were encountered have resulted in significant environmental impact as demonstrated in section 8.

#### 3.1 INFORMATION SOURCES

In order to support the conclusions reached in this Audit, a number of information sources were reviewed, including Cape EAPrac Records (Cape EAPrac provide an environmental control function for the construction of individual houses in the reserve), GGR's records as well as the DEA&DP files (Obtained via an application in terms of the promotion of access to information act).

The primary information reviewed included:

1. EA original, EA amendment 1, EA Amendment 2, EA – Horseback Safari
2. All of Delplans official approvals to subdivision and rezoning.
3. OEMP
4. Operational ECO checklists for individual houses
5. EAP file pertaining to third lodge.
6. EAP file pertaining to second EA amendment

In addition to the information available on Cape EAPrac's records, the following key documents were reviewed from the available hardcopy files at GGR as well as those obtained from DEA&DP via the PAIA application.

**Table 1:** Key documents reviewed from GGR and DEA&DP files

Description	Date	From/To	Proof	Comments
<b>KEY INFORMATION REVIEWED FROM GONDWANA GAME RESERVE FILES</b>				
Approval of building plans for Kwen Lodge	25/05/2015	Mossel Bay Municipality / Gondwana Game Reserve	<b>PHOTO 001</b> – Approval Letter <b>PHOTO 002</b> – Stamped Plans <b>PHOTO 003</b> – Area Schedule <b>PHOTO 004</b> – Site Layout Plan (showing originally approved and amended layout)	Please refer to discussion in section 4 regarding compliance with the associated invoices relating to these plans..
Amendment of the structure plan and Rezoning approval	20/07/2007	DEA&DP – Mossel Bay Municipality	<b>PHOTO 005</b> – Approval letter cover.	Compliance with conditions of Rezoning and structure plan amendments do not form part of

Description	Date	From/To	Proof	Comments
				this Audit.
Letter from Gondwana Game Reserve to Mr Danie Swanepoel and Mr Niel Lamprechts of DEA&DP requesting advice on reconfiguration of lodges	26/9/2008	GGR / DEADP	<b>PHOTO 006</b>	
Consent in terms of Act 70 of 70	26/06/2007	Department of Agriculture / Gondwana Game Reserve	<b>PHOTO 007</b> – Act 70 of 70 Approval cover page.	
General Authorisation from DWAF	17/03/2006	Department of Water Affairs and Forestry / GGR	<b>PHOTO 008</b> – GA cover Page.	
ECO Report August 2018	19/09/2008	Cape EAPrac / GGR	<b>PHOTO 009</b> – Cover page of ECO Report	ECO Report Dealt with compliance with Fynbos Camp #1, Fynbos Camp #3, Fynbos Camp #4, Fynbos Camp #5, Fynbos Camp #6, Fynbos Camp #7, Fynbos Camp #8, Fynbos Camp #9, Fynbos Camp #11, Fynbos Camp #13, Fynbos Camp #14, Fynbos Camp #15, Fynbos Camp #16, Fynbos Camp #17, Fynbos Camp #18, Fynbos Camp #20, Fynbos Camp #21, OTB construction site camp, Fynbos camp borrow pit, Sunset Ridge #15, Sunset Ridge# 13, Red Rocks Valley #27, Elephant and Rhino Bomas
Letter from Gondwana Game Reserve to DEA&DP requesting clarity on ROD condition relating to Lodge size	10/08/2006	GGR/DEA&DP	<b>PHOTO 010</b> – Letter requesting clarity on lodge sizes	
Confirmation of interpretation of lodge sizes from DEA&DP	21/08/2006	DEA&DP/ GGR	<b>PHOTO 011</b> – Confirmation of Lodge sizes from DEA&DP	DEA&DP confirmed interpretation relates to 500 square metres footprint for each lodge within a 2 ha area. NB – These sizes were amended in the amended EA

Description	Date	From/To	Proof	Comments
Notification of Record of Decision to I&AP's	7/07/2006	Hilland Associates to I&AP's	<b>PHOTO 012</b> – Cover page of I&AP Notification letter.	Copy of notification letter on file, but not proof of submission to I&AP's
Subdivision, Rezoning and consolidation advert	10/02/2006	Page 50, Mossel Bay Advertiser	<b>PHOTO 013</b> – English and Afrikaans Advert in Mossel Bay Advertiser	
Letter confirming I&AP's were notified of the ROD on 07 August 2006	16/08/2006	Hilland Associates/GGR	<b>PHOTO 014</b> – EAP confirming EA Notifications were done.	
Environmental Control Report 1	01/09/2008	Cape EAPrac/DEA&DP	<b>PHOTO 015</b> – Cover page	
Amendment of Rezoning and Sub Division Approval	07/11/2008	DELPLAN/ Mossel Bay Municipality	<b>PHOTO 016</b> – Rezoning amendment Application	
Construction Phase Environmental Management Programme	01/07/2006	Hilland Associates/DEA&DP	<b>Figure 35</b>	
<b>KEY INFORMATION REVIEWED FROM DEA&amp;DP FILES</b>				
Acknowledgement of Receipt of NID and Comment on exemption for horseback safari lodge.	07/04/2009	DEA&DP/ Cape EAPrac	<b>PHOTO 017</b>	
Architectural guidelines and contractors code of conduct (formed part of BAR for horseback Safari – H2)	Get from GGR – dated February 2008		<b>PHOTO 018</b>	
Final Scoping Report	Must get from somewhere???	Hilland Reference: HER04/448/21 dated September 2005	<b>PHOTO 019</b>	
Application and Scoping Checklist		Hilland Reference ; HER448/02 dated November 2004	<b>PHOTO 020</b>	
Town Planning Comment Cover and Recommendations.		Provincial planning – DEA&DP	<b>PHOTO 21</b> (Cover Page) <b>PHOTO 22</b> (RECOMMENDATIONS)	
Social Baseline Report	Hilland Reference HER445/16 June 2005.	Hilland Associates / DEA&DP		
Conservation and Biodiversity Assessment and Management Plan	Hilland Reference HER/04/448/20 September 2005  Updated June 2006 Version 3 Same reference number)	Hilland Associates / DEADP	<b>PHOTO 23</b> (Cover Page), 24, 25, 26 and 27 (Executive Summary) PROG (scanned doc)	
Construction Phase EMP	Hilland Reference (Unreferenced: August 2006	Hilland Associates - DEADP	<b>28</b>	

Description	Date	From/To	Proof	Comments
	Version 1			

The following additional information was reviewed from other files, including building plan files at GGR

1. Copies of standard building plans for the houses – i There are standard housing configurations that apply throughout the reserve, with very few deviations from these standard plans.
2. Copies of building plans for Lehele and Ulubisi (The “Horseback Safari Lodge”) lodges
3. Copy of Final Scoping Report as submitted to DEA&DP for Decision Making
4. Internal policy documents, including, Contractors code of conduct, Architectural guidelines and Homeowners code of conduct.
5. ECO Reports produced by HillLand Associates
6. Various Minutes, Agendas and invites from Hilland Associates to the ELC.

#### 4. PRIMARY COMPLIANCE CHECKLIST – EA

The project was originally authorised on 03 August 2006. Compliance with this EA is reflected in **Error! Reference source not found.** below.

As a quick reference, Full compliance with each EA condition is highlighted in **green**, partial compliance in **orange** and non-compliance in **red**. Conditions that are not auditable are reflected in **blue** along with the findings as to why such conditions cannot be audited. Conditions where compliance is unknown are reflected in **yellow** along with the assumptions made in this regard.

Table 2: Audit of compliance with EA of 03 August 2006

#	Condition	Discussion	Action
1	The activity, including site preparation, may not commence before the statutory thirty day appeal period expires. In the case of an appeal submitted to the competent authority, the effect of this Record of Decision will be suspended until such time as the appeal is decided.	Compliant – It is clear from the aerial image of 22 November 2006 that construction of civil services had not yet commenced. Refer to Figure 42.	No action required.
2	One weeks notice, in writing, must be given to the Directorate: Integrated Environmental Management (Region A), before commencement of construction activities Such notice must make clear reference to the site location details and reference number. The said notice must also include proof of compliance with the following conditions described in the EA: Conditions 1, 24, 25, 27 and 29.	This was done via the CEMP, which stated: <i>With the submission of this EMP a notice of intent to commence construction is hereby given. Construction is planned to commence on Wednesday the 13th of September 2006. Commencement of construction is subject to compliance with conditions 1, 24,25, 29 and 29 of the ROD (detailed below).</i>  <i>Condition 1: Requires that construction not commence before the statutory 30 day appeal period expires. This said period expires on the 3rd</i>	No Action required.

#	Condition	Discussion	Action
		<p>of September 2006.</p> <p>Condition 24: Requires that the applicant appoints a suitably experienced environmental control officer. Hilland Associates have been appointed as ECO for GGR. Dale Holder and Cathy Avierinos from Hilland Associates will monitor the site.</p> <p>Condition 25: Requires that the applicant compiles a construction phase environmental management plan (CEMP). The proposed CEMP is herewith submitted.</p> <p>Condition 27: Requires that an ELC be established. The first ELC meeting is scheduled to take place on Friday the 1st of September. Please see CEMP for terms of reference of the ELC.</p> <p>Condition 29: Requires that all I&amp;AP's be informed within 5 calendar days of the Record of Decision. Hilland Associates informed all I&amp;AP's on the 7th of August 2006.</p> <p>Also see Figure 32. Proof of compliance with conditions 24, 25, 27 and 29 are discussed separately below.</p>	
3	<p>One week's notice, in writing, must be given to the Directorate: Integrated Environmental Management before any property is transferred.</p> <p>Such notice shall make clear reference to the site location details and the reference number given above.</p> <p>The said notice must also include proof of compliance with the</p>	<p>No records of this notice letter were noted on either GGR's or DEA&amp;DP's file. Proof with condition 26 is discussed separately below.</p>	



#	Condition	Discussion	Action
	following conditions described herein. Conditions: 26.		
4	An integrated waste management approach must be used that is based on waste minimization and must incorporate reduction, recycling, reuse and disposal appropriate. Any solid waste shall be disposed of at a landfill licensed in terms of section 20 of the Environment Conservation Act, 1989.	The reserve has implemented a recycling program where organic and inorganic materials are separated. Inorganic materials are recycled and organic materials are used in the vermiculture project. All organic waste is given to the red wriggler worms that assist in the decomposition of the materials into nutrient rich compost. The compost is then diluted and used in the lodge and staff organic vegetable gardens as well as a newly developing plant nursery. Gondwana's indigenous tree nursery is underway where all plants that are propagated are indigenous to the region. Staff are sourced from the surrounding communities to run the project. Once the trees are large enough, they will be transplanted to areas on the reserve where previous land use has altered the landscape. This project in return promotes habitat improvement for fauna, recovery of the veld, job creation, and wise waste management. Private Residents on the reserve will be able to purchase the trees for planting around their bush home. Furthermore, it was clear from the site visit that there is further separation of waste into recyclable and non-recyclable material. Please refer to Figure 54. No disposal records were noted on the information that was reviewed.	GGR to maintain a register of disposal of waste.
5	The mitigation/rehabilitation measures and recommendations as detailed in the Scoping Report dated September 2005 and additional information (Ref: HER04/448/23 compiled by Hilland Associates,	Compliance with the EMPr's that incorporated these mitigation measures are discussed separately in the table below.	

#	Condition	Discussion	Action
	must be adopted, incorporated into the Environmental Management Plans and Implemented.		
6	All buildings, including Resort Zone II units and game lodges must be located on fallow lands	Before the construction of each of the resort zone II units, Cape EAPrac undertakes an inspection of the building footprint to ascertain that the demarcated position thereof is within one of the old fallow lands. See <b>Figure 36</b> . The results of the Audit identified buildings that were constructed outside of the general plan for the reserve. As evident from section Additional structures built within GGR7.2 of this report, all these instances were on fallow lands, with the exception of the tented ECO camp.	No Action Required. See suggested actions in section 7.2 for those applicable to the tented eco camp.
7	No buildings may be constructed on gradients of 1:4 and steeper	All resort erven are situated on areas outside of the 1:4 slopes. See <b>Figure 37</b> . All of the structures identified in 7.2 are situated on slopes of less than 1:4.	No Action required.
8	A minimum set back buffer of 20m must be set from the existing vegetation line for all buildings.	Before the construction of each of the resort zone II units, Cape EAPrac undertakes an inspection of the building footprint to ascertain that the demarcated position thereof is further than 20 m from the previous fynbos areas.. See <b>Figure 36</b> . The results of the Audit identified buildings that were constructed outside of the general plan for the reserve. As evident from section Additional structures built within GGR7.2 of this report, all these instances were set back further than 20 m from the previous vegetation line, with the exception of the tented ECO camp.	No Action Required. See suggested actions in section 7.2 for those applicable to the tented eco camp.
9	The footprint of the resort II units must not exceed 175m <sup>2</sup> and the erf size must not exceed 300m <sup>2</sup> . Height must be restricted to single storey	This office did not physically measure each and every one of the constructed houses, but	No Action Required.

#	Condition	Discussion	Action
	with lofts allowed in the roof space. The height of the Resort II units may not be more than 6.5m measured from the average ground level to the highest point of the roof.	did review the available building plans and can confirm that none of the Resort Zone II buildings exceeded the 175m <sup>2</sup> on any of the plans reviewed. It is reasonable to assume that in granting occupancy for each of the occupied units, the Mossel Bay confirmed that the buildings were constructed as per the plans – i.e. not exceeding the 175m <sup>2</sup> building footprint depicted on the plan. The Mossel Bay Municipal GIS viewer was queried and it is confirmed that all 96 of the Resort Zone II erven have been registered with the SG at exactly 300m <sup>2</sup>	
10	The Game lodges are restricted to a maximum size of 500m <sup>2</sup> and a maximum height of 5.5m measured from the average natural ground level to the highest point of the roof.	This condition has been amended by an application for amendment was authorised by the Department on 29 April 2009. This Amendment was granted to allow for the increase in footprint size of Kwena Lodge to 1 500m <sup>2</sup> . Lehele Lodge remained the same as was authorised and the third lodge (Ulubisi house) was authorised via a separate environmental authorisation.	No Further Action Required.
11	An Architectural Design Manual must be submitted to the Mossel Bay Municipality for Approval. In the Manual, it should be attempted to Minimise the visual impact through the use of colour and building materials. The Design Manual must address amongst others the following aspects: <ul style="list-style-type: none"> <li>- Height of buildings</li> <li>- Maximum floor area</li> <li>- Finishing, especially with regard to colour of buildings</li> <li>- Erf size</li> <li>- Fencing</li> <li>- Style of building</li> <li>- Lighting.</li> </ul>	An Architectural design manual was developed. See <b>Figure 38</b> .  A letter from the Mossel Bay municipality approving these guidelines was noted on any of the documents reviewed. It is however a reasonable assumption, considering that this condition also formed part of the rezoning and subdivision, that the fact that Mossel Bay Municipality have approved numerous	No Action Required.

#	Condition	Discussion	Action
		building plans, they are satisfied with the contents of the Architectural design manual.	
12	Each resort zone II unit must be built to the satisfaction of the municipality within 5 Years from the date of first transfer of the erf.	Please see discussion in section 7.1 for a detailed discussion in this regard.	Apply for an amendment of this condition in terms of regulation 30
13	Development must take place in phases. Services to a node must be installed and 80% of erven in that node must be sold before construction on a following phase (node) can be commenced with.	Without having access to deeds office documents for all 96 of the Resort Zone II units (in order to determine date of first transfer), it is not possible to audit compliance with this condition with a high level of confidence. It can however be stated that each of the housing nodes is fully serviced and that the developer only owns 10 of the 96 Erven. Currently, 89.6% of erven have been sold and thus compliant (the uncertainty is relating to historic compliance)	No action required
14	A rental pool must be established and all prospective homeowners must be encouraged to belong to the rental pool. This condition must be incorporated in the constitution of the Homeowners Association and the OEMP.	A rental pool has been established and a large number of homeowners already belong to this rental pool.	No action required
15	The various portions of Gondwana Game Reserve must be consolidated into one land parcel.	All original portions of the reserve, with the exception of the Resort Zone I & II footprints have been consolidated into a single land portion – Farm 376.	No Action Required
16	No subdivision of the consolidated Open Space III area is allowed without the prior written approval of the Department of Environmental Affairs and Development Planning and Cape Nature. This condition must be included in the title deed of the consolidated property.	A single subdivision of the consolidated open space took place since the project was authorised. This was done in order to relocate one of the Resort Zone II erven – i.e. consolidation of the old erf position and subdivision of the new position. Cape Nature and DEA&DP provided approval in this regard. See <b>Figure 40</b> .	No Action Required.
17	No buildings may be constructed in the Open Space III area. The footprint of all buildings must be zoned appropriately.	See section 7.2 for further discussions in this regard.	See section 7.2 for recommended actions for buildings constructed in the Open Space Area..
18	The temporary fuel storage,	None of the construction	

#	Condition	Discussion	Action
	including decommissioning, must comply with the mitigation measures contained in appendix 3 of the additional information to the Scoping Report and all relevant SABS standards.	phase ECO reports (Compiled by Hilland Associates) identified any incidences of Fuel Storage not complying with the requirements of this appendix. From the content of the reports it would seem that the contractor at the time opted to make use of mobile refuelling units as opposed to bulk storage. Furthermore, bulk fuel storage did not take place as part of the construction of the Resort Zone units.	
19	<p>The following resource conservation measures must be implemented:</p> <ol style="list-style-type: none"> <li>1. Rainwater from roofs must be collected and stored in rainwater tanks. No taps linked to piped, potable water may be installed outside buildings. All water used outside buildings must be collected rainwater.</li> <li>2. All resort units and lodges must be fitted with and use low flow showerheads and double flush toilets.</li> <li>3. All resort units and lodges must be fitted with and use solar hot water systems.</li> </ol>	<ol style="list-style-type: none"> <li>1. The approved Architectural style makes effective rainwater capture from roofs unfeasible. That being said, during the Audit inspection only 6 external water points were noted across the Resort Zone II and Resort Zone I units. The majority of these were not in use and purely in place for fire fighting purposes (in which case rainwater storage would not sufficient for the volume and pressure legislatively required for firefighting purposes).</li> <li>2. While not possible to determine if every single resort II unit has installed low flow shower heads and dual flush toilets (The audit consultant does not have access to the inside of each of the houses), it is confirmed that these have been</li> </ol>	<p>Condition 19(1) should be amended via an application in terms of regulation 30 to make provision for the approved architectural style and legislated fire fighting requirements.</p> <p>Condition 19(3) should be amended via an application in terms of regulation 30 to make provision for alternative energy saving outcomes (such as heat pumps)</p>

#	Condition	Discussion	Action
		<p>installed at the resort zone I units – See Figure 58.</p> <p>3. Solar water heaters have been installed on the staff housing. The outcome of this condition has been achieved by the installation of energy saving water heating appliances.</p>	
20	<p>Abstraction of surface water may not exceed 38000 cubic meters per annum, 104 cubic meters per day or 1.8 liters per second over a 16 hour period per day.</p> <p>A maximum of 15% of the Mean Annual Runoff (MAR) may be abstracted from any given watercourse.</p>	GGR do not currently have metres installed on their abstraction pumps, as such, compliance with this condition cannot be audited with a high level of confidence.	GGR to install metres and keep monthly records, of all water abstraction.
21	<p>Groundwater may not be abstracted for use on the reserve, except in the event of extreme droughts where there is not sufficient surface water flow to abstract the required volume as per condition 16.</p>	No incidences of groundwater abstraction were noted in the audit.	No action required.
22	<p>The conditions set by the department of health in the letter dated 10 May 2005 must be complied with:</p> <ol style="list-style-type: none"> <li>1. There must be a sufficient supply of potable water. Ninham Shand has calculated the annual average daily demand (AADD) for potable water as 104 cubic metres per day.</li> <li>2. The water must comply with the bacteriological and chemical standard for drinking water.</li> <li>3. The management of Gondwana Game Reserve must at all times be held responsible for the supply of potable water.</li> <li>4. Water must be monitored by the Management of Gondwana Game Reserve on a regular basis for bacteriological and chemical quality.</li> <li>5. The results of these samples must be kept on record and be available on request by a competent authority.</li> </ol>	<ol style="list-style-type: none"> <li>1. Three reservoirs have been installed to ensure sufficient capacity of storage. See <b>Figure 41</b>.</li> <li>2. See Figure 34 showing that water complies with the minimum requirements for drinking water.</li> <li>3. Noted, but not auditable.</li> <li>4. Periodic testing is undertaken by GGR, an example of such is shown in Figure 34.</li> <li>5. These are available at request from the competent authority.</li> </ol>	No action required.
23	Only locally indigenous plant species	A single individual exotic	The single agave

#	Condition	Discussion	Action
	may be used in landscaping and rehabilitation.	plant (Agave) was identified at lehele lodge. And this single instance is not deemed to be contravention of this condition. See Figure 57.	plant at Lehele Lodge to be removed.
24	The applicant must appoint a suitably experienced, independent Environment Control Officer before commencement of any land clearing activities to ensure the mitigation measures and recommendations referred to in this record of decision are implemented and to ensure compliance with the Construction phase EMP. The ECO must be appointed until all construction, including the housing units have been completed.	During construction, Hilland Associates undertook this role. Cape EAPrac currently undertakes an ECO inspection of every new Resort Zone II unit before it commences construction.	No Further Actions Required.
25	<p>The applicant must compile and submit an acceptable construction phase Environmental Management Plan ("CEMP"), for the installation of the services, roads and residential units to this directorate. The EMP must:</p> <ol style="list-style-type: none"> <li>1. Be submitted to the directorate at least three weeks prior to construction activities commencing. This must be approved prior to any land clearing and construction commencing.</li> <li>2. Describe the level and competency of the Environmental Control Officer.</li> <li>3. Define and allocate the roles and responsibilities of the ECO referred to above, and the Environmental Site Agent where applicable.</li> <li>4. Determine the frequency of site visits.</li> <li>5. Be include in all contract documentation for the construction phase of the development.</li> <li>6. Also address the impacts associated with the construction of the individual resort units and lodges.</li> <li>7. Include all mitigation /rehabilitation measures and recommendations as detailed in the Scoping Report dated September 2005 and additional information compiled by Hilland Associates, relevant to the construction phase.</li> </ol>	This was compiled and submitted to DEA&DP prior to construction. A copy of this document was present in DEA&DP's files - Figure 35. No copies of an approval letter were found on DEA&DP's nor GGR files.	DEA&DP to provide comment whether the CEMP was approved.



#	Condition	Discussion	Action
	8. Include a phase plan for construction.		
26	<p>The applicant must compile and submit an acceptable operational phase Environmental Management Plan for the entire property. This must be approved before any of the erven or units are transferred. The OEMP must:</p> <ol style="list-style-type: none"> <li>Clearly outline the management strategies and address the ecological corridor needs of the proposed GI corridor. The following aspects must be addressed as part of this EMP:</li> </ol> <ul style="list-style-type: none"> <li>- Vegetation/habitat unit transformation and sensitivity maps and descriptions;</li> <li>- Retaining locally indigenous Protea species particularly for the nectivores.</li> <li>- Eradication of Invasive Alien vegetation.</li> <li>- Fire Management Plan</li> <li>- Rehabilitation, restoration and re-vegetation plan.</li> <li>- Wildlife Management Plan including stocking strategies and management</li> <li>- Road and path maintenance.</li> <li>- Water Management.</li> <li>- Contingency plan for disease management, escapees.</li> <li>- Draught / low rainfall events.</li> <li>- Future expansion intentions.</li> <li>- Visitor management;</li> <li>- Security.</li> <li>- Auditing and monitoring.</li> <li>- Roles and responsibilities for the Home owners association, owners of Gondwana Game Reserve, Steering Committee and all other role players and stakeholders.</li> <li>- Ensuring adequate funding for ecological management of the reserve etc.</li> <li>- All reasonable measures to be taken to rehabilitate the approximately 35% modified vegetation consisting of grassy cultivated and pasture areas to its original state. Indigenous palatable grasses may be used initially during rehabilitation but no cultivation or irrigation may</li> </ul>	<p>It is clear that GGR did develop an operational phase environmental management programme (Figure 31) in September 2007 and that this was submitted to the DEA&amp;DP, as a copy of which was found to be on their files. No records of a letter from the department approving this document were noted on either the files of GGR, or those of DEA&amp;DP.</p>	<p>DEA&amp;DP to provide comment whether the OEMP was approved.</p>



#	Condition	Discussion	Action
	<p>be used to artificially increase the the carrying capacity of the Game Reserve. The aim of the rehabilitation should not to be to increase the forage potential and carrying capacity, but rather to reinstate the biodiversity that was lost when the area was transformed.</p> <ul style="list-style-type: none"> <li>- The mitigation / rehabilitation measures and recommendations as detailed in the scoping report dated September 2005 and additional information compiled by Hilland Associates relevant to the operational phase.</li> <li>- Gondwana Game Reserve must be managed as a game/nature reserve and not as a game farm. This implies that the focus will be on maintaining and reinstating the natural ecological systems and processes, limiting the introduction of extra limital game species and limitingany human intervention aimed at increasing the carrying capacity for game, i.e. cultivation or irrigation of land.</li> </ul>		
27	<p>An environmental Liaison Committee must be established at the cost of the applicant prior to commencement of the construction phase.</p> <ol style="list-style-type: none"> <li>1. The applicant must draw up the ELC's draft terms of reference and submit it to this directorate. This must be approved by this directorate prior to any land clearing or construction commencing.</li> <li>2. The TOR must include but not limited to the following: <ul style="list-style-type: none"> <li>- The frequency of meetings and reports,</li> <li>- Chairmanship / Membership,</li> <li>- Auditing requirements</li> <li>- Duties and responsibilities during the construction phase,</li> <li>- The termination of such an ELC,</li> <li>- The frequency of providing feedback to the local</li> </ul> </li> </ol>	<p>This was established, but disbanded after completion of the construction phase of the development. The final ELC meeting took place on 18 September 2008 and DEA&amp;DP was present at this meeting.</p>	<p>No further actions.</p>

#	Condition	Discussion	Action
	community, - The Role of the local municipality.		
28	<p>The applicant must submit an environmental Audit Report to this directorate annually until construction of all infrastructure and buildings have been completed,</p> <ol style="list-style-type: none"> <li>1. The audit report must indicate the progress of the construction phase, detail compliance with the conditions of this authorization, and the status of the rehabilitation programme.</li> <li>2. This directorate may require remedial action should the audit report reflect that is rehabilitation is inadequate.</li> <li>3. If the audit report is not submitted this directorate, this directorate may give 30 days written notice and may have such an audit undertaken at the expense of the applicant and may authorize any person to take such measures necessary for this purpose.</li> </ol>	<p>This Audit satisfies this requirement albeit outside of the timeframes provided for.</p>	<p>This condition should be amended to align with Regulation 54 of the 2014 EIA regulations (i.e. that an audit be undertaken every 5 years)</p>
29	<p>The applicant must , within 5 calendar days of the date of issue of this Record of Decision</p> <ul style="list-style-type: none"> <li>- Inform I&amp;AP's of the outcome of this application and if requested, provide copies of this record of decision within a reasonable time before the expiry of the appeal period.</li> <li>- Include in such information the provisions of regulation 11 of Government Notice NO. R1183 of 5 September 1997 as amended.</li> <li>- Include the date on which the record of decision was issued to the applicant and the date on which appeals must reach the Minister.</li> <li>- Inform all I&amp;AP's that a signed and certified Appeal Questionnaire is obtainable from the Ministers Office.</li> <li>- If the applicant should appeal against the Record of Decision, he must be inform all interested and affected parties that such an appeal is being lodged.</li> </ul>	<p>Refer to Figure 22 and Figure 24.</p>	<p>No action required</p>
30	All outdoor advertising associated	All signage to the reserve	No action required.

#	Condition	Discussion	Action
	with this activity, whether on or off the property concerned, must comply with the applicable local authority bylaw for the control of Outdoor Advertising or in the absence of local legislative controls, must comply with the South African Manual for Outdoor Advertising.	(from the N2 as well as the provincial road) is within the limits defined in this manual	
31	The applicant shall be responsible for ensuring compliance with the conditions contained in the record of Decision by any person acting on his behalf, including but not limited to, an agent, servant, employee or any person rendering a service to the applicant in respect of the activity, including but not limited to contractors and consultants.	This overarching clause forms part of the EMPr and compliance therewith has been demonstrated via the various ECO reports as well as this Audit.	
32	The owner and/or developer must notify this department and any other relevant authority, in writing, within 24 hours thereof if any condition of this authorization is not adhered to.	Apart from the non-compliance associated with the timeframes for submission of an Audit, no other condition has not been adhered to.	
33	Department officials shall be given access to the property referred to in B Above for the purposes of assessing and/or monitoring compliance with the conditions contained in this record of decision.	GGR has not refused access to any persons in their official capacity from undertaking monitoring and compliance inspections on the reserve.	No further actions required.

## 5. SECONDRY COMPLIANCE CHECKLIST – EMPR OUTCOMES

The CEMP compiled by Hilland Associates was reviewed and compliance with this document is shown in the table below<sup>1</sup>.

As a quick reference, Full compliance with EMP outcomes is highlighted in **green**, partial compliance in **orange** and non-compliance in **red**. Conditions that are not auditable are reflected in **blue** along with the findings as to why such conditions cannot be audited. Conditions where compliance is unknown are reflected in **yellow** along with the assumptions made in this regard.

**Table 3:** Audit of compliance with EMPr outcomes.

EMP Outcome / with summary of actions	Discussion	Action
<b>Waste Management</b>	Discussed in EA Compliance tables in section 4	Refer to actions highlighted in section 4
<b>Environmental Control Officer (condition 24)</b>	Discussed in EA Compliance tables in section 4	Refer to actions highlighted in section 4
<b>Environmental Liaison Committee (Condition 27)</b>	Discussed in EA Compliance tables in section 4	Refer to actions highlighted in section 4
<b>Development Phasing (Condition 13)</b>	Discussed in EA Compliance tables in section 4	Refer to actions highlighted in section 4

<sup>1</sup> The EMPr was compiled in terms of the previous regulations and as such did clearly differentiate between EMPr Outcomes and EMPr Actions. The Outcomes and actions reflected in the compliance Table are thus Cape EAPrac's interpretation of the intent of the EMPr provisions.

EMP Outcome / with summary of actions	Discussion		Action
<b>Temporary Fuel Storage (Condition 18)</b>		Discussed in EA Compliance tables in section 4	Refer to actions highlighted in section 4
<b>Contractors Site Camp</b> <ul style="list-style-type: none"> <li>- approved by the ECO.</li> <li>- not located within or adjacent to an environmentally sensitive area.</li> <li>- within the construction area.</li> <li>- fenced off and no encroachment beyond the approved site will be permissible.</li> <li>- Portable ablution facilities</li> <li>- No accommodation</li> </ul>		The civil contractors site camp was set up in at the site where Lehele lodge, with satellite camps within each housing node was constructed. Individual house camps are minimal and situated adjacent to the erf at the access road. GGR has been compliant with these requirements.	No actions required.
<b>Demarcation of No-go Areas</b>		This is done in compliance with the EMPr and GGR's own contractors code of conduct which is strictly enforced.	No actions required.
<b>Fire protection</b>		No accidental fires due to negligent activities have been recorded on GGR to date. Fires have occurred on the reserve, but these have all been part of the ecological burning programme.	No actions required.
<b>Use of Local Labour</b>		These records were kept by the principal contractor (OTB Construction) and were not available to Cape EAPrac at the time of this Audit.	No actions required.
<b>Stabilization of construction Area</b>		No instances of erosion on the previous construction areas were noted by the audit consultant and as such it can be assumed with a high level of confidence that the contractor at the time complied with the actions outlined in this requirement.	No actions required.
<b>Environmental Education</b>		It is clear from the ECO reports reviewed (as compiled by Hilland Associates) that Environmental induction did take place with construction staff)	No actions required.
<b>Trenching Requirements</b> <ul style="list-style-type: none"> <li>- Ensure proper separation of topsoils and subsoils during trenching.</li> </ul>		All previous service trenches have recovered to the same extent as surrounding areas (no trenching scars visible along any of the services) and as, we can deduce that the contractor complied in this regard	No actions required.
<b>Litter and waste</b>		It is clear from the ECO reports reviewed (as compiled by Hilland Associates) that effective waste management took place during the construction period.	No actions required.
<b>Topsoil Stripping</b>		All previously disturbed areas	No actions required.

EMP Outcome / with summary of actions	Discussion		Action
As topsoil is a valuable resource, it should be stripped from all construction areas before work commences. This topsoil should be stockpiled for use in rehabilitation and landscaping and must not be contaminated with other building materials or subsoil.		were noted to be in the same condition as adjacent undisturbed areas. No visible subsoils were observed at previous construction areas.	
<b>Noise</b>		None of the ECO reports reviewed (as compiled by Hilland Associates) identified issues or concerns relating to noise..	

Although the CEMP was developed in terms of the previous regulations, the findings of this audit have not found Insufficient mitigation of environmental impacts associated with the undertaking of the activity, nor have insufficient of compliance with the EA/EMPr been obvious.

It must be noted that other than the legislatively required management documents<sup>2</sup>, GGR have a multitude of internal management plans and policies that have assisted in the overall high level of compliance shown.

## 6. INCONSISTENCIES BETWEEN EA AND EMPr

No specific inconsistencies between the EA and EMPr were noted. There are however a number of conditions in the EA and Actions in the EMPr that are not auditable or completed. Please refer to the items in blue in the tables above for further details in this regard.

## 7. DISCUSSION OF AUDIT FINDINGS

This section elaborates on the findings of the primary and secondary compliance findings detailed above.

### 7.1 PROGRESS WITH CONSTRUCTION OF RESORT ZONE II UNITS.

In order to consider compliance aspects associated with EA conditions 12 and 13, it is important to understand the status of construction on the resort zone II erven at GGR.

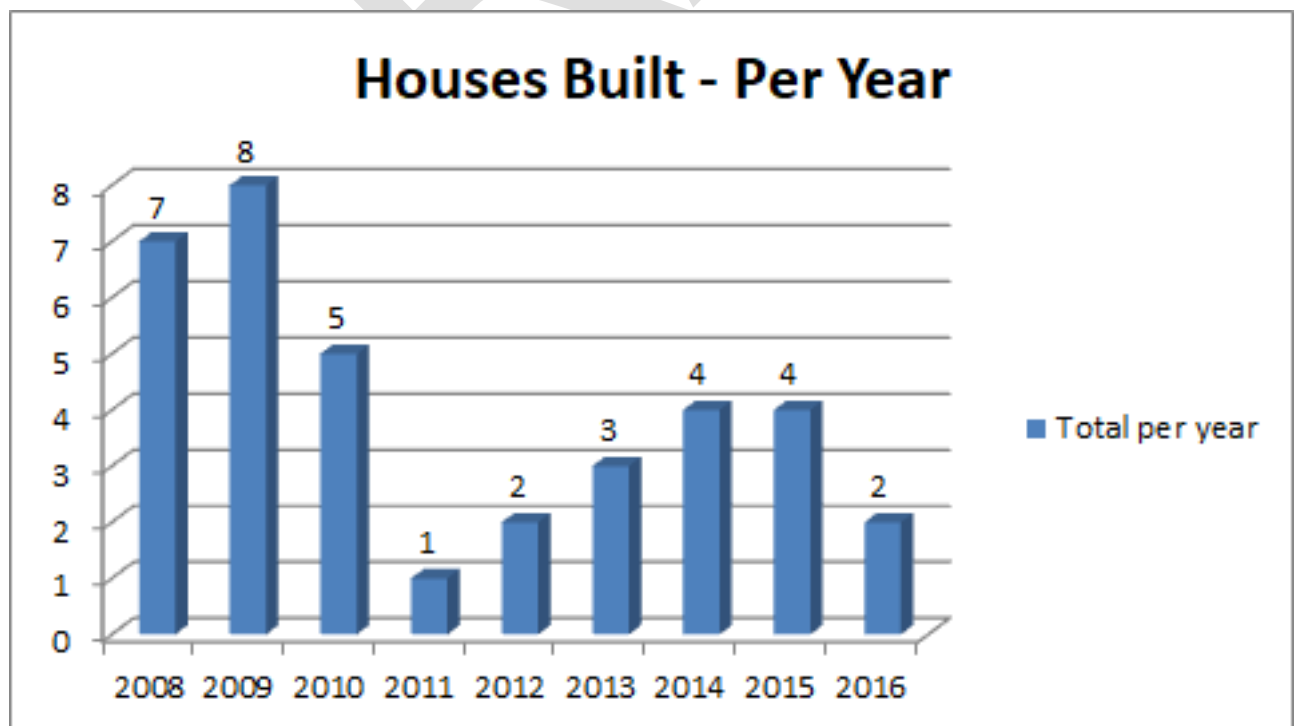
**Table 4:** Showing progress with construction on Resort Zone II erven

Resort Erven Number	Built / Vacant	Resort Erven Number	Built / Vacant	Resort Erven Number	Built / Vacant
1	B	36	V	75	B
2	V	37	V	76	V
3	B	38	V	77	V
4	B	39	V	78	V
5	B	40	V	79	V
6	B	41	B	80	V
7	V	42	V	81	V
8	B	43	V	57	V
9	B	44	V	56	B
10	B	45	V	55	B
11	B	46	V	54	B
12	V	47	B	82	developer

<sup>2</sup> Including the Construction and operational phase EMPr's

Resort Erven Number	Built / Vacant	Resort Erven Number	Built / Vacant	Resort Erven Number	Built / Vacant
13	B	48	V	83	developer
14	B	49	B	84	developer
15	B	50	V	85	developer
16	B	51	B	86	B
17	B	52	V	87	B
18	B	53	B	88	B
19	V	58	V	89	V
20	B	59	V	90	Building
21	B	60	V	91	developer
22	V	61	V	92	developer
23	V	62	V	93	developer
24	V	63	B	94	developer
25	V	64	V	95	developer
26	B	65	V	96	developer
27	V	66	V		
28	V	67	V		
29	V	68	V		
30	V	69	V		
31	V	70	V		
32	V	71	V		
33	V	72	V		
34	B	73	V		
35	B	74	V		

From the above table it is demonstrated that 35 of the resort zone erven are constructed or under construction, 10 are still owned by the developer and have not been transferred, while 51 remain undeveloped.



**Figure 1:** Showing number of Resort Zone II units built per year on Gondwana Game Reserve.



Condition 12 of the EA required that each resort zone II unit must be built to the satisfaction of the municipality within 5 Years from the date of first transfer of the erf. Without access to the deeds office documents for each of the 96 erven, this office cannot with a high level of confidence confirm whether more than 5 years have passed since the first transfer of the 51 undeveloped erven. It can however be deduced that the 5 year period since first transfer has lapsed on some of these erven.

One needs to consider the intent of this condition, which was to prevent a scenario where construction rights remain in place indefinitely, but that housing nodes remain undeveloped. It is clear from the number of the houses built per year, that these are closely linked to the economic climate at any particular time. Resort units have been constructed in each one of the housing nodes, and although GGR has not been fully compliant with this condition in terms of the timeframes, we believe that they are compliant with the intent of this condition.

## 7.2 ADDITIONAL STRUCTURES BUILT WITHIN GGR

A number of additional structures not reflected on the General plan for GGR were identified as part of this audit.



**Figure 2:** Showing structures built on Gondwana Game Reserve that are not reflected on the general plan for GGR.

For the purposes of this environmental audit, only structures constructed on the areas zoned as open space IV are discussed as these have implications in terms of EA compliance.

All these structures were built between November 2015 and February 2017

**Table 5:** Type and date of additional structures constructed on GGR.

Site	Structure	Date Built
Staff village	Tents on Decks	Feb-17
APU Camp	Tents on Decks	Dec-16
Eco Camp	Tents on Decks	Dec-16
Kwena Laundry	Brick with Tin roof	Nov-16

Kwena Staff village	Brick with Tin roof	Nov-15
---------------------	---------------------	--------

### 7.2.1 Anti Poaching Training Camp (APU Camp).

GGR have established an anti-poaching training camp consisting of:

- 7 x Tents for accommodation of students
- 1 x Mess tent
- 1 x Classroom Tent
- Kennel for working dog.



**Figure 3:** High resolution aerial image of the anti-poaching training facility on GGR.

The anti-poaching training camp is situated in an area surrounded by dense stands of alien invasive vegetation. It is situated on an area that was previously disturbed farm lands (not within one of the natural areas). The establishment thereof is not in contravention of condition 6 of the EA.



**Figure 4:** 2005 Aerial Image position of anti-poaching training facility within the previously disturbed lands

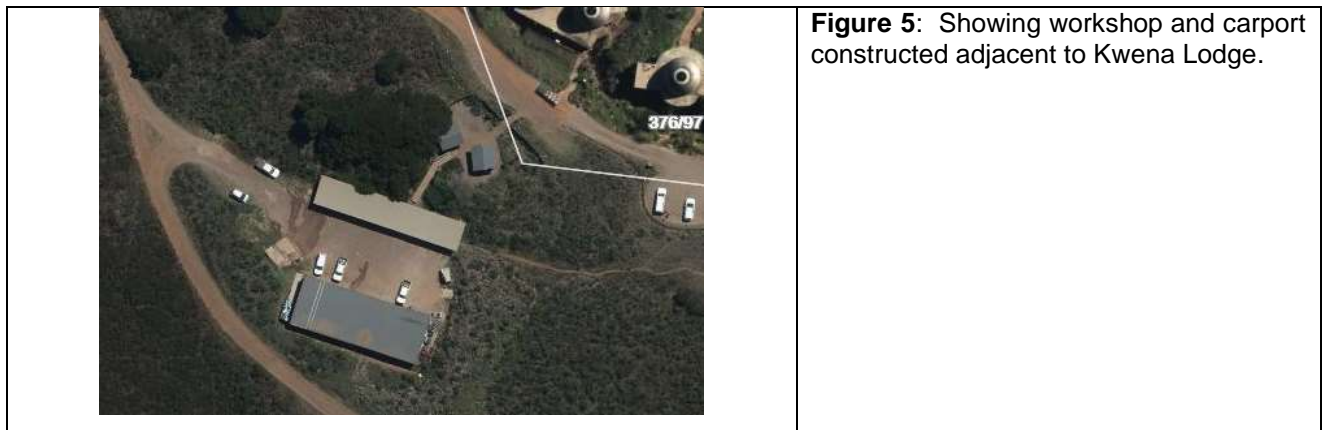
Mr Henry Paxton (GGR's architect) undertook a meeting with the Mossel Bay Municipality in relation to the tented structures on Gondwana Game Reserve. During this meeting it was confirmed that the National Building Regulations do not make provision for tented structures – A tented camp such as the anti-poaching training facility is thus considered as a temporary structure and not subjected to the same requirements as typical brick and mortar buildings.

Considering both the location and type of structures (the reasoned view that a tent does not constitute a building) used for this anti-poaching training facility, it is concluded that the establishment thereof does not contravene the requirements outlined in condition 6 And 17 of the ROD.

### 7.2.2 Laundry/Store and Carport - Kwena Lodge

A laundry/store and carport associated with Kwena Lodge have been constructed. Although directly associated with the lodge, they have been constructed outside of the Resort Zone 1 erf (376/97).





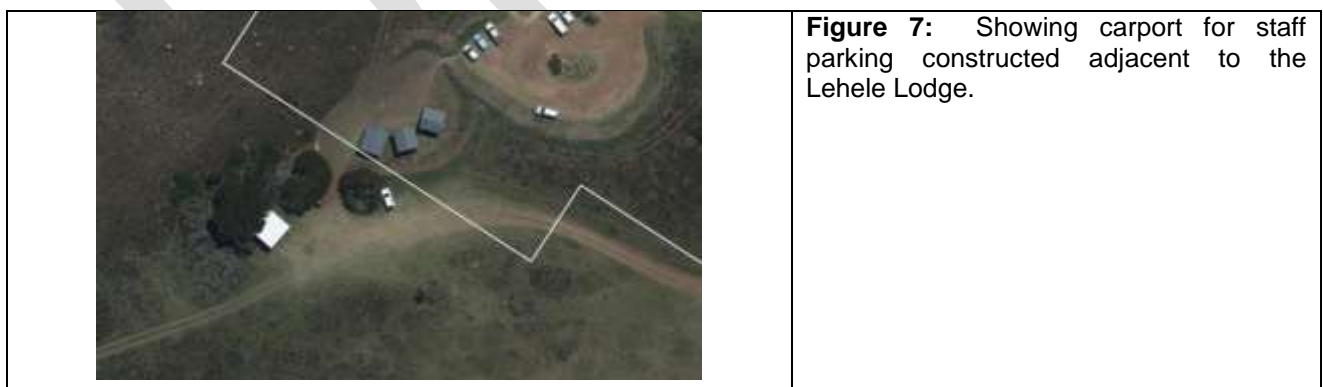
The construction of this carport and laundry/store outside of the Resort Zone 1 Erf is thus in contradiction to condition 17 of the ROD. It is recommended that GGR rezone the footprint of this building as is required in condition 17. In compliance with condition 16 of the EA, comment must be obtained from both Cape Nature and DEA&DP before effecting this rezoning.

The position of this carport and store is however situated on one of the previously fallow lands and as such is not in contravention with condition 6 of the EA.



### 7.2.3 Carport - Lehele Lodge

A carport for staff parking associated with Lehele Lodge has been constructed. Although directly associated with the lodge, it has been constructed outside of the Resort Zone 1 erf (376/98).



The construction of this carport outside of the Resort Zone 1 Erf is thus in contradiction to condition 17 of the EA. It is recommended that GGR move the carport to within the Resort Zone erf (33m to the East).

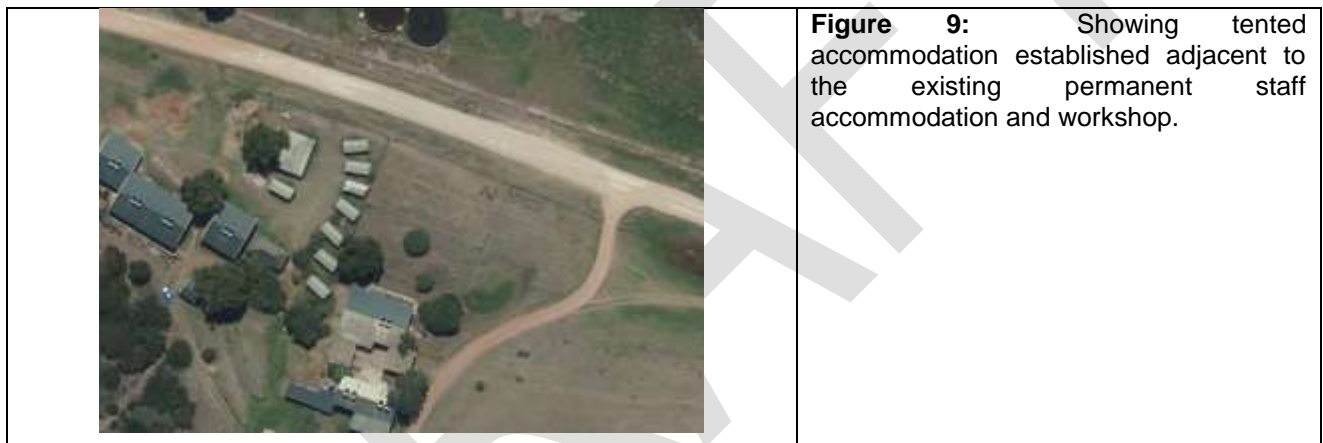
The position of this carport is however situated on one of the previously fallow lands and as such is not in contravention with condition 6 of the EA.



### 7.2.4 Tented Staff Accommodation

GGGR established tented staff accommodation adjacent to their existing staff accommodation and workshops. This tented staff accommodation consists of the following:

- 8 x accommodation tents
- 1 x Mess tent



Although this area (staff housing and workshops) is situated outside of the fenced reserve boundaries, it retains the Open Space 4 zoning.

GGR's architect, Mr Henry Paxton undertook a meeting with the Mossel Bay Municipality in relation to the tented structures on Gondwana Game Reserve. During this meeting it was confirmed that the National Building Regulations do not make provision for tented structures – A tented camp such as the anti-poaching training facility is thus considered as a temporary structure and not subjected to the same requirements as typical brick and mortar buildings.

Considering both the location (on old fallow lands) and type of structures (the reasoned view that a tent does not constitute a building) used for this tented staff accommodation, it is concluded that the establishment thereof does not contravene the requirements outlined in condition 6 and 17 of the EA.

### 7.2.5 Eco Camp

Gondwana installed 4 tents as part of an ECO camp in a portion of the open space. The intent with this camp was for guests to be involved in wildlife and veld management, learn important outdoor skills and environmental interpretation.

This total footprint of the tented camp is below the threshold for activities listed in Listing notice 3 (Activities 12 and 15 in listing notice 3 are not triggered by the establishment of this tented camp), but is situated outside of the old fallow lands, within an area zoned as open space. It is thus recommended that DEA&DP and Cape Nature retrospectively provide comment in terms of condition 17 of the EA.

### 7.3 DEVELOPMENT OF A VEGETABLE GARDEN ON GGR.

GGR began to establish a vegetable garden on an area outside of the Reserve, but on an area still zoned for Open Space IV. This project was however abandoned when a neighbouring landowner lodged a complaint with DEA&DP compliance and enforcement.



**Figure 10:** Showing area outside the Reserve, where GGR commenced with the establishment of a vegetable garden.

The intent of this vegetable garden was to provide opportunities of unemployed family members of GGR employees to contribute towards their own food security and to possibly generate an income into the future.

This area was historically used for agricultural purposes as can be seen from paddocks present on historical aerial imagery as well as the the presence of irrigation piping and terracing on the area.



**Figure 11:** 2009 Aerial imagery showing agricultural infrastructure at the position of the vegetable garden



**Figure 12:** Showing current state of the area where GGR commenced with the establishment of a vegetable garden

The establishment of a vegetable garden at this position is not in contravention of conditions 6 or 17 of the EA. The affected area is approximately 500 square metres and does not contain indigenous vegetation as defined in regulation 324. Activities 12 and 15 in listing notice 3 are not triggered by the establishment of this vegetable garden. It is therefore the finding of this Audit report that GGR be allowed to continue to establish this vegetable garden at its current position on condition that removal of indigenous vegetation does not take place.

### 7.4 WASTE MANAGEMENT INCIDENT.

During the Audit, it was found that an incident occurred, where GGR utilised spoil material to repair an erosion gully formed by the 2006 floods. This spoil material contained asbestos waste, and the National Department of Environmental Affairs investigated the incident.



Cape EAPrac undertook an investigation of this incident, which included the following:

- delineation of the area affected by the unlawfully disposed of waste;
- determination of the volume of asbestos waste which was unlawfully disposed of on the said property;
- a professional view of the possible soil, surface and groundwater impacts which the unlawfully dumped asbestos waste has had and / or may have had on the receiving environment;
- proposed rehabilitation measures, if any, to be implemented at the affected areas where the waste has been buried / removed from; and
- time-frames for the implementation of the rehabilitation measures, if any, mentioned in 13.3(d) above.

The terms of reference for this site assessment were:

1. Spatial delineation of the entire area of the spoil site;
2. Inspection of surface of the spoil site for asbestos waste;
3. Excavation of a series of trial holes to inspect for presence of asbestos waste;
4. If any visible traces of asbestos are still present, quantify the volume and type;
5. Make recommendations for further assessment if necessary (water or soil monitoring);
6. Make recommendations relating to the rehabilitation and/or remediation of the spoil site;
7. Provide context of human exposure likely under current or future site conditions;
8. Provide a reasoned opinion on potential soil, surface and groundwater impacts the receiving environment.
9. Provide an implementation and monitoring action plan for any recommendations made in point 5 and 6 above.

#### 7.4.1 CONTEXTUAL BACKGROUND

During the floods of 2006, a blocked culvert along the Provincial Road caused water to overtop the road and flood an adjacent field on the GGR and other properties. This resulted in the formation of a significant erosion gulley across this portion of property.



**Figure 13:** Showing culvert (1x Armco and 2 x concrete pipes) that blocked and caused flooding of adjacent land on GGR.

During these flood conditions, the water moved as overland flow and started to form an erosion gulley approximately 97m from the edge of this unnamed watercourse.

The original extent of the erosion gulley is clearly visible on the 2009 Aerial Image.



**Figure 14:** Showing original extent of erosion gulley on GGR (Aerial Image 2009)

As can be seen in this image, the gulley stopped at a position and continued as overland flow, where after it again formed a gulley on adjacent farms. The section of the original gulley on the adjacent farm is now cultivated lands.

It is the repair of portions of this erosion gulley in which the building rubble containing asbestos was spoiled to land.

#### 7.4.2 DELINEATION OF AFFECTED AREA.

The area where waste (and other material) was disposed to land was delineated by Cape EAPrac. The delineated area is approximately 45m long and approximately 7m wide at its widest point. The depth of infill is approximately 1.1m deep at its deepest (although this depth tapers shallower relatively quickly from the center point of the original erosion channel. The measured delineation is 331m<sup>2</sup>.

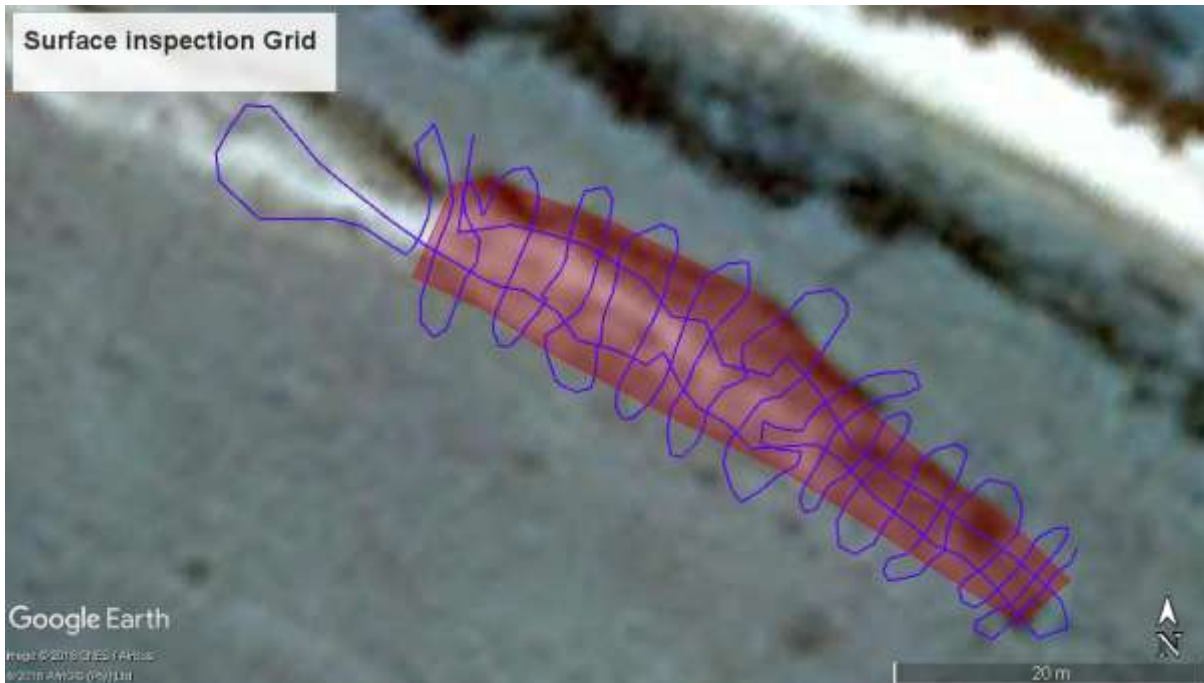




**Figure 15:** Delineated spoil area on 2016 Aerial Image

### 7.4.3 DETERMINATION OF REMAINING WASTE IN AFFECTED AREA

In order to determine the presence of any remaining asbestos contaminated building rubble (as GGR had already removed the asbestos containing waste from this area), Cape EAPrac undertook a surface inspection of the delineated area and surrounds. A grid of the total delineated area was walked to ensure the entire area was covered.



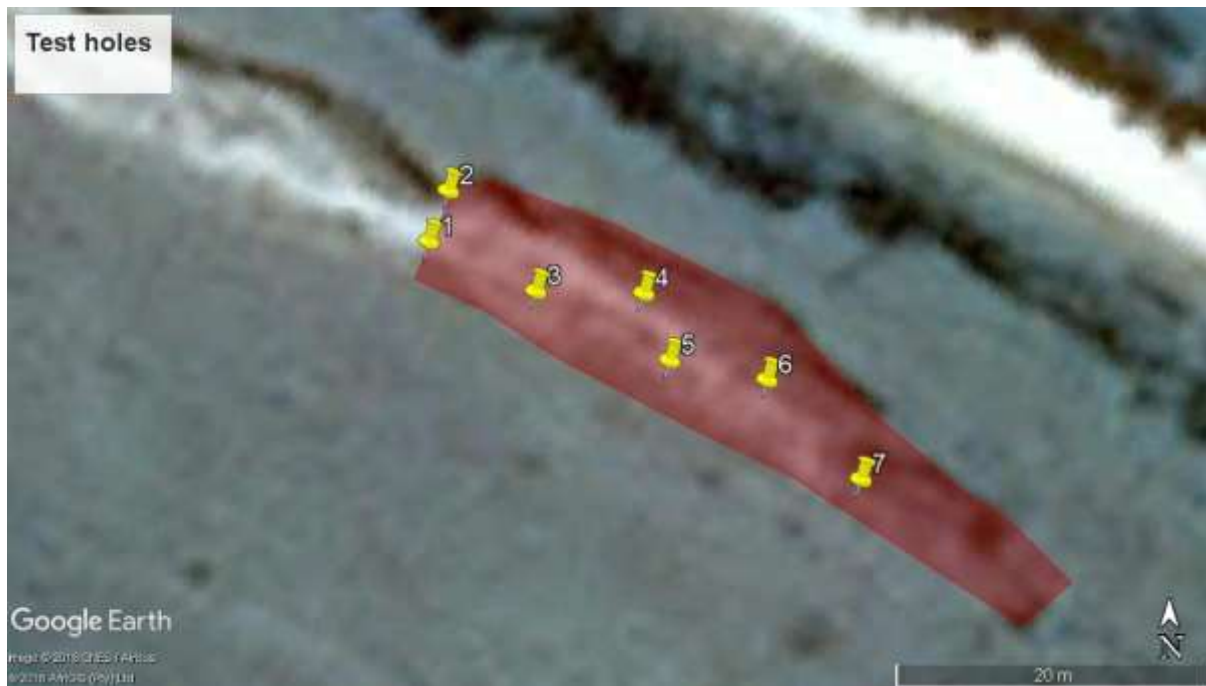
**Figure 16:** Showing grid walked to determine the presence of any waste on the surface of the delineated spoil area.

During the surface inspection, no building rubble, nor asbestos waste was observed on the surface as can be seen in the typical photos of the current condition of the delineated area.



**Figure 17:** Photographic examples of typical surface conditions of delineated spoil area.

Further to the surface inspection the existing fill profiles were inspected and a number of trial holes were dug to determine the presence of subsurface waste.



**Figure 18:** Position of trial holes dug to determine the presence of sub-surface waste.

During the inspection of the trial hole and profile inspections, no building rubble, nor asbestos waste was observed in the sub-surface layers. The contents of the fill within the delineated area included:

- Biomass in the form of mostly branches and stumps (seemingly from alien vegetation clearing),
- Pebbles and boulders (Source unknown),
- Sandy subsoil, and
- Topsoil.

The photo plates below show typical examples of the subsurface contents of the delineated spoil area.



**Figure 19:** Typical examples of subsurface contents of spoil material within delineated area.

Considering the above, it can be stated with a high level of confidence that GGR competently removed all contaminated material from this delineated site. Although one cannot completely exclude the possibility that contaminated material is present sub surface, the results of this investigation did not find any evidence of such.

#### 7.4.4 RISK OF EXPOSURE

This investigation did not find any evidence of contaminated material within the delineated spoil area. Although the presence of sub-surface contaminated material cannot be excluded, the risk of current and future exposure is likely to be LOW, due to the zoning of the property (open space 3).

#### 7.4.5 REHABILITATION AND REMEDIAL ACTIONS.

Although no evidence of contaminated material was found as part of this investigation, the western portion of the erosion gulley remains and head cut erosion will continue between the filled area and the remaining gulley. Alien vegetation (mostly sedges) have also begun to establish in the portions of the erosion gulley that have already been filled. The following remediation is thus recommended.

- Removal of all invasive vegetation from the partially rehabilitated section of the gulley.
- Flattening of the remaining few topsoil heaps above the gulley.
- Installation of a gabion at the lower end of the remaining erosion gulley.
- Filling of the remaining 36m of erosion gulley with subsoil and a 150mm layer of topsoil from a lawful source.
- Fencing of this area to prevent access for further dumping of material.

These actions should be undertaken within 6 months from the date that this response report is approved by the department. GGR should provide the Department with records of these remedial actions, once they are complete.



### 7.4.6 CONCLUSION

It is concluded that it is likely that the asbestos removed by Cape Cladding Contractors on 01 September 2018 and disposed of at the Enviroserve Aloes Hazardous Waste Facility on 19 September 2018 constitutes the complete removal of the unlawfully disposed material subject to the Departments Directive. Due to the Low risk of exposure and high confidence that all contaminated material has been removed, the potential impact on the receiving environment is also considered to be low and no further investigation or monitoring is deemed necessary.

## 8. ENVIRONMENTAL IMPACTS OF NON COMPLIANCE

The table below highlights the impacts of non and partial compliance identified in this audit.

**Table 6:** Summary of Environmental Impact of non and partial compliance items.

Nature	Status	Significance <sup>3</sup>	Mitigation
Establishment of Anti-Poaching training camp.	Positive	High	None
Establishment of Vegetable Garden outside of reserve fences.	Positive	Medium	None
Establishment of Laundry and store adjacent to Kwena Lodge.	Negative	Low	Subdivision of this footprint out of open space. Obtain comment from DEA&DP and Cape Nature.
Annual Audit requirements	Negative	Medium	Align condition with the requirements of the 2014 regulations (as amended).
Alien plants in landscaping	Neutral	Neutral	Remove the single Agave sp at Lehele lodge.
Establishment of tented staff accommodation	Positive	Low	Obtain comment from Cape Nature and DEA&DP. Obtain comment from Mossel Bay Municipality re any local requirements for tented structures.

### 8.1 ANTI-POACHING TRAINING FACILITY

The anti-poaching training facility was established as part of the Gondwana Conservation Foundation's (GCF) initiatives. GCF have established this facility and sponsored the training of field rangers and anti poaching teams to ensure the protection of Rhino on GGR and beyond.

The initiative ran its first training course in February 2017. The first course trained eight local general workers in the field of counter insurgency. This course offered skills to individuals on fence maintenance teams to enable them to provide valuable input and assistance to anti poaching units during their day-to-day patrolling of protected areas.

<sup>3</sup> This includes significance from both an environmental and social perspective.

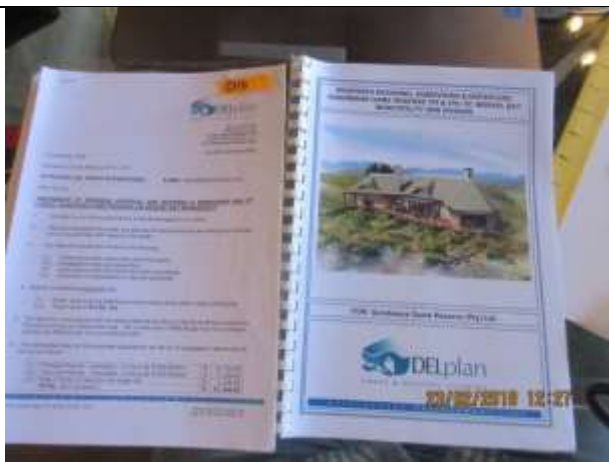
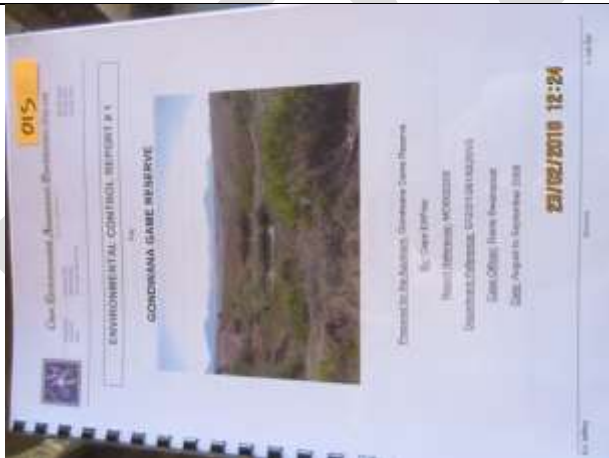
A five-week Security Ranger Program was undertaken in March 2017 where eight candidates working in private and public parks attended. This training provided these individuals with the necessary qualifications and skills to be legal and competent security rangers in protected areas and game reserves.

Considering the national importance of Rhino conservation and anti-poaching efforts and that the fact that this facility (consisting of temporary tented structures) was constructed on highly disturbed fallow lands, it is submitted that the establishment of this facility has a high positive environmental impact on a local and reasonable scale.

## 9. SUPPORTING EVIDENCE OF COMPLIANCE

The following evidence is supplied to supplement the Audit findings. Please note that the for the sake of brevity, only snap shots of relevant sections of supporting documents are included in this section. Where available, the full documents are available from Cape EAPrac on request, should they be required.

### 9.1 GENEREAL AND ADMINISTRATIVE COMPLIANCE RECORDS.

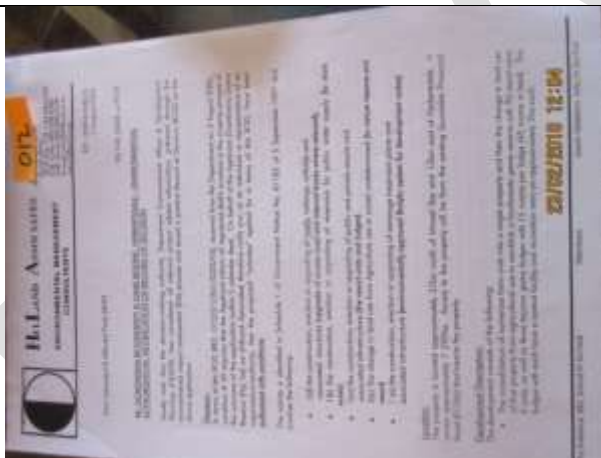
	<p><b>Figure 20:</b> Amendment of Rezoning and Sub-divisional Approval – 07/11/2018</p>
	<p><b>Figure 21:</b> The first environmental control report for the project, for the period August – September 2008.</p>



**Figure 22:** Letter from Hilland Associates to GGR confirming I&AP's were notified of the ROD on 07 August 2006



**Figure 23:** Subdivision, Rezoning and consolidation advert (10/02/2006)



**Figure 24:** Letter from Hilland Associates notifying I&AP's of ROD



**Figure 25:** Confirmation of the applicability of the ROD to tourism lodges.



**Figure 26:** Letter to DEA&DP querying applicability of lodge sizes authorised in ROD



**Figure 27:** General Authorisation in terms of the National Water Act - allowing the abstraction of surface water for the reserve.



**Figure 28:** Consent from Department of Agriculture in terms of Act 70 of 70



**Figure 29:** Confirmation to Mossel Bay Municipality that lodges are to be constructed as authorised.



**Figure 30:** DEA&DP approval of the amendments to the Mossel Bay Structure Plan.



**Figure 31:** Operational EMPr compiled by Hilland Associates in September 2007





Ref: HGR04/448/00  
12 September 2006

Dear Sir/Madam

**RE: INVITE TO SIT ON ENVIRONMENTAL LIAISON COMMITTEE FOR GONDWANA GAME RESERVE**

According to condition 21 of the Record of Decision (ROD) for Gondwana Game Reserve the developer is responsible for setting up an Environmental Liaison Committee (ELC) to assist in environmental monitoring the construction phase of the development. It would be greatly appreciated, if you (or an alternative representative from the company/organisation) would be able to sit on the committee.

The ROD was issued on the 31<sup>st</sup> of August 2006 and a construction phase environmental management plan subsequently developed and submitted to the Department of Environmental Affairs and Development planning for approval.

The site was handed over to the main contractor (OTR construction). They are due to commence with site establishment and construction.

The initial ELC meeting is therefore scheduled to take place on **Tuesday the 27<sup>th</sup> of September at 10:00 on site.**

**Figure 32:** Invite to inception ELC meeting that took place on 27 September 2006

**MOSSEL BAY MUNICIPALITY / MOSSELBAAI MUNISIPALITEIT / UMASIPALA MOSSEL BAYI**

**BRANDPERMIT / FIRE PERMIT**

Permit # \_\_\_\_\_ Datum / Date \_\_\_\_\_

Aansoekster / Applicant \_\_\_\_\_

Plaas / Farm # \_\_\_\_\_

Plaasnaam / Farm name \_\_\_\_\_

Tydperk geldig / Period valid \_\_\_\_\_

Redde vir brand / Reason for burning \_\_\_\_\_

Brandinspektor, komsa # / Fire Inspector / contact # \_\_\_\_\_

• Hiermee word toestemming aan die aansoekster gegee om 'n beheerde brand te laat plaas op die plaas op die datum wat aangedui is. Hiermee word toestemming gegee aan die aansoekster om 'n beheerde brand te laat plaas op die plaas op die datum wat aangedui is. Hiermee word toestemming gegee aan die aansoekster om 'n beheerde brand te laat plaas op die plaas op die datum wat aangedui is.

• Al die voorwaardes wat aangedui is in die aansoekster en die aansoekster se aansoek moet aangegee word in die permit. Hier moet ook op die dag van die brand versigtigheid word. Hier moet ook op die dag van die brand versigtigheid word. Hier moet ook op die dag van die brand versigtigheid word.

• Die aansoekster aanvaar aanspreeklikheid vir enige skade wat as gevolg van die brand ontstaan. Hier moet ook op die dag van die brand versigtigheid word. Hier moet ook op die dag van die brand versigtigheid word. Hier moet ook op die dag van die brand versigtigheid word.

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Permit uitgegee deur / Permit issued by \_\_\_\_\_

Tyd / Time \_\_\_\_\_

Mosselbaai Branddiens  
MOSSELBAAI BRANDDIENS  
MOSSEL BAY FIRE AND RESCUE SERVICES  
MOSSEL BAY FIRE AND RESCUE SERVICES

**Figure 33:** Example of fire permit from Mossel Bay Municipality for ecological burning undertaken on GGR.

**GEORGE MUNICIPALITY LABORATORY SERVICES**  
**DRINKING WATER STANDARD**  
**CERTIFICATE OF ANALYSIS**  
 1-Feb-18

**GEORGE**  
 THE CITY OF ALBERTA

**GONDWANA GAME RESERVE (JOE ERASMUS)**

PS1:0102/2018

DETERMINAND	RISK	UNIT	SANS Limits	241:1:2011	PURIFIED WATER
<b>Physical and aesthetic requirements</b>					
Colour	Aesthetic	mg/L Pt-Co	≤15		5
Conductivity at 25 °C	Aesthetic	µS/cm	≤1750		148
Total Dissolved Solids	Aesthetic	mg/L	≤1000		961
Turbidity	Operational	NTU	≤1		
pH value at 25 °C	Aesthetic	NTU	≤5		
	Operational	pH units	6.5 to 8.5		6.64
<b>Chemical requirements - Heavy metals/trace elements</b>					
Nitrate as N	Acute Health - 1	mg/L	<11		
Phosphate as PO <sub>4</sub>	Acute Health - 1	mg/L	<0.02		30
Fluoride as F	Aesthetic	mg/L	<0.05		30
Ammonia as N	Chronic Health	mg/L	<1.8		0.45
Chloride as Cl	Aesthetic	mg/L	<1.3		
Calcium as Ca	Aesthetic	mg/L	<300		344
Magnesium as Mg	Aesthetic	mg/L	<300		17.02
		mg/L			18.05
<b>Chemical requirements - Micro-determinants</b>					
Copper as Cu	Chronic Health	µg/L	<200		
Iron as Fe	Chronic Health	µg/L	<2000		30
	Aesthetic	µg/L	<300		30
Manganese as Mn	Chronic Health	µg/L	<800		24
	Aesthetic	µg/L	<100		24
Aluminium as Al	Operational	µg/L	<300		0
<b>Other</b>					
Alkalinity (mg/L CaCO <sub>3</sub> )					24
Hardness Calcium (mg/L CaCO <sub>3</sub> )					44
Hardness Mg (mg/L CaCO <sub>3</sub> )					78
Hardness Total (mg/L CaCO <sub>3</sub> )					122
Total Phosphate					
Settleable Solids					
COD					
Total Suspended Solids (mg/L)					
<b>Microbiological</b>					
E. Coli or Faecal Coliforms	Acute Health - 1	Counts/100mL	Not Detected		0
Total Coliforms	Chronic Health	Counts/100mL	<100		0

Prepared By:

NP DANSTER

Senior Laboratory Technician

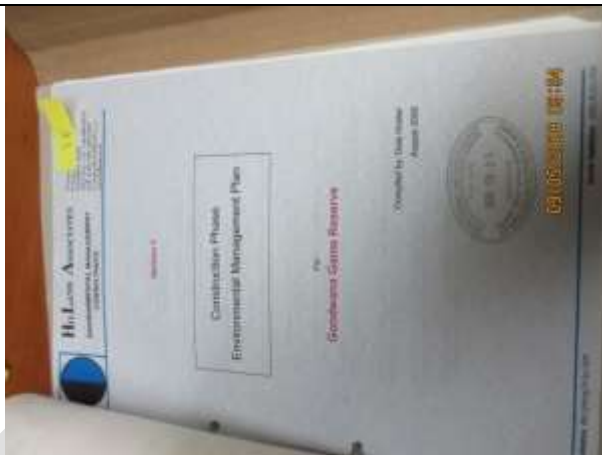
This certificate only relates to the services actually received and analysed for by the Municipal Water Purification Control Laboratory. It does not accept responsibility for any matter arising from further use of these results.

Reviewed By:


GH BREDEKAMP

Manager: Laboratory Services

**Figure 34:** Example of water quality results show water reticulated within GGR is of potable standards.



**Figure 35:** Copy of Construction Phase EMP, showing that the document was received by the Department on 25 August 2006.



**Cape Environmental Assessment Practitioners (Pty) Ltd**

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 Facsimile: (044) 873 3413  
 Web: www.cape-eap.co.za      88 York Street  
 PO Box 2070  
 George, 6520

**Environmental Control Officer Site Inspection**

**Checklist (PART 1- Site Clearing)**

The environmental requirements for the approval of the individual homes, follow a three phase approach (each stage requiring approval by the ECO) as follows:

1. Pre Site Clearing
2. Post - site clearing and establishment of temporary work boundary
3. Post - completion of construction and rehabilitation.

**PART 1 – PRE SITE CLEARING**

Erf Number: # 5

Housing Node: Milkwood

This checklist needs to be completed prior to the establishment of contractors on site.

Is the extent of the footprint and work area clearly defined?	Yes - GRS is demarcated clearly, out footprint not
Is there any vegetation of significance in the footprint area?	Yes - there is some vegetation
Is a plant rescue required?	Yes
If YES what is the estimated numbers and species to be rescued?	Unknown
Does the demarcated footprint meet the requirements in terms of the setback line?	Yes


Comments and Recommendations: demarcated clearly, vegetation, footprint  
& consider that all habitats, including present within footprint

Recommended for approval: ☒ YES    ☒ YES WITH CONDITIONS    ☐ NO

Signed: [Signature]

Date: 18/01/2009

**Figure 36:** Example of checklist undertaken prior to the construction of any of the resort zone II units.



**GRR Slope Analysis**



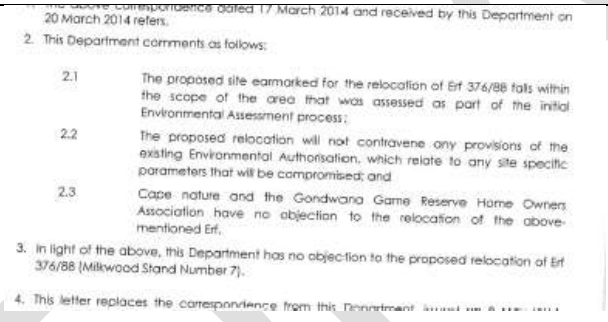

Legend

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Scale: 1:10,000  
 Date created: November 15, 2008  
 Western Cape  
 Environmental  
 Department

**Figure 37:** Slope analysis of GRR showing that all Resort units are situated outside of areas containing 1:4 slopes.



	<p><b>Figure 38:</b> Architectural Guidelines initially submitted for GGR</p>
	<p><b>Figure 39:</b> Updated Architectural Guidelines</p>
	<p><b>Figure 40:</b> Confirmation from DEA&amp;DP that there is no objection to the relocation of 376/88.</p>
	<p><b>Figure 41:</b> Storage reservoirs present within GGR.</p>



**Figure 42:** Aerial Photograph of the reserve dated 22 November 2006 showing that construction of civil services had not yet commenced.



**Figure 43:** Conservation and Biodiversity Management Plan developed for Gondwana Game Reserve




**Figure 44:** Wildlife Management Plan compiled by GGR

## 9.2 LEHELE LODGE

	<p><b>Figure 45:</b> Showing Pool area and decking on Lehele lodge. These amenities constitute the closest structures to the previous fynbos areas. This pool area is set back approximately 38m from the fynbos areas.</p>
	<p><b>Figure 46:</b> Showing separation of waste at source next to offices at Lehele lodge.</p>
	<p><b>Figure 47:</b> Showing Temporary office structures (wendy houses) placed adjacent to Lehele Lodge.</p>
	<p><b>Figure 48:</b> Showing indigenous landscaping adjacent to Lehele Lodge</p>




	<p><b>Figure 49:</b> Showing parking area at lehele lodge</p>
	<p><b>Figure 50:</b> Showing Indigenous landscaping around the parking area at Lehele Lodge</p>
	<p><b>Figure 51:</b> Energy efficient LED lighting at Lehele lodge</p>
	<p><b>Figure 52:</b> Energy efficient CF lighting at Kwena Lodge</p>

	<p><b>Figure 53:</b> Showing maintained grass area between Lehele lodge and Fynbos areas.</p>
	<p><b>Figure 54:</b> Refuge room at Lehele Lodge showing separation of general refuse and recyclables by means of coloured bags</p>
	<p><b>Figure 55:</b> Showing fat trap outside kitchen at Lehele Lodge</p>
	<p><b>Figure 56:</b> Footpath between parking area and Lehele Lodge</p>




	<p><b>Figure 57:</b> <i>Agave attenuata</i> planted outside Lehele Lodge.</p>
	<p><b>Figure 58:</b> Showing dual flush toilets installed at Lehele lodge.</p>

### 9.3 KWENA LODGE

	<p><b>Figure 59:</b> Extract from approved building plans for Kwena Lodge</p>
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	<p><b>Figure 60:</b> Extract from approved building plans for Kwena Lodge showing building sizes</p>
	<p><b>Figure 61:</b> Extract from approved building plans for Kwena Lodge</p>
	<p><b>Figure 62:</b> Extract from approved building plans for Kwena Lodge</p>
	<p><b>Figure 63:</b> Extract from approved building plans for Kwena Lodge</p>



	<p><b>Figure 64:</b> Showing access road to Kwena lodge, with locally occurring indigenous landscaping on the verges.</p>
	<p><b>Figure 65:</b> Showing external firefighting equipment at Kwena Lodge. Condition 19(3) of the EA must be amended to include this legal requirement.</p>
	<p><b>Figure 66:</b> Overview of Kwena lodge showing the nearly completed invasive vegetation removal in this previously heavily infested area.</p>

## 9.4 WORKSHOP / STAFF HOUSING AREA



 <p>A photograph showing a workshop building with a large open bay door. To the left, there are green waste bins. In front of the building, a small yellow and black fire-fighting bakkie is parked. A solar water heater is visible on the roof. The ground is dirt. A timestamp '25/02/2016 14:37' is visible in the bottom right corner.</p>	<p><b>Figure 67:</b> Overview of workshop area with waste separation, Solar water heaters and fire-fighting bakkie.</p>
 <p>A photograph showing three large, horizontal, cylindrical metal fuel tanks mounted on a metal frame. They are situated in an open, grassy area with some trees in the background. A timestamp '25/02/2016 14:37' is visible in the bottom right corner.</p>	<p><b>Figure 68:</b> Showing unbanded fuel storage within the workshop area. These tanks still remain from previous farming activities prior to the establishment of GGR.</p>
 <p>A photograph showing a long, low-profile tent structure with a white canvas roof and walls, supported by wooden poles. It is situated on a grassy area with trees and hills in the background. A timestamp '25/02/2016 14:37' is visible in the bottom right corner.</p>	<p><b>Figure 69:</b> Showing tented staff accommodation adjacent to the workshop area.</p>
 <p>A photograph showing a permanent staff accommodation building with a grey roof and white walls. Several solar water heaters are mounted on the roof. The building is surrounded by a grassy area and a fence. Hills are visible in the background. A timestamp '25/02/2016 14:37' is visible in the bottom right corner.</p>	<p><b>Figure 70:</b> Showing permanent staff accommodation with solar water heaters in compliance with EA.</p>

## 9.5 ULUBISI LODGE<sup>4</sup>


	<p><b>Figure 71:</b> Showing access gate to Ulubisi Lodge</p>
	<p><b>Figure 72:</b> Showing Solar Panel at Ulubisi Gate Entrance</p>
	<p><b>Figure 73:</b> Showing perimeter fence for Ulubisi Lodge</p>



<sup>4</sup> This lodge was authorised via a separate environmental authorisation.




 A photograph showing the Ulubisi Lodge, a large building with a thatched roof, situated in a grassy field with mountains in the background.	<p><b>Figure 74:</b> Ulubisi Lodge overview</p>
 A photograph showing a dirt access track leading towards the Ulubisi Lodge, flanked by trees and shrubs.	<p><b>Figure 75:</b> Showing access track to Ulubisi Lodge</p>

## 9.6 RED ROCKS HOUSING AREA

 A photograph showing a dirt access track leading towards the Red Rocks Housing Area, flanked by trees and shrubs.	<p><b>Figure 76:</b> Showing access track to Red Rocks Housing Area</p>
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	<p><b>Figure 77:</b> Showing young stand of invasive species at Red Rocks Housing Area</p>
	<p><b>Figure 78:</b> View towards previously disturbed pastures at Red Rocks housing area</p>

## 9.7 MILKWOOD HOUSING AREA



	<p><b>Figure 79:</b> View towards Milkwood housing area from the main access road</p>
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	<p><b>Figure 80:</b> Completed house, showing indigenous waterwise landscaping at the Milkwood housing Area</p>
	<p><b>Figure 81:</b> Overview of 3 completed houses in the Milkwood</p>
	<p><b>Figure 82:</b> Historical pastures within the Milkwood housing area in an advanced stage of rehabilitation</p>


## 9.8 ANTI POACHING TRAINING FACILITY

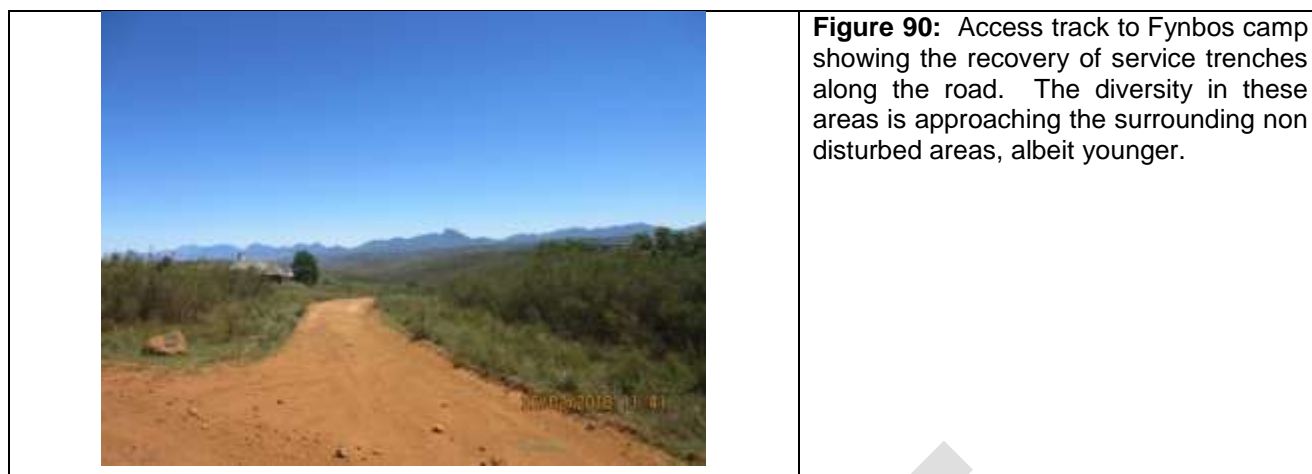
	<p><b>Figure 83:</b> Entrance to anti-poaching training facility</p>
	<p><b>Figure 84:</b> Access track to anti-poaching training facility</p>
	<p><b>Figure 85:</b> Dense invasive vegetation surrounding the Anti Poaching training facility</p>
	<p><b>Figure 86:</b> Water to anti-poaching training facility provided by HDPE pipe laid on surface.</p>



	<p><b>Figure 87:</b> Tented accommodation provided at the anti-poaching training facility.</p>
	<p><b>Figure 88:</b> Tented classroom and mess at the anti-poaching training facility.</p>

## 9.9 FYNBOS CAMP

	<p><b>Figure 89:</b> Two of the completed houses in Fynbos Camp showing setback from the historic fynbos areas as well as the indigenous landscaping surrounding the unit.</p>
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## 10. RECOMMENDED ACTIONS

The following actions are recommended as a result of the findings of this Audit.

**Table 7:** Recommended Actions

Recommended Action	Responsible Party	Timing
Remove single Agave plant at Lehele lodge	GGR	Within 30 days of approval of this audit report.
Install bunding around the diesel tanks and pump at the workshop area	GGR	Within 6 Months of approval of this audit report.
The footprint of the laundry/store and carport adjacent to Kwena Lodge should be rezoned out of Open Space. It is recommended that GGR rezone the footprint of this building as is required in condition 17. In compliance with condition 16 of the EA, comment must be obtained from both Cape Nature and DEA&DP before effecting this rezoning.	GGR	Within 1 Year of approval of this audit report.
GGR to initiate a disposal register to keep record of refuge desposal from the reserve.	GGR	Within 3 Months of approval of this audit report.
Apply for an amendment in terms of regulation 30 for amendment of conditions 12, 19(1) and 19(3)	GG	Within six months of approval of this audit report.
Obtain retrospective comment from Cape Nature and DEA&DP for all structures outlined in section 7.2 of this report	GGR	Within 6 Months of approval of this audit report.
Installation of water metres and maintenance of monthly water abstraction registers at all abstraction points.	GGR	Within 6 Months of approval of this audit report.
Confirmation of approval of CEMP and OEMP from DEA&DP.	DEA&DP	Within 90 days of approval of this audit report.
Relocation of Staff parking carport	GGR	Within 6 Months of approval of this report

Recommended Action	Responsible Party	Timing
at Lehele lodge (this should be moved to within the resort zone 1 erf approximately 33m east of its current position.		

## 11. CONCLUSION

The activities at the Gondwana Game Reserve development were in general found to be compliant with all major conditions and management outcomes as set by its requisite Environmental Authorisation (EA) and Construction Environmental Management Programme (EMPr). The findings of this draft audit show an overall high level of compliance on both the primary and secondary compliance aspects associated with the development.

Due to the extended time period between the Authorisation of this development and this first audit, there are many uncertainties and gaps of knowledge in the information available to effectively audit compliance. This draft audit is therefore submitted with a moderate – high level of confidence. In order to improve the level of confidence of this draft audit and in compliance with the requirements detailed in the regulations, this report has been provided to the identified key stakeholders for a 30 day review and comment period. On completion of this period, this draft report will be updated and submitted to DEA&DP for consideration. The action items referred to in this audit report should be undertaken by GGR within the specified timeframes.

## 12. EAP DECLARATION

I, **Dale Holder** on behalf of *Cape EAPrac* as the appointed environmental assessment practitioner ("EAP") hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that I:

- in terms of the general requirement to be independent:
  - other than fair remuneration for work performed/to be performed in terms of this application, have no business, financial, personal or other interest in the activity or application and that there are no circumstances that may compromise my objectivity; or
  - am not independent, but another EAP that meets the general requirements set out in Regulation 13 have been appointed to review my work (Note: a declaration by the review EAP must be submitted);
- in terms of the remainder of the general requirements for an EAP, am fully aware of and meet all of the requirements and that failure to comply with any the requirements may result in disqualification;
- have disclosed/will disclose, to the applicant, the specialist (if any), the Department and interested and affected parties, all material information that have or may have the potential to influence the decision of the Department or the objectivity of any report, plan or document prepared or to be prepared as part of the application;
- have ensured/will ensure that information containing all relevant facts in respect of the application was/will be distributed or was/will be made available to interested and affected parties and the public and that participation by interested and affected parties was/will be facilitated in such a manner that all interested and affected parties were/will be provided with a reasonable opportunity to participate and to provide comments;
- have ensured/will ensure that the comments of all interested and affected parties were/will be considered, recorded and submitted to the Department in respect of the application;
- have ensured/will ensure the inclusion of inputs and recommendations from the specialist reports in respect of the application, where relevant;
- have kept/will keep a register of all interested and affected parties that participate/d in the public participation process; and
- am aware that a false declaration is an offence in terms of regulation 48 of the 2014 NEMA EIA Regulations.



Signature of the environmental assessment practitioner:

Name of company: **Cape Environmental Assessment Practitioners (Cape EAPrac)**

Date: **12 November 2018**