

**RESIDENTIAL DEVELOPMENT ON THE REMAINDER
OF PORTION 60 OF THE FARM PLATTEBOSCH NO.
485, STILL BAY, WESTERN CAPE
EA REF: 16/3/3/5/D5/19/0001/22**

**PRE-CONSTRUCTION
START-UP ECO REPORT
JUNE 2024**

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1. Abbreviations used

The following abbreviations (in alphabetical order) have been used below:

Basic Assessment Report	BAR
Department of Environmental Affairs and Development Planning	DEA&DP
Environmental Authorisation	EA
Environmental Control Officer	ECO
Environmental Management Programme	EMP
Storm Water Management Plan	SWP

2. ECO Objectives

The objective of the pre-construction meeting and site visit held, and ECO report provided were to conduct plant species search and rescue and discuss the requirements of the approved EA and EMP with the EA holder and determine readiness in terms of compliance to the EA and EMP before constructions activities commences on site. Compliance to pre-construction conditions were also assessed. This report summarises what was discussed and assessed at the meeting and site visit indicates what is still required before construction activities may commence on site.

3. ECO Scope

Enviro-EAP (Pty) Ltd is appointed as the independent ECO, as required by the EIA regulations promulgated in terms of Section 24 of the National Environmental Management Act (107 of 1998) as amended, for the construction phase of the development.

According to the EA and EMP requirements ECO compliance monitoring and inspections must be conducted monthly during the construction phase to determine whether or not all environmental conditions as stipulated in the EA, EMP and specialists reports are implemented and monitored throughout the construction phase of the project.

4. External ECO Methodology and Responsibilities

In accordance with the requirements of the EMP the ECO must and will be responsible for the following:

- Be appointed prior to commencement of any works (i.e. removal and movement of soil and / or rubble or construction activities commencing).
- Ensure and monitor compliance with the EMP and the amended EA conditions.
- Keep record of all activities on the site; problems identified; transgressions noted and a task schedule of tasks undertaken by the ECO.

- Remain employed until all development activities are concluded, and the post construction rehabilitation and monitoring requirements are finalised.
- Monitor the on-site environmental management and implementation of the construction and rehabilitation phase specifications specified in this EMP.
- Assist to ensure that the conditions of the environmental authorisation will be complied with as well as with training of workers.
- Request and review the construction method statements of the contractors.
- Conduct monthly site monitoring of construction in respect of compliance with the EA and EMP.
- Report on the implementation of the EMP on a monthly basis.

The ECO cannot be held liable legally or otherwise as a result of non-compliance with the amended Environmental Authorisation or the EMP, liability remains with the EA Holder.

5. Identification of the ECO Client

The ECO client is the EA holder WH van Schalkwyk Vervoer BK.

6. Identification of the ECO Team

The ECO duties will be fulfilled by Johmandie Pienaar and Nicolaas Hanekom of Enviro-EAP.

7. Date of ECO Visit/s

The first ECO site visit and inspection was conducted on 19 June 2024 prior to any site clearance activities taking place on site.

8. Key Activities on The Site

The boundary of the no-go areas has been demarcated by a land surveyor and the ECO inspected the demarcation for correctness.

During the time of the visit the ECO also surveyed the site for potential viable indigenous vegetation species for search and rescue such as bulbs, succulents and restios. No bulb species were observed within proposed development area to be cleared limited restios and succulents were observed and recommended for search and rescue refer to table and pictures below for further related information.

9. Summary ECO Findings and Recommendations as discussed with the EA Holder

Finding No.	Area of activity	ECO Findings and Recommendations
J1	No-go boundaries and protected	During the time of the inspection, it was found that the boundaries of the no-go areas were correctly demarcated, however as per the requirements of the EA and EMP protected Milkwood trees must be

	<p>Milkwood trees within and along no-go boundaries</p>	<p>avoided as far as possible and may not be impacted or damaged during any construction activities without authorisation/permits.</p> <p>It was observed that several Milkwood trees are located along the edge of the no-go areas as demarcated and impacts on these Milkwood trees can and must be avoided by adjusting the demarcations of the no-go boundary to exclude the Milkwood trees. Refer to the map below</p> <p>In some instances especially where demarcation was conducted within dense vegetation, there are no line of sight from one demarcation marker to the other, hence it was discussed with the EA holder that the demarcation markers must be clearly visible before any site clearance activities commences and this must be achieved by increasing the amount of demarcation markers placed along the no-go areas and clearing dense vegetation by hand i.e. chain saws to make sure that there is a clear line of sight visible from the one marker to the other so that machine operators do not impact on vegetation within no-go areas.</p>
<p>J2</p>	<p>Milkwood trees within proposed development area</p>	<p>At least 15 Milkwood trees were observed within the Phase 1 development area. NO MILKWOOD TREES MAY BE IMPACTED OR DAMAGED during any site clearance or construction activities.</p> <p>Extreme caution must be exercised during site clearance activities to ensure no impacts or damage to any protected Milkwood trees occurs.</p> <p>Once the Phase 1 development area has been cleared all Milkwood trees located within the approved development area must be recorded and applications for removal, relocation or pruning must be applied for and obtained from the relevant authority before any of these Milkwood trees may be impacted upon. As far as possible these trees must be accommodated on the layout within the proposed even.</p> <p>Dense stands of Milkwood trees were also observed within Phase 2 and Phase 3 remaining indigenous vegetation areas and when these areas are being cleared the shrubs around the Milkwood trees must be carefully cleared by hand not to damage any Milkwood trees and all Milkwood tress must be recorded and where removal or impacts on these trees cannot be avoided applications for removal, relocation or pruning must be applied for and obtained from the</p>

		<p>relevant authority before any of these Milkwood trees may be impacted upon.</p> <p>Refer to the map below.</p>
J3	Construction Camp	<p>It was discussed and agreed with the EA holder that the construction camp will be established at the main entrance to the site which is further that 32m away from the edge of the drainage lines and not within an area containing Milkwood trees. Refer to the map below.</p> <p>All relevant construction camp requirements as per the EMP must be accommodated within this construction camp i.e. stockpiling; bunded fuel storage; fire fighting equipment; clear notice board with emergency telephone numbers; closed ablution facilities/chemical toilets for staff; hard copies of EA and EMP etc.</p>
J4	Plant Search and Rescue	<p>During the time of the visit search and rescue of viable indigenous vegetation species commenced under the guidance of the ECO. No bulb species for search and rescue operations were observed on the proposed development site, but restios and Mesembryanthemum sp. (small succent fig species) were identified for search and rescue and a suitable area as part of Phase 2 was identified for temporary relocation of these species until they can be used for rehabilitation purposes.</p> <p>Search and rescue operations continued over three days and success of temporary relocation of these species on site will be monitored by the ECO during the monthly site inspections.</p>
J5	Training and Awareness	<p>All staff and contractors working on site must receive environmental awareness training on the requirements of the EA and EMPr before starting work on site. The site manager must provide a copy of the signed attendance register to the external ECO and keep a copy on site.</p>
J6	Complaints	<p>The site manager must keep a complaint register within which all public complaints must be recorded as well as how they were dealt with.</p>
J7	Waste Management	<p>Closable, weather proof and animal proof waste bins must be provided at the site which is emptied on a regular basis and disposed of at the local municipal skip or landfill site. These bins may not be located within any no-go areas. A waste register must be maintained recording when, where, type of waste and how much is disposed of at the municipal skip or landfill site.</p>

J8	Fire Fighting	Suitable fire fighting equipment must be available on site i.e. fire extinguishers before construction activities commences
J9	Ablution/Toilet Facilities	A suitable toilet i.e. portable chemical toilet must be available at the construction camp before construction activities commences. This toilet must be serviced regularly and no leakage or pollution may occur.
J10	Stormwater Management	<p>As per the requirements of the EMP the detailed stormwater management plan must be provided to the ECO for inputs before finalisation. The draft SWMP has been provided to the ECO for inputs and a meeting was also held with the engineer during the first ECO site visit to discuss the plans as proposed.</p> <p>During engineer investigations it was determined that stormwater attenuation facilities would be required within the no-go areas to accommodate stormwater from the proposed development area.</p> <p>After the initial site visit the ECO recommended alternative locations for the attenuation ponds taking into consideration the steep gradients of the drainage lines within the no-go areas. Before the detailed SWMP can be finalised and implemented it is recommended that the SWMP proposal also be represented to the Department for inputs to ensure that the proposal remains within the scope of the authorisation as it relates to the requirements of the EA and EMP.</p>

10. Conclusion

The findings and recommendations as listed in the table above is not a complete list of the EA and EMP requirements to be adhered to by the EA holder. This is just a summary of issues discussed with the EA holder before site clearance commences on site and recommendations on what still needs to be complied with before clearing commences etc. It remains the responsibility of the EA holder to ensure that he/she understands and adheres to ALL the requirements of the EA and EMP.

Should there be any uncertainty on the requirements the EA holder must please contact the external ECO to discuss and clarify.

This external ECO report has been compiled by environmental assessment practitioner Johmandie Pienaar from Enviro-EAP.



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Map 1: June 2024 ECO map for indicating areas where Milkwood trees was observed and to be avoided; proposed construction camp placement; proposed search and rescue plants temporary placement; and Phase 1 no-go area boundary demarcation to be adjusted to exclude Milkwood trees present along the no-go boundary.

Supporting photographs:



Photo 1: Restios observed on Phase 1 development areas removed for plant search and rescue purposes (photo taken 19 June 2024).



Photo 2: Active restio plant search and rescue operations taking place at Phase 1 development area before site clearance (photo taken 19 June 2024).



Photo 3: Dense Milkwood tree stands observed within Phase 2 development area, Milkwood trees not to be impacted upon by any site clearance of construction activities without authorisation (photo taken 19 June 2024).



Photo 4: Demarcation of Phase 1 no-go boundary (photo taken 19 June 2024).



Photo 5: Suitable area identified on site for temporary relocation of plants searched and rescued (photo taken 19 June 2024).



Photo 6: Restios observed on Phase 1 development areas removed for plant search and rescue purposes (photo taken 19 June 2024).



Photo 7: Mesembryanthemum sp (succulent figs) observed on Phase 1 development areas removed for plant search and rescue purposes (photo taken 19 June 2024).



Photo 8: First example of no-go boundary demarcation marker next to Milkwood tree which must be moved inwards (within approved development area) to exclude Milkwood tree from development area (photo taken 19 June 2024)



Photo 9: Second example of no-go boundary demarcation marker next to Milkwood tree which must be moved inwards (within approved development area) to exclude Milkwood tree from development area (photo taken 19 June 2024)



Photo 10: Mesembryanthemum sp (succulent figs) observed on Phase 1 development areas removed for plant search and rescue purposes (photo taken 19 June 2024).