Western Cape Government
Environmental Affairs and Development Planning

Request for the relevant Competent Authority to define or adopt a Maintenance Management Plan for a watercourse in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), Environmental Impact Assessment Regulations, 2014 (as amended).

		(For official use only)
File Reference Number:		
Date Received by Department:		
Date Received by Component:		
Form Duly Signed and Dated:		Yes No

PROJECT TITLE

The Proponent/Owner **[Plattner Golf (PtyL Ltd]** intends to do maintenance work on a portion of their existing northern boundary security fence, where it crosses the Modder River south of the R404.

The existing security boundary fence consists of a combination of gabions and reno mattresses as supporting structures, with numerous fence pole footings, that support the suspended fence, electrical fence and security camera equipment.

Over time and especially as a result of high rainfall / flood events, this exposed portion of the fence with its supporting structures (gabions / reno mattresses) running through the Modder River, gets damaged which jeopardizes the Estate security.

When debris washes down the river during floods, the organic load builds up against the fence and topples it over when the weight of the material gets too heavy for the fence to remain upright. Subsequently the supporting gabions/reno mattresses are broken up as well with some gabions having broken up and washed downstream

The Proponent intends to remove the majority of the existing stabilising structures and re-instate these in a like-for-like manner albeit with an improved design to ensure a more sustainable fence. Engineering input has been obtained to ensure that the design ultimately reduces the need for maintenance.

The repairs as part of the maintenance exercise, will have less fence posts i.e. longer spanning between fence posts and it will have 'sacrificial' fence panels along the bottom, to allow debris to pass through the (sacrificial) panels, without compromising the integrity of the supporting gabions/reno mattresses, fence posts and fence itself.

The proposed design is such that the top fence panels (that supports the security electric fence / camera hardware etc) will remains safe and undamaged with long-term repairs and maintenance likely to be limited to only fixing/replacement of the bottom (sacrificial) fence panels. This will ensure that even if bottom (sacrificial) panels are damaged, the top panels will remain in place ensuring that security measures (electrical fencing / cameras) continue to operate uninterruptedly (currently when the fence is washed away, all of the security measures are washed away with it, leaving the crossing over the Modder River highly exposed.

Measured from the western bank of the Modder River to the eastern bank, the specific section of the fence needing repairs is across a distance of approximately 75m (maximum 100m inclusive of work area). The fence is constructed on Erf 3602 (Fancourt property) and Erf 3607 which is the R404 road reserve (managing agent being Provincial Roads/Transport Department).

Figure 1: Estimated distance of the fence section to be replaced under this MMP.

The Applicant intends to replace the fence along the same alignment, on the same footprint and not increasing its capacity. The repairs and maintenance can therefore be considered in terms of a Maintenance Management Plan (MMP).

The repair and maintenance is submitted in terms of the following methodology:

- Creating a **temporary access** down the western bank of the river (between the R404 bridge and security fence) inclusive of a **temporary laydown area** for materials (+/-150m^2) (**Fig 2**) indicated by the BLUE polygon;
    - This area consists of mowed lawn that is well-maintained and without remnant natural vegetation;
    - Topsoil to be stacked separately if there is a need to remove such, to allow for coverage and restoration of groundcover once work is complete;

Figure 2: Access and temporary laydown/work area West of Modder River (indicated in BLUE).

- Removal of the surface fence structure from on-top the support structure (gabions

/ reno mattresses) (**Fig 3**) to enable access to the stabilising structures below;

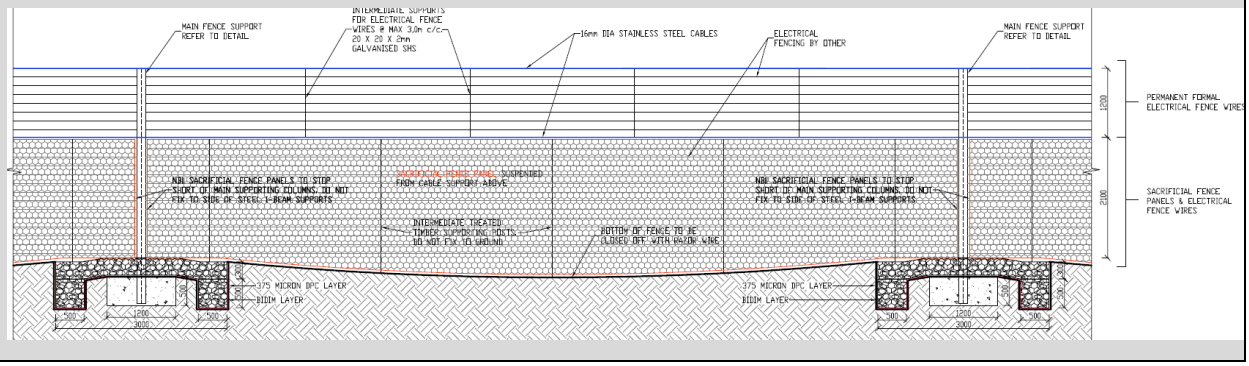
Figure 3: Indication of top structures to be removed.

- Removal of material and existing gabions / reno mattresses and fill materials, as well as vegetation that has accumulated around existing infrastructure (**Fig 4**);
    - Materials may only be stockpiled in the temporary site camp on the western side of the R404 bridge;
    - Western section of the supporting structures to be removed and then reinstated completely;
    - Eastern section of the supporting structures to be left in-situ where necessary, but lowered to riverbed level;
- Vegetation removal limited to the working area along the riverbed;

Figure 4: Indication of stabilising materials to be removed and lowered to create a more natural watercourse bed.

- Backfill and reinstatement of gabions / reno mattresses in the same position, along the same alignment, with the same footprint albeit 'smaller' and lowered to be level with the riverbed to reduce its impact of being an obstruction along the riverbed;
    - Where possible, material from the existing gabions/reno mattresses to be re-used;
    - The current design has all of the stabilising structures extend/elevated above the natural riverbed – this causes obstruction and result in channelisation of water through lower lying areas along the gabions causing unwanted erosion;
- Installation of new, improved fence design with 'sacrificial' panels along the bottom, on-top of the re-instated support structures;
- Reshape and rehabilitate the work around along and downstream in the riverbed where erosion has occurred as a result of the existing fence structure;
- Remove all excess material from the site camp and dispose of at the Municipal landfill before rehabilitating of the temporary access and laydown area/site camp.

Refer to the Appendix containing the proposed Engineering Design indicating the proposed fence in its re-designed form (extract below):



A. SCOPE AND IMPORTANT INFORMATION

1) This document is to be used to ensure that the request for adopting or defining a Maintenance Management Plan (MMP) in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), Environmental Impact Assessment (EIA) Regulations, 2014 (as amended) is undertaken to the sufficient standard and requirements as defined by the competent authority, the Department of Environmental Affairs and Development Planning of the Western Cape Government (henceforth the Department). It is advised that the determination of applicability regarding the scale of the proposed maintenance/management activity(ies) be undertaken through a pre-application consultation with the Department.

2) The geographical scope of the MMP is limited to watercourses as defined in the EIA Regulations, 2014(as amended). The document does not relate to coastal activities or activities to be undertaken in an estuary.

3) The use of this document for the development of a MMP for a watercourse **will only** be considered when the proposed maintenance activities constitute any one of the following listed activities identified in terms of the NEMA EIA Regulations, 2014 (as amended):

*EIA Regulations **Listing Notice 1** of 2014 (as amended)*

- **Activity 19, Listing Notice 1: The infilling or depositing of any material of more than 10 cubic meters into, or the dredging, excavation, removal or moving of soil, sand, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse; but excluding where such infilling, depositing, dredging, excavation, removal or moving-**

  ~~(a) will occur behind a development setback;~~

  (b) is for maintenance purposes undertaken in accordance with a maintenance management plan;

  ~~(c) falls within the ambit of activity 21 in this Notice, in which case that activity applies;~~

  (N.B. Points (d) and (e) does not apply as these activities fall within the coastal zone)

- **Activity 27, Listing Notice 1: The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for-**

  i. The undertaking of a linear activity; or

  ii. Maintenance purposes undertaken in accordance with a MMP.

EIA Regulations Listing Notice 2 of 2014 (as amended)

- ~~Activity 15, Listing Notice 2: The clearance of an area of 20 hectares or more of indigenous vegetation, excluding where such clearance of indigenous vegetation is required for-~~

  ~~I. The undertaking of a linear activity; or~~

  ~~II. Maintenance purposes undertaken in accordance with a MMP.~~

- ~~Activity 24, Listing Notice 2: The extraction or removal of peat or peat soils, including the disturbance of vegetation or soils in anticipation of the extraction or removal of~~

~~peat or peat soils, but excluding where such extraction or removal is for the rehabilitation of wetlands in accordance with a MMP.~~

*EIA Regulations **Listing Notice 3** of 2014 (as amended)*

- **Activity 12, Listing Notice 3: The clearance of an area of 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 MMP.**
  i. Western Cape
  i. **Within any critically endangered or endangered ecosystem listed in terms of section 52 of the 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;
  iv. On land, where, at the time of the coming into effect of this Notice or thereafter such land was zoned open space, conservation or had an equivalent zoning; or
  v. ~~On land designated for protection or conservation purposes in an Environmental Management Framework adopted in the prescribed manner, or a Spatial Development Framework adopted by the MEC or Minister.~~
  (NB. Point iii does not apply as this activity falls within the coastal zone)

4) In deciding the request, the competent authority may define conditions related to auditing compliance with the MMP; monitoring requirements; reporting requirements, review; updating and amending the document and period for which the MMP is defined/adopted.

5) The purpose of the MMP is to maintain both **man-made** and ecological infrastructure in a manner that either **improves the current state** of, and/or **reduces the negative impacts** on a watercourse to ensure that **ecosystems services are preserved/improved** and to **prevent further deterioration** of the watercourse.

6) Notwithstanding the MMP possibly being defined or adopted by the Competent Authority, any other applicable statutory requirement must still be complied with (e.g. any obligations under the National Water Act, 1998 (Act 36 of 1998) or the Conservation of Agricultural Resources Act, 1983 (Act 43 of 1983) – Not applicable to this application.

7) The proponent must note that a MMP for a watercourse **must** be undertaken through consultation with the **Department of Water and Sanitation** and/or the relevant **Catchment Management Agency** (responsible water authority). This is to ensure compliance in terms of a Permissible Water Use as set out in the National Water Act, 1998 (Act No. 36 of 1998). It is recommended that this process for authorisation in terms of the National Water Act be clarified prior to the drafting and submission of the MMP. ***It is submitted that Confluent Consulting is responsible for engagement with the BOCMA and have commenced with a process of evaluating the Risk Assessment. A joint site inspection was undertaken on 17 July 2025. BOCMA has been approached for formal comment in response to this Draft MMP.***

8) The development of this document has been done in such a way so as to meet the requirements of both this Department as the competent authority in terms of the NEMA EIA Regulations, 2014 (as amended), as well as the requirements of the delegated water authority, regarding general authorisation considerations for sections 21(c) and (i) of the National Water Act, 1998 (Act No. 36 of 1998), to ensure alignment between the two authorities when defining or adopting the MMP.

9) In situations where a Water Use Licence Application (WULA) is required by the water authority regarding the proposed activities within a MMP, this will not prevent the proponent from submitting a request for a MMP to be defined or adopted by the Department.

10) Unless protected by law, all information contained in, and attached to this document, shall become public information on receipt by the competent authority.

11) A duly dated and originally signed copy of this document together with one hard copy and one electronic copy of the MMP must be posted, to the Department at the postal address given below, or delivered to the Registry Office of the Department. ***Final copy of the MMP for submission to be signed by the Applicant.***

12) A copy of the final defined/adopted MMP and cover letter **must** be submitted to the responsible water authority.

13) NOTE: Adopting or defining the MMP does not absolve the proponent from complying with any applicable legislation or the general "duty of care" set out in Section 28(1) of the NEMA that states, "*Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment*." (Note: When interpreting this "duty of care" responsibility, cognisance must be taken of the national environmental management principles contained in Section 2 of the NEMA.

14) NOTE: This document can be used as a template to assist in the information required and is to be filled out in full. The Department reserves the right to request any additional information during the initial development and submission of the draft MMP.

15) NOTE: The Department reserves the right to not adopt the MMP and require that an application be submitted to obtain Environmental Authorisation for the respective activities. Furthermore, consideration for the review should also be aligned to the periodic reviews of the General Authorisation for sections 21 (c) and (i) of the National Water Act, 1998 (Act No. 36 of 1998) to ensure continued alignment and compliance.

B. MAINTENANCE MANAGEMENT PRINCIPLES

1) The following are overarching principles to be used by landowners and managers when considering the development and implementation of a MMP:

    a. The anticipation and prevention of negative impacts and risks, then minimisation, rehabilitation or 'repair', where a sequence of possible mitigation measures to avoid, minimize, rehabilitate and/or remedy negative impacts is explicitly considered;
        i. **The Applicant must appoint an Environmental Control Officer (ECO) to oversee the repair and maintenance activities from start-finish, including rehabilitation;**
        ii. **The Contractor must be inducted by the ECO to ensure that he/she is aware of the content and recommendations of the MMP;**
        iii. **Work must be undertaken by hand only;**
        iv. **No material may be stockpiled/kept outside of the designated site camp other than what is being removed/utilised on a specific day, for a specific task;**
        v. **Work must be undertaken during periods of low-flow.**
    b. Avoid and reduce unnecessary maintenance;
        i. **The design proposed by the Consulting Engineer specifically allows for the introduction of 'sacrificial' panels along the bottom section of the fence line;**
        ii. **The purpose of this improved design is to allow only the bottom of the fence to 'give way' in the event of a flood, or debris build-up, whilst ensuring that the top half of the fence which supports the electrical fence and security camera system, is less likely to be damaged;**
        iii. **In addition, the design proposed ensures that the gabions/reno mattresses that current extends above the riverbed, is reinstated at a lower level i.e. level with the riverbed, to reduce obstruction and unwanted channelisation into the downstream wetland;**
        iv. **This design is considered much more sustainable and will reduce overall maintenance requirements;**
        v. **The Aquatic Specialist also confirmed that this design will improve the environmental conditions of the watercourse at this location.**
    c. Maintenance and management of a watercourse must be informed by the condition of the physical and ecological processes that drive and maintain aquatic ecosystems within a catchment, relative to the desired state of the affected system;
        i. **Confluent Consulting (Dr James Dabrowski) conducted specialist investigation of the site and considered the proposed design in conjunction with the Consulting Engineer to ensure minimal negative impact whilst optimising improved ecological conditions at this location;**
    d. Management actions must aim to prevent further deterioration to the condition of affected watercourses and, overall, be guided by a general commitment to improving and maintaining ecological infrastructure for the delivery of ecosystem services;
        i. **Confluent Consulting (Dr James Dabrowski) conducted specialist investigation of the site and considered the proposed design in conjunction with the Consulting Engineer to ensure minimal negative impact whilst optimising improved ecological conditions at this location;**

e. Managers and organs of state must identify, address and, where feasible, eliminate the factors that necessitate intrusive, environmentally-damaging maintenance; and
f. A process of continuous management improvement be applied, namely Planning; Implementing; Checking (monitoring, auditing, determine corrective action) and Acting (management review).
    i. **The Applicant must appoint an ECO prior to any site establishment or work to be undertaken;**
    ii. **The ECO must conduct regular site inspections (minimum at weekly intervals) fur the duration of the repair/maintenance activities until such time as the work is completed and the site and camp site rehabilitated;**
    iii. **It is a recommendation of this MMP that an Aquatic Specialist be appointed to conduct a site inspection prior to completion to ensure that the rehabilitation/final works in the watercourse is done to a satisfactory level.**

2) The following table provides a simple overview for the determination of the need for a MMP:

	Question	**If the answer to any of the questions is YES, then a MMP may be applicable.**
2.1	Is there a watercourse on or adjacent to the property?	YES
2.2	Has there been a history of flood damage or vandalism to the existing infrastructure or watercourse – erosion and/or sedimentation?	YES
2.3	Is there infrastructure or any community at risk of being damaged by flooding?	YES
2.4	Is the current design of infrastructure considered inadequate in terms of managing the risk of flooding, erosion and/or sedimentation?	YES
2.5	Would you consider an improved design to existing infrastructure to reduce maintenance needs?	YES
2.6	Are there specific incidences where the watercourse is obstructed or blockages occur that alter the flow of the river during floods?	YES
2.7	Is there an existing obstruction in the watercourse that has changed the flow of the river under normal conditions?	YES
2.8	Is there a marked increase in the rate of erosion/sedimentation being experienced which threatens operations and assets?	YES
2.9	Is there a presence of alien or bush encroachment vegetation within the watercourse and/or the presence of woody debris after flooding?	YES

3) It is important to consider that the type of maintenance required will impact on the level of assessment needed in terms of the impact the activity will have on the system and how best to mitigate the impact. Types of maintenance can broadly be classified in the following categories, with recognition that maintenance activities vary across the rural and urban context:

Maintenance Category	**Types of maintenance activities (examples only)**
~~**Category A:**~~	• ~~Clearing sediment or placing sediment at:~~

~~Sediment removal as a result of deposition or sediment deposition as a result of erosion~~	~~o Pump hole/trench~~ ~~o Return flow (irrigation)~~ ~~o Off-take weir~~ ~~o Stormwater outfall~~ ~~o Detention/retention ponds~~ ~~o Canalized urban rivers~~ ~~o Bridges, culverts and drifts~~ ~~• Prevent formation of islands in the channel of the river~~ ~~• Dredging of in-stream dams~~
Category B: Emergency repairs – urgent action required to manage risk and damage to assets	• Repair to erosion of river bank or servicing infrastructure (e.g. pipelines/roads/**fence**) • Removal of material built up as a result of flooding/sedimentation and increasing risk to infrastructure • Address damage or replacement of infrastructure (e.g. bridge, pipeline, pump house, **fence**) • Manage the condition of flood protection berms, and existing structures such as gabions, canalized and stormwater systems
~~**Category C:**~~ ~~Managing alien invasive and bush encroachment plant species~~	~~• Clearing of alien invasive vegetation out of a watercourse to reduce maintenance requirements as they relate to erosion and sedimentation~~ ~~• Management of indigenous species categorized as bush encroachment, to improve hydrological flow and reduce associated flooding impacts~~
~~**Category D:**~~ ~~Rehabilitation and restoration activities for maintaining ecological infrastructure~~	~~• Development and maintenance of ecological buffering systems to improve and/or restore functioning (e.g. wetlands and stormwater detention ponds)~~ ~~• Actively rehabilitating riparian zones through planting of locally indigenous species~~ ~~• Bank grading and movement/removal of berms and barriers to flow~~

4) The development of appropriate method statements to mitigate the impact of the maintenance needs, should be aligned within the framework of these considerations:

   a. Watercourses experience a natural process of sedimentation and erosion, with varying rates depending on the geomorphology and the integrity of the land-uses within the catchment;

   b. Manipulation of the watercourse results in increased erosion and/or deposition being experienced further downstream, perpetuating greater need for manipulation and more drastic and costly maintenance interventions;

   c. Locally indigenous riparian and wetland vegetation assists in the stabilization of river banks through effective root structures, while contributing to improve in-stream habitat and water quality conditions;

   d. Invasive alien and bush encroachment vegetation significantly impacts on the functioning of a watercourse, often leading to increased flood associated

damage, with further implications and a reduction in water quality and availability;

e. Persons undertaking maintenance activities have a responsibility to ensure a sense of duty of care is applied as prescribed within NEMA Section 28(1).

5) It is recognized that within urban areas, sedimentation and erosion rates are significantly amplified as a result of development in urban areas and thus systems associated with watercourses in such areas can no longer be considered as 'natural'. In such a context, the drivers of such a process are often located outside the control of the landowner or responsible authority (i.e. Municipality). Therefore, the response taken to address the needs of a maintenance management plan for a watercourse within the urban environment may be limited in mitigating the requirement for maintenance to be undertaken.

DEFINITIONS

"Activity" means an activity identified in any notice published by the Minister or MEC in terms of section 24D(1)(a) of the Act as a listed activity or specified activity. Activity in this document refers to the activities as listed in Listing Notice 1, 2 and 3 of the Environmental Impact Assessment Regulations, 2014 (as amended).

"Diverting" as defined in the General Authorisation, in terms of section 39 of the National Water Act, 1998 (Act no 36 of 1998) for Water Uses as defined in Section 21(c) and 21(i) (GN. 509 of 26 August 2016), means to, in any manner, cause the instream flow of water to be rerouted temporarily or permanently.

"Ecological Infrastructure" refers to naturally functioning ecosystems that deliver valuable services to people, such as water and climate regulation, soil formation and disaster risk reduction.

"Flood event" is the event where land is inundated by the overflowing of water from a river channel and where this event causes significant damage to infrastructure or results in watercourse erosion and/or sediment deposition.

"Flow-altering" as defined in the General Authorisation, in terms of section 39 of the National Water Act, 1998 (Act no 36 of 1998) for Water Uses as defined in Section 21(c) and 21(i) (GN. 509 of 26 August 2016), means to, in any manner, alter the instream flow route, speed or quantity of water temporarily or permanently.

"General Authorisation" in this document refers to the General Authorisation in terms of section 39 of the National Water Act, 1998 (Act no 36 of 1998) for Water Uses as defined in Section 21(c) or Section 21(i) (GN. 509 of 26 August 2016).

"Impeding" as defined in the General Authorisation, in terms of section 39 of the National Water Act, 1998 (Act no 36 of 1998) for Water Uses as defined in Section 21(c) and 21(i) (GN. 509 of 26 August 2016), means to, in any manner, hinder or obstruct the instream flow of water temporarily or permanently, but excludes the damming of flow so as to cause storage of water.

"Indigenous vegetation" refers to vegetation consisting of indigenous plant species occurring naturally in an area, regardless of the level of alien infestation and where the topsoil has not been lawfully disturbed during the preceding ten years.

"Maintenance" means actions performed to keep a structure or system functioning or in service on the same location, capacity and footprint.

"Maintenance Management Plan" means a management plan for maintenance purposes defined or adopted by the competent authority.

"**River Management Plans**" as defined in the General Authorisation, in terms of section 39 of the National Water Act, 1998 (Act no 36 of 1998) for Water Uses as defined in Section 21(c) and 21(i) (GN. 509 of 26 August 2016), any river management plan developed for the purposes of river or storm water management in any municipal/metropolitan area or described river section, river reach, entire river or sub quaternary catchment that considers the river in a catchment context.

"River reach", a length of river characterised by a particular channel pattern and channel morphology, resulting from a uniform set of local constraints on channel form. A river reach is typically hundreds of meters in length.

"Stretch" a section of watercourse, delineated between two or more mapped coordinates, within which proposed maintenance activities are to take place as guided by a MMP.

"Watercourse" means:

(a) a river or spring;
(b) a natural channel in which water flows regularly or intermittently;
(c) a wetland, lake or dam into which, or from which, water flows; and

any collection of water which the Minister may, by notice in the Gazette, declare to be a watercourse as defined in the National Water Act, 1998 (Act No. 36 of 1998); and a reference to a watercourse includes, where relevant, its bed and banks.

"Wetland" means, land which is transitional between terrestrial and aquatic systems where the water table is usually at or near the surface, or the land is periodically covered with shallow water, and which land in normal circumstances supports or would support vegetation typically adapted to life in saturated soil.

DEFINITIONS OF TERMS AND ACRONYMS

BOCMA	Breede-Oliftants Catchment Management Agency
DEADP	Department of Environmental Affairs & Development Planning
EAP	Environmental Assessment Practitioner
NEMA	National Environmental Management Act
NWA	National Water Act
SACNASP	South African Council for Natural Scientific Professions

C. REQUEST FOR THE COMPETENT AUTHORITY TO DEFINE OR ADOPT A MAINTENANCE MANAGEMENT PLAN FOR A WATERCOURSE IN TERMS OF THE NEMA, EIA REGULATIONS 2014 (AS AMENDED).

The following information must be submitted as part of the request for the competent authority to define or adopt the MMP:

1. PERSONAL DETAILS

Highlight the Departmental Sub-Region(s) in which the maintenance is to be undertaken. (mark the appropriate box with an 'X'). For Departmental details see Annexure A.

REGION 1 (City of Cape Town Metropolitan and West Coast District)	REGION 2 (Cape Winelands District, Overberg District)	REGION 3 (Eden & Central Karoo Districts)
☐	☐	√

Highlight the Departmental Region and District in which the intended application will fall		~~CAPE TOWN OFFICE (REGION 1)~~				**GEORGE REGIONAL OFFICE (REGION 3)**	
		~~City of Cape Town~~	~~Cape Winelands District~~			~~Central Karoo District~~	
		~~West Coast District~~	~~Overberg District~~			Garden Route District	
Duplicate this section where there is more than one Proponent							
1.	Name of Proponent:	Plattner Golf (Pty) Ltd					
	Contact person name (if other):	Joalitha van Zyl					
	Company/ Trading name State Department/Organ of State:						
	Company Registration Number:	1994/002617/07					
	Postal address & Postal code:	PO Box 2266, George			Code	6530	
	Contact numbers:	Tel.	+27(0)	Cell:	+27(0) 44-8040140		
	E-mail:	cfo@fancourt.co.za					
2.	Company of EAP/Specialists:	*Cape EAPrac (Pty) Ltd*					
	EAP / Candidate EAP / Specialist name:	Louise-Mari van Zyl					
	EAP / Specialists registration no:	2019/1444					
	Postal address & Postal code:	PO Box 2070, George			Code	6530	
	Contact numbers:	Tel.	+27(0) 44-8740365	Cell:	+27(0) 716034132		
	E-mail:	louise@cape-eaprac.co.za					
Duplicate this section where there is more than one Landowner							
3.	Name of landowner:	Same as Applicant					

	Name of contact person for landowner (if other):					
	Postal address & Postal code:				Code	
	Contact numbers:	Tel.	+27(0)	Cell:	+27(0)	
	E-mail:					
	Duplicate this section where the is more that one person in control of the land					
4.	Name of Person in control of the land:	Same as Applicant				
	Contact person for 'person in control of the land' (if other):					
	Postal address & Postal code:				Code :	
	Contact numbers:	Tel.	+27(0)	Cell:	+27(0)	
	E-mail:					
	Duplicate this section where there is more than one Municipal Jurisdiction					
5.	Municipality in whose area of jurisdiction the proposed activity will be undertaken:	George Municipality				
	Name of contact person:	Delia Power				
	Postal address & Postal code:	PO Box 19, George			Code	6530
	Contact numbers:	Tel.	+27(0)	Cell:	+27(0)	
	E-mail:	dpower@george.org.za				

DECLARATION [to be completed and signed for Final MMP submission]

THE PERSON THAT WILL BE UNDERTAKING THE MAINTENANCE

I ……., in my **personal capacity** or **duly authorised** (please circle the applicable option) by …… (name of legal entity) thereto hereby declare that I/we:

- Request the MMP to be adopted by the Competent Authority;
- Regard the information contained herein to be true and correct for this Maintenance Management Plan;
- Am fully aware of my responsibilities in terms of the National Environmental Management Act of 1998 ("NEMA") (Act No. 107 of 1998) and that, notwithstanding the adoption of this MMP, I/we shall comply with any other statutory requirement applicable, which may include, but not limited to the Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983), the National Water Act, 1998 (Act No. 36 of 1998) and the Environmental Impact Assessment Regulations, 2014 (as amended) ("EIA Regulations"), in terms of NEMA;
- Am fully aware that the proposed maintenance constitutes a listed activity in terms of the NEMA EIA Regulations, 2014 (as amended) and that an environmental assessment for environmental authorisation may be required for any other listed activities not included as part of this MMP;
- Acknowledge that any activity undertaken that does not form part of the defined and adopted MMP, will be subject to the Section 24(F) of NEMA and that appropriate enforcement and compliance requirements will follow;
- Shall undertake only those tasks described in the MMP, failing which environmental authorisation will be required, where applicable;
- Shall provide the competent authorities with access to all information at my disposal that is relevant to this request;
- Shall be responsible for any costs incurred in complying with environmental legislation;
- Hereby indemnify the government of the Republic, the competent authority and all its officers, agents and employees, from any liability arising out of, inter alia, any loss or damage to property or person as a consequence of undertaking this MMP; and
- Am aware that a false declaration is an offence in terms of Regulation 48(1)(a) GN No. R. 982 of 4 December 2014 (as amended).

Signature of the proponent: Date:

Name of institution/company:

2. BACKGROUND AND INTRODUCTION

Cape Environmental Assessment Practitioners (Pty) Ltd, hereafter referred to as *Cape EAPrac*, was appointed by **Plattner Golf (Pty) Ltd**, to compile a Maintenance Management Plan (MMP) for repair work necessary at a position along their existing security fence, where it traverses the Modder River.

The MMP is compiled and must be considered by the Competent Authority (Department of Environmental Affairs & Development Planning, George), in terms of the **National Environmental Management Act** (NEMA, 1998) and the **Environmental Regulations** (2014, as amended).

Considering the aquatic environment within which the repair and maintenance work must be conducted, Plattner Golf (Pty) Ltd also appointed **Confluent Consulting**, Dr James Dabrowski, who is a qualified, SACNASP registered aquatic specialist, to provide input and engage with the Breede-Olifants Catchment Management Agency (BOCMA) in terms of the applicability of the **National Water Act** (1998).

Maintenance management actions are presented in this plan along with other methods aimed at reducing damages associated with flooding, without causing excessive negative impact to the receiving environment.

BACKGROUND:
Flooding in the Modder River results in regular damage to the section of existing security fence at the point where it crosses the Modder River, causing a security risk to residents and visitors alike whilst the fence repairs are underway (fence holds the electric wires as well as digital camera surveillance equipment that all gets damaged when the fence collapses/washes away).

The Proponent consulted with a qualified engineer to assist them with an **improved design** that will achieve the **same outcome** (safety and security), but with a **lower risk** of long-term damages and maintenance requirements, **reducing maintenance** and **improving the ecological conditions** at this location.

The fence with its associated support structures (gabions and reno mattresses) will be re-instated in the **same position**, within the **same footprint**, **not exceeding the current capacity/extent** of the structure. The fence design itself has been improved to allow for **sacrificial (bottom) panels** that if damaged, will not compromise in the top panels that holds the electric wire and camera surveillance equipment, therefore ensuring that security monitoring and control is not interrupted whilst repairs may be necessary on the bottom sacrificial panels thereby **furthering sustainable practices** and **reducing and/or mitigating the need for maintenance**.

The site is located directly South of the R404, on the far North-Western edge of the Fancourt Golf Estate property boundary. The extent of the existing structure is approximately 100m in length, of which roughly 75m of fence/structures must be replaced/repaired, and it is situated directly downstream of the R404 bridge/pylons.

The **Proponent** will be responsible for ensuring compliance with the MMP once adopted. This MMP is compiled by a **registered environmental assessment practitioner (EAP),** based on a design by a **qualified and registered Engineer**, with input from a **SACNASP registered aquatic specialist**. It is a recommendation of this MMP that the maintenance work, as described in this MMP be done under supervision of a **suitably experienced environmental control officer (ECO)** and/or **suitably qualified aquatic specialist** to ensure compliance and record keeping.

Figure 5: Existing security fence crossing the Modder River south of R404 (Source: George GIS Viewer).

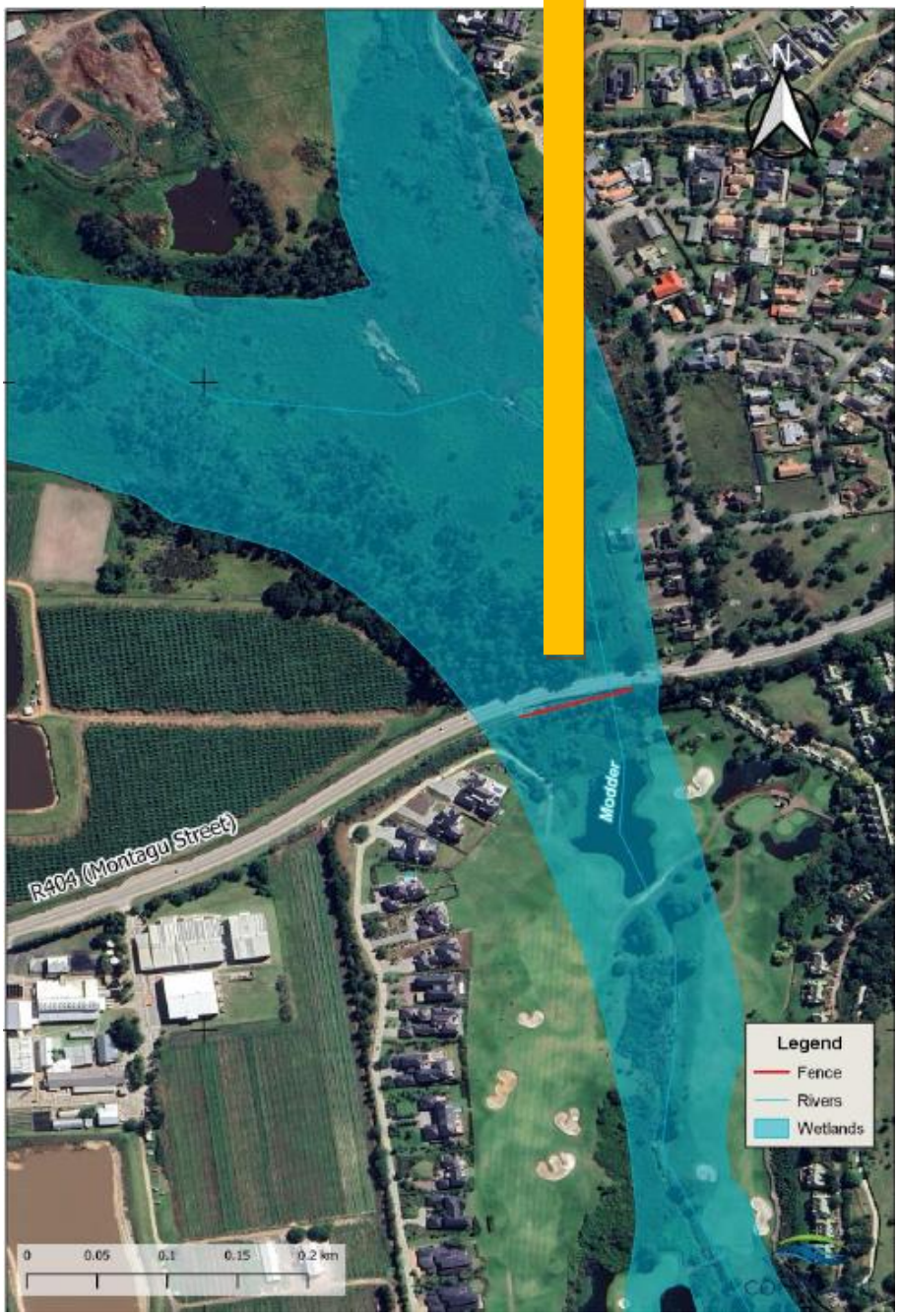


Figure 6: Location of the existing fence on the North-Western property boundary of Fancourt Golf Estate, located south of the R404 (Source: Google Aerial Image, Confluent Consulting).

3. MAINTENANCE MANAGEMENT PRINCIPLES

This MMP is prepared using the guiding principles for landowners and managers considering the development of a MMP, as provided in the **MMP template for watercourses (2017)** as well as **Appendix 4 of the Environmental Regulations** (as amended) and has been informed by detailed **aquatic specialist input**.

These are summarised as follows:

- Avoid and reduce unnecessary maintenance (improved design)
- The condition of physical and ecological processes that drive and maintain aquatic ecosystems in a catchment must inform a MMP relative to the desired state of the affected system (aquatic specialist provided input – refer to attached specialist report;
- Management actions/outcomes must aim to prevent further deterioration to the condition of affected watercourses and, overall, be guided by a general commitment to improving and maintaining ecological infrastructure for the delivery of ecosystem services (aquatic specialist has confirmed that the improved design will improve the ecological condition at the site); and
- Managers and organs of state must identify, address and, where feasible, eliminate the factors that necessitate intrusive, environmentally damaging maintenance.

4. RELEVANT LEGISLATION

The maintenance work proposed in this MMP is mostly located within the regulated area of the Modder River which by definition is defined as a natural watercourse[1], inclusive of the associated wetland habitat (albeit heavily modified and transformed as a result of the R404 bridge and security fence).

The **National Environmental Management Act (NEMA),** as well as the **National Water Act (NWA)** are therefore considered in terms of this MMP. For the purposes of the maintenance as described, Dr Dabrowski conducted a Risk Matrix through which he determined that the impacts of maintenance is deemed to be Low Risk. Therefore the Breede-Olifants Catchment Management Agency (BOCMA) can consider this repair/maintenance work in terms of a General Authorisation (GA) (to be confirmed).

5. STATUS QUO & MAINTENANCE WORK REQUIREMENTS

The specific section of the fence, particularly the supporting gabion wall running across the watercourse, is dilapidated and requires improvement (to reduce maintenance), and repairs.

The displaced gabion structure has created a sharp, vertical drop (approximately 1m deep) in elevation along the western alignment of the gabion structure. According to Dabrowski (2024) this

[1] **"Watercourse"** means:
(a) a river or spring;
(b) a natural channel in which water flows regularly or intermittently;
(c) a wetland, lake or dam into which, or from which, water flows; and
any collection of water which the Minister may, by notice in the Gazette, declare to be a watercourse as defined in the National Water Act, 1998 (Act No. 36 of 1998); and a reference to a watercourse includes, where relevant, its bed and banks.
"Wetland" means, land which is transitional between terrestrial and aquatic systems where the water table is usually at or near the surface, or the land is periodically covered with shallow water, and which land in normal circumstances supports or would support vegetation typically adapted to life in saturated soil.

has caused localised erosion of the riverbed and represents a significant risk to the downstream wetland. Failure to address this problem will result in continued erosion of the riverbed that could potentially also put upstream infrastructure such as the R404 bridge, at risk.

The existing elevated gabion structure impedes flow and concentrates flows along specific sections of the watercourse, which further exacerbates erosion and formation of channels through wetland habitat downstream of the fence.

The current design of the existing fence does not accommodate flood events and associated flood debris will require ongoing maintenance.

The proposed maintenance will be implemented ito the following methodology:

- **Creating a temporary access down the western bank of the river (between the R404 bridge and security fence) inclusive of a laydown area for materials;**
- **Removal of the surface fence structure from on-top the support structure (gabions / reno mattresses);**
- **Removal of material and existing gabions / reno mattresses and fill materials, as well as vegetation that has accumulated around existing infrastructure;**
- **Backfill and restacking of gabions / reno mattresses in the same position, with the same footprint, albeit 'smaller' and lowered to be level with the riverbed to reduce its impact of being an obstruction;**
- **Installation of new, improved fence on-top of the support structure;**
- **Reshaping and rehabilitation of the work area and downstream riverbed where erosion has occurred as a result of the existing fence structure;**
- **Rehabilitation of the temporary access and laydown area.**

It is the overall finding of the aquatic specialist that the new design reduces the extent of built infrastructure i.e. obstruction in the watercourse and will facilitate unimpeded flow across the entire extent of the valley bottom, thus being more representative of natural flows and improving the ecological state at the site.

6. STAKEHOLDER ENGAGEMENT PROCESS

The Department of Environmental Affairs & Development Planning (DEADP) who is the Competent Authority for considering the MMP, approved the Public Participation Plan on 17 July 2025. Accordingly, the draft MMP is made available to the following key stakeholders and mandated Authorities:

- **Breede-Olifants Catchment Management Agency (BOCMA)**
- **Provincial Department of Roads/Transport**
- **CapeNature**
- **George Municipality (environmental directorate)**

In addition to notifying these stakeholders, the following measures are also implemented to ensure a wider and transparent process:

- **Site Notices** placed along the fence line in question alerting passers-by of the MMP process and their right to participate and/or give comment;
- **Advert** in the *George Herald* appeared on Thursday, 6 August 2025 advising readers of their right to participate and/or give comment;
- Notification of neighbouring **land owners 500m upstream** of the Modder River from the fence (maintenance activity), as well as land owners 500m downstream of the fence

(maintenance activity), as well as land owners on the opposite side of the banks of the fence (maintenance activity);

- Erf 3607, RE/2/209, Prt 9/209, Portion 22/209 are all upstream, Fancourt Home Owners Association area all downstream and opposite sides of the activity.

To register as a stakeholder, Interested & Affected Parties must submit their complete contact details, along with any comments to below contact person. The commenting period on this draft MMP extends from 8 August – 8 September 2025, allowing for a 30-day review and commenting period. All submission must reach *Cape EAPrac* by no later than 8 September 2025 and must be addressed to:

Cape EAPrac c/o Louise-Mari van Zyl
louise@cape-eaprac.co.za
PO Box 2070, George, 6530
Tel: 044-8740365 for any enquiries or digital copies of the report

All submissions received during this period, will be considered and responded to through means of a Comments & Response Report for the Competent Authority to consider as part of their review and decision-making process.

Cape EAPrac will communicate the outcome of the DEADPs decision with all registered Interested & Affected Parties.

7. DATA COLLECTION AND ASSESSMENT

Specialist input was obtain in the form of an aquatic specialist assessment, as well as responding engineering designs. Data collection and the assessment necessary to inform this MMP included the following considerations/data sets:

- Aerial imagery (recent as well as historic);
- Applicable literature were considered, namely the Western Cape Biodiversity Spatial Plan (2023 as adopted 2024), Critical Biodiversity Areas (CBA), Ecological Support Areas (ESA), Ecosystem Threat Status (SANBI) and the National Freshwater Priority Areas (NFEPA) datasets;
- Broad climatic and habitat conditions were considered ito rainfall patterns, national freshwater priority area, mapped vegetation and soils;
- The aquatic specialist considered the catchment features of the Modder River and conducted a watercourse classification, which is important to understand the hydrological and geomorphic drivers that characterise the watercourse and therefore assists in the interpretation of impacts to the watercourse.
- The aquatic specialist delineated the wetland remnants of the Modder River in the vicinity of the fence (relying on the presence or absence of key indicators at selected points along the fence through augering);
- Using the above-mentioned data, the present ecological state (PES) was determined, along with the ecological importance and sensitivity of the watercourse / aquatic feature;
- Site assessments and field surveys by the EAP, Aquatic Specialist and Engineer.

It was confirmed that the study area is located within an **unchanneled valley-bottom wetland** (UVB) of the Modder River. These wetlands typically occur along relatively broad, unconfined, low gradient valley bottoms and in their natural condition, such wetlands typically act as efficient flood attenuation and streamflow regulation features.

As a result of the historic modifications in the Modder River and wetland, associated with the R404 bridge, existing fence, culverts as well as upstream invasive alien vegetation and agricultural practices, the assessment found the Present Ecological State (PES) to be **Largely Modified** (category D awarded by Dabrowski, 2024) and the Ecological Importance & Sensitivity i.e. overall **ecological importance** of the affected wetland, to be **Low.**

8. METHOD STATEMENT

Please refer to **Section 7.3.1 of the attached Aquatic Specialist Report** for the detailed Method Statement that specifically address the following key actions (extracts below taken directly from the specialist report):

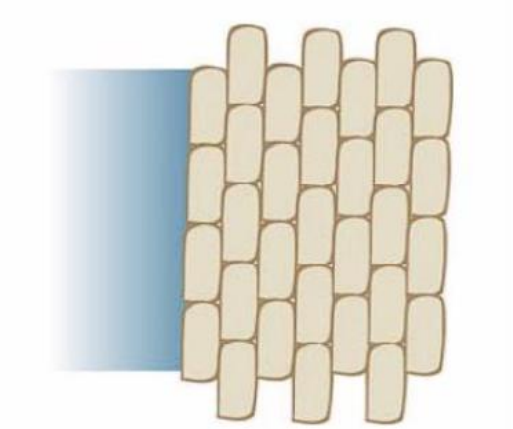
1. **Removal of the existing fence**
2. **Instate the new fence**
3. **Reshaping and rehabilitation of the riverbed**
4. **Future maintenance (operational phase)**

7.3.1 Removal of Existing Fence

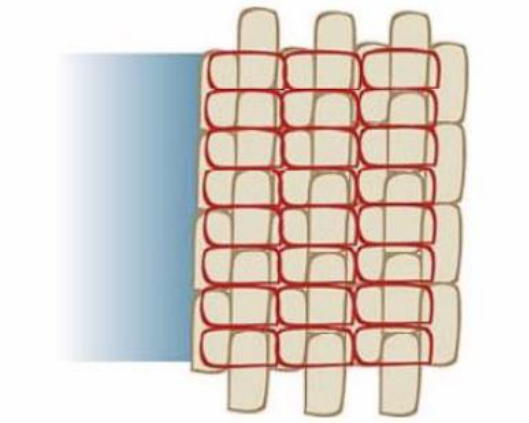
Fence removal includes the physical removal of the fence and associated infrastructure (e.g. gabion wall, poles, fence foundations etc.). The fence must be removed in such a manner that it does not cause degradation to the river. Generic impacts are associated with the presence/operation of workers, machinery and materials required for maintenance activities within the watercourse and include the following:

- Pollution of watercourses through leakage of fuels, oils, and other pollutants from vehicles and machinery, or from washing of equipment and vehicles;
- The presence of workers on site will require the need for appropriate ablution facilities. Poor management of these facilities could potentially lead to sewage spills or leaks which could contaminate the watercourse;
- Storage of materials or the temporary lay-down of equipment within an area that drains in the direction of the watercourse;
- Dumping of waste material (e.g. fencing, fence posts, concrete foundations etc.) into the watercourse;
- Poor management of waste generated during maintenance activities; and
- Mixing of concrete or cement in or in close proximity to the watercourse.

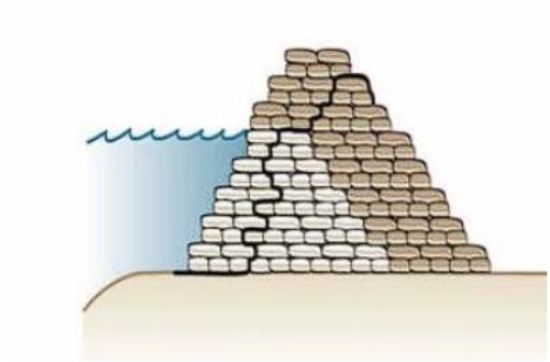
- Lay first course/bottom layer of bags perpendicular to flow direction of watercourse (Figure 14);
- Offset the bags from the previous row in the same course to form a brick pattern (Figure 14);



- Rotate bags 90 degrees when laying second course of sandbags. Keep seal side of bag towards water/river. Ensure sandbags are well packed against each other and firmly in place (Figure 15);



- Weave the polyethylene sheet between the courses of sandbags as to have at least one layer of sandbags protecting the polyethylene sheet from debris punctures (Figure 16).



- Ensure that barrier structures are of sufficient height to prevent waves or overflows from flooding the enclosed work area.
- Waters adjacent to the barrier structures should be inspected for turbidity on a continuous basis. Excessive turbidity should be addressed and eliminated to the extent possible.

- Diversion must not result in the passage of sediment-laden water into downstream areas, or cause erosion of the bed and banks of the watercourse;
- Stockpiles of excavated soil or rocks must be placed outside of the delineated area of the wetland on as flat an area as possible and protected (using a tarpaulin or plastic sheeting) to prevent surface runoff of material into the watercourse;
- Excavated material that will not be re-cycled for use in the maintenance activities (e.g. wire mesh, bidem etc.) must be removed from the site and disposed of at a suitable facility;
- Chemical toilets should be provided on-site at 1 toilet per 10 construction workers/personnel;
- Waste from chemical toilets must be disposed of regularly (at least once a week) in a responsible manner by a registered waste contractor;
- Excavators and all other machinery and vehicles must be checked for oil and fuel leaks daily. No machinery or vehicles with leaks are permitted to work in the watercourse;
- No fuel storage, refuelling, vehicle maintenance or vehicle depots to be allowed within the watercourse; and

- Refuelling and fuel storage areas, and areas used for the servicing or parking of vehicles and machinery, must be located on impervious bases and should have bunds around them (sized to contain 110 % of the tank capacity) to contain any possible spills;
- Re-vegetation of any exposed areas (i.e. access routes, stockpile areas etc.) must be implemented timeously. In this regard, the banks should be appropriately and incrementally re-vegetated as soon as construction allows; and
- The watercourse must be inspected on a regular basis (at least weekly) by an appropriately qualified Environmental Control Officer (ECO) for signs of disturbance, sedimentation and pollution during maintenance activities. If signs of disturbance, sedimentation or pollution are noted, immediate action should be taken to remedy the situation and, if necessary, a freshwater ecologist should be consulted for advice on the most suitable remediation measures.

7.3.2 Construction of New Fence

Construction of the fence will involve construction of the supporting columns (concrete foundation, gabion boxes, reno mattress and I-section columns).

7.3.2.1 Impact Mitigation

- Areas where construction activities will take place must be confined to clearly demarcated areas so as to prevent unnecessary disturbance of instream habitat outside of these areas.
- Since the supporting columns will be installed within the riverbed, construction must be sequenced so that they are put in place with the minimum possible delay. Disturbance of areas where supporting columns are to be constructed must be undertaken only when final preparation and placement can follow immediately behind the initial disturbance;
- Dry working conditions must be established by constructing temporary stream diversions (as described in Section 7.3.2.1 above);
- A construction schedule must be developed and clearly defined so as to avoid multiple sites being exposed and unattended to at any moment in time. The completion date for each phase of development must be indicated and all clearing, excavation, and stabilisation operations must be completed before moving onto the next phase.
- Cement/concrete used in the construction must not be mixed on bare ground or within the watercourse. An impermeable/bunded area must be established in such a way that cement slurry, runoff and cement water will be contained and will not flow into the surrounding environment, the stream or riparian zone or contaminate the soil;
- All waste materials must be collected and disposed of at a suitable waste facility; and
- The laydown area and stockpiles of construction materials must be placed outside of the delineated wetland area (on as flat an area as possible) and protected (e.g. through use of sandbags and/or tarpaulins) to prevent materials being washed into the watercourse.

7.3.3 Reshaping and Rehabilitation of Riverbed

As described above, removal of the gabion wall will result in a vertical drop-off that will be highly susceptible to erosion. It is recommended that the drop-off is protected by Void-Filled Riprap (VFR), which is essentially a construction material used to emulate natural riffle rock found in coarse gravel and cobble bed streams. The goal of VFR is to fill the voids of the conventional riprap (typically made up using large rocks) using a broad range (or size classes) of materials (cobbles, gravels, sands, and onsite soils) to emulate natural riffle rock. The mixture should create a dense, interlocking mass that keeps water flowing on the surface, mimicking a natural stream bed and encouraging growth of vegetation in trapped sediment. Material from the gabion structures that will be demolished can be used as a contributing material to the VFR.

7.3.3.1 Impact Mitigation

- Calculations must be done to determine the size of the largest rocks required for the VFR to withstand peak flows. It is anticipated that rocks larger than those used in the existing gabions will need to be imported to the site;

- The area(s) chosen for the stockpiling of excavated and imported VFR materials must be demarcated, and notices put up declaring what must be stockpiled where. No materials may be stockpiled within the delineated wetland area.
- Dry working conditions must be established by constructing temporary stream diversions (as described in Section 7.3.2.1 above).
- Prior to the placement of VFR, the vertical drop-off must be reshaped to a sloping gradient (1:2). The surface of the slope must be reasonably smooth, and free of mounds, dips, etc.
- The reshaped riverbed must be lined with a geotextile, the purpose of which is to retain the coarser particles of the riverbed while remaining permeable enough to allow water to move through the filter in both directions (infiltration and exfiltration). The geotextiles must have adequate strength to withstand installation stresses during placement.
- The geotextile must be placed in such a manner that placement of the overlying materials will not excessively stretch or tear the geotextile.
- VFR must be placed so that is reasonably homogeneous, with the larger rocks uniformly distributed and firmly in contact with the smaller rocks and gravel filling the voids between the larger rock. Hand placement of void filling material must be completed to ensure a final surface which is smooth and with no voids greater than 10 cm present between rocks.
- VFR must be provided with a key (or toe down) below the elevation of the riverbed. The depth of the key should be at least as great as the depth of the anticipated long-term bed degradation plus the scour at the toe.

7.3.4 Future Maintenance (Operational Phase)

Given the design of the fence, routine maintenance will be required following flood events. This may include *inter-alia* repair to fence posts, re-installation of fence panels and maintenance of VFR.

7.3.4.1 Impact Mitigation

- A schedule must be drawn up to prompt inspection of the fence and VFR (at least once a month for the first six months and then once every six months thereafter), so that any maintenance activities can be undertaken timeously so as to prevent damage to infrastructure and deterioration of the watercourse;
- Any maintenance required for the fence must adopt the mitigation measures specified under Section 7.3.2.1 and 7.3.3.1.

In addition to these specific method statements, the following serves as a general guide required to minimise the spatial impact of the maintenance activity:

- **Prior to site establishment or any work commencing, an ECO must be appointed to oversee and monitor the repair, maintenance and rehabilitation phases of the activity;**
- **The ECO must conduct regular (minimum weekly) site inspections for the duration of the activity;**
- **Prior to completion/rehabilitation, an Aquatic Specialist must be appointed to inspect the site to ensure that the Contractor has achieved the outcome as per the specifications of the Aquatic Specialist Report compiled for this activity;**
- **Repairs and maintenance must be undertaken within the dry season, except for emergency maintenance works.**
- **Where at all possible, existing access routes must be used via the R404. In cases where none exist, a route should be created through the most degraded area;**
- **Responsible management of pollutants through ensuring handling and storage of any pollutants is away from the watercourse. When machinery is involved, ensure effective operation with no leaking parts and refuel outside of the riparian area, at a safe distance from the watercourse to manage any accidental spillages and pose no threat of pollution.**
- **At no time may the flow of the watercourse be blocked (temporary diversions may be allowed) nor should the movement of aquatic and riparian biota (noting breeding periods) be prevented during maintenance actions.**
- **No new structures/infrastructure beyond the existing, may be created.**
- **In circumstances which require the removal of any top soil i.e. site camp, this must be sufficiently restored through sustainable measures and practices.**
- **Concerted effort must be made to actively rehabilitate repaired or reshaped bed and banks of the river, where affected, with indigenous local vegetation.**
- **No deepening of the watercourse beyond the original, pre-damage determined riverbed, unless such deepening is directly related to the natural improved functioning and condition of the watercourse as part of the rehabilitation and confined to the work area along the existing fence line.**
- **Where at all possible, limit the disturbance to the zone of the working area. This is due to the ecological importance of the low flow channel and respective habitat being allowed to re-establish improving the ecological condition.**
- **The build-up of debris/sediment removed from a maintenance site may:**
    - **be utilised for the purpose of in-filling or other related maintenance actions related to managing erosion, which form part of an adopted MMP/Environmental Authorisation;**
    - **not be deposited anywhere within the watercourse or anywhere along the banks of a river where such action is not part of the proposed maintenance activity (ies). Material that cannot be used for maintenance purposes must be removed out of the riparian area to a suitable stockpile location in the site camp, or disposal site.**

- **The use of foreign material, such as concrete, rubble, woody debris and/or dry land based soil, is strictly prohibited from being used in maintenance actions, unless for the specific purpose of repairs to existing infrastructure, coupled with appropriate mitigation measures.**

- **On completion of the maintenance action, the condition of the site in terms of relative topography must be similar to the pre-damaged state (i.e. the shape of the river bank should be similar or in a state which is improved to manage future damage as per the design). This ultimately dictates that the channel, banks and bed cannot be made narrower, higher or deepened respectively.**

- **Upon completion of the work/rehabilitation the Aquatic Specialist must provide feedback to the appointed ECO for the purposes of a Completion Report to be submitted to the DEADP and BOCMA for record purposes.**

9. MONITORING AND REPORTING

It is important to note that any and all activities undertaken outside the scope of the adopted MMP, in terms of the action outlined within the given method statement, the responsible person(s) will be subject to Section 24(F) of NEMA and that appropriate enforcement and compliance requirements will follow.

Once adopted, the MMP becomes a statutory document the Proponent must comply with during all maintenance activities as described in this MMP.

To ensure compliance the Proponent must appoint a suitably experienced environmental control officer (ECO), or a suitably qualified aquatic specialist, to oversee the maintenance work and report on monitoring to the Competent Authority.

The ECO must be assisted by an Aquatic Specialist for the last phase of the activity, before the Contractor leaves the site, to ensure that the rehabilitation of the watercourse is conducted according to the aquatic specialist requirements. This is to ensure that the Contractor is still available (on-site) for any remaining work that must be done before the Completion Statement can be compiled.

- Frequency of monitoring must be **daily** for when the supporting structures are removed / reinstated, as well as when the downstream erosion caused by the existing fence structure, is reshaped.

- Frequency of monitoring inspections can be reduced to **weekly** when the fence is installed and rehabilitation of the affected environment takes place.

- A **monitoring report** must be compiled and submitted to the Competent Authority on a **monthly** basis.

- A **completion statement report** must be submitted to the Competent Authority within **10-working days** from when maintenance and rehabilitation is completed.

The following Forms A and B are to be considered as a guideline in terms of the type of information required. It is proposed that Form A below must be completed by the relevant person(s) before maintenance activities are undertaken and Form B after a maintenance activity has been completed. A copy of each completed Form A & B must be sent to the relevant WUA/IB/local authority management if they have undertaken the development of the MMP. For any individual landowner applications, the landowner is responsible to ensure a record of all maintenance activities is recorded as per Form A & B below.

The Department may, within a reasonable notice period, request to evaluate the maintenance activities and assess the maintenance sites as per the adopted MMP.

Form A must be completed at **least 7 working da**ys before the commencement of any maintenance activity and Form B at least **10 working days following the completion** of the maintenance activity(ies).

At least two photographs are required from two different points of perspective (A and B) looking at the site (coordinates of these points are required). When listing the type and reference code, this must be done by specifically listing the relevant detail within the adopted MMP.

REPORTING FOR INTENT TO UNDERTAKE MAINTENANCE ACTIVITIES – FORM A				
Section A: Landowner Details				
Name	**Surname**	**Farm No.**	**Erf No.**	**Today's Date**
Section B: Details of proposed maintenance activity				
WUA/GA reference number and DEA&DP reference number for MMP.	**Activity Type:**	**Reference code (*make reference to MMP*)**	**Footprint area (m^2)**	**Volume of material (m^3)**
Equipment to be used:	**Description of method for planned activity:**			**Date when work will commence:**
Date of last flood event for site:	**Note any further damage and comments regarding the state of the site**			
Section C: Photographs of activity location before maintenance				
Before A **Coordinates:** **S** **E**				
Before B **Coordinates:** **S** **E** **Date of photos taken:**				

REPORTING FOR COMPLETION OF MAINTENANCE ACTIVITIES – FORM B				
Section A: Landowner Details				
Name	**Surname**	**Farm No.**	**Erf No.**	**Today's Date**
Section B: Details of proposed maintenance activity				
WUA/GA reference number and DEA&DP reference number for MMP.	**Activity Type:**	**Reference code (*make reference to MMP*)**	**Footprint area (m^2)**	**Volume of material (m^3)**
Equipment that was used:	**Description of method for completed activity and if commence date changed**			**Date activity completed**
Date of last flood event for site:	**Note any challenges or difficulties experienced in following the MMP method statement**			
Section C: Photographs of activity location after maintenance				
After A **Coordinates:** **S** **E**				
After B **Coordinates:** **S** **E** **Date of photos taken:**				

Ecosystem Guidelines for Environmental Assessment in the Western Cape, Edition 2, 2016. Available at: www.bgis.org.za

Wetland offsets: A best practice guideline for South Africa, 2016. Available at: http://www.wrc.org.za

Preliminary guideline for the determination of buffer zones for rivers, wetlands and estuaries, 2014. Available at: http://www.wrc.org.za

National Water Act, 1998 (Act No. 36 of 1998). Available at: http://www.gov.za/documents/national-water-act

General Authorisation, in terms of Section 39 of the National Water Act, 1998 (Act No. 36 of 1998) for water uses as defined in Section 21(c) or Section 21(i).

Confluent Consulting 2025. Aquatic Assessment Fancourt Fence Maintenance.