



**LORNAY**  
ENVIRONMENTAL CONSULTING

# **Operational Environmental Management Plan**

Remainder of Farm 826, Farm 824 and Farm 887

13 March 2024

Updated 12 November 2024

## **Consultant:**

**Michelle Naylor** | Env. Consultant | M.Sc., Pr. Sci. Nat., EAPASA  
cell: 083 245 6556 | [michelle@lornay.co.za](mailto:michelle@lornay.co.za) | [www.lornay.co.za](http://www.lornay.co.za)  
Unit 5/1F, Hemel & Aarde Valley, Hermanus  
Lornay Environmental Consulting Pty Ltd | Reg 2015/445417/07

## DOCUMENT CONTROL SHEET

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ISSUED BY: Lornay Environmental Consulting (Pty) Ltd  
Michelle Naylor  
PO Box 1990  
Hermanus  
7200  
Tel: 083 245 6556  
[www.lornay.co.za](http://www.lornay.co.za)

CLIENT: Rusty Gate Mountain Retreat (Pty) Ltd

TITLE: Expansion of tourism overnight and associated activities,  
Farm 824, Remainder of Farm 826 and Farm 887, Caledon  
RD

REFERENCE: OEMP/RG/Rev2

REPORT DATE: March 2024 – updated November 2024

## **STATEMENT OF INDEPENDENCE**

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Lornay Environmental Consultants nor any of the authors of this report have any material present or contingent interest in the outcome of this report, nor do they have any financial or other interest which may affect the independence of the author(s) or Lornay Environmental Consulting. The consultant fees paid to Lornay Environmental Consulting for the completion of this report is in line with standard professional fees and daily rates. The settling of the professional fee is not dependent on the outcome of the report.

### **DETAILS OF THE AUTHOR(S)**

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EAP ORGANISATION: Lornay Environmental Consulting (Pty) Ltd

AUTHOR: Michelle Naylor

EAPASA REG. NO.: EAPASA (2019/698)

SACNASP REG. NO.: 400327/13

EAP QUALIFICATIONS: Bachelor of Science (Hons); Master of Science (Rhodes University), EAPSA., SACNASP., IAIASA., cand. APHP

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## 1. INTRODUCTION

This Environmental Management Plan (EMP) serves as a guideline document for the operational phase of the existing structures as well as the development on new tourism overnight structures, on the Rusty Gate Mountain Retreat being, Remainder Farm 826, Farm 824 and Farm 887, Theewaterskloof Municipal area, Caledon RD.

This EMP describes mitigation measures and is prescriptive, identifying specific individuals or organisations responsible for undertaking specific tasks during the operation and decommissioning phase of the development, with the aim to ensure that potential impacts on the environment during operation are minimised and / or avoided. The EMP is an open-ended document and may require updating from time to time and as the activities evolve on site. This EMP has been compiled as part of the Basic Assessment process and once approved by the Competent Authority, is legally binding.

## 2. OPERATIONAL ACTIVITIES

The operation of the additional tourism overnight offerings and dwelling, with associated infrastructure:

### *Operation*

- Operational activities relate to long term residential and tourism overnight, as well as large scale annual events such as music festivals and mountain biking or trail running events
- Maintenance of dwellings, tourism units and farm areas in general
- General site wide management including fire management, alien vegetation clearing, maintenance of roads and general upkeep

### *Decommissioning*

Decommissioning is not applicable.

## 3. KEY TERMS AND ABBREVIATIONS

BAR	Basic Assessment Report
CARA	Conservation of Agricultural Resources Act (Act No. 43 of 1983)
DEA&DP	Department of Environmental Affairs and Development Planning (Western Cape)
EA	Environmental Authorisation
ECA	Environment Conservation Act (Act No. 73 of 1989)
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
NEMA	National Environmental Management Act (Act No. 107 of 1998)
NEM:BA	National Environmental Management Biodiversity Act (Act No. 10 of 2004)
NEM:WA	National Environmental Management Waste Act (Act No. 59 of 2008)
PPE	Personal Protective Equipment
SDS	Safety Data Sheets
SHE	Safety Health and Environmental

*Basic Assessment* - Process followed to receive Environmental Authorisation from the Competent Authority, necessitated by NEMA. Basic Assessment Report (BAR) is drafted in line with the legislation.

*Competent authority* - The Department of Environmental Affairs and Development Planning (DEA&DP).

*Developer / Applicant* – Rusty Gate Mountain Retreat (Pty) Ltd

*Environmental Control Officer (ECO)* - a suitably qualified person to be appointed by the Developer / Applicant, to oversee the implementation of the EMP and environmental authorisation through the operational phase and into decommissioning (if applicable)

*Environmental Management Plan (EMP)* - this document, approved by the competent authority, to control the implementation of the works on the site in such a way as to ensure that they do not result in undue or reasonably adverse impacts on the environment

*General waste* - Waste that does not pose an immediate hazard or threat to health or to the environment, and includes domestic waste, building and demolition waste, business waste and inert waste

*Hazardous waste* - Any waste that contains organic or inorganic elements or compounds that may, owing to the inherent physical, chemical or toxicological characteristics of that waste, have a detrimental impact on health and the environment. Infectious mortalities are also considered hazardous

*Project manager* - Overall responsible and accountable person for the site during operations. May be the Farm manager or operator

*Safety, Health and Environmental Officer (SHE Representative)* - A representative from each contractor, appointed as a Safety Health and Environmental Officer, assisting the construction manager on Safety, Health and Environmental aspects of the project on any new construction site. General Health and Safety rules applicable to operations and guests indemnity

*Site Manager* – Person responsible for the day-to-day control of all activities and operations on site, if applicable. Can be operator, farm manager, owner etc.

## 4. ENVIRONMENTAL CONTROL ON SITE

### 4.1. Approach

The Table below illustrates the various approaches to be undertaken to manage potential scenarios as a result of the operation of the activity on site:

**Table 1:** Impact management

Avoidance	Avoiding activities that could result in adverse impacts and/or resources or areas considered sensitive.
Prevention	Preventing the occurrence of negative environmental impacts and/or preventing such an occurrence having negative impacts.
Preservation	Preventing any future actions that might adversely affect an environmental resource.
Minimisation	Limiting or reducing the degree, extent, magnitude or duration of adverse impacts

	through scaling down, relocating, redesigning and/or realigning elements of the project.
Mitigation	Measures taken to minimise adverse impacts on the environment.
Enhancement	Magnifying and/or improving the positive effects or benefits of a project.
Rehabilitation	Repairing affected resources, such as natural habitats or water resources.
Restoration	Restoring affected resources to an earlier (possibly more stable and productive) state, typically, 'background' or 'pristine' condition. These resources may include soils and biodiversity
Compensation	Compensating for lost resources, and where possible, the creation, enhancement or protection of the same type of resource at another suitable and acceptable location.

## 5. ENVIRONMENTAL AWARENESS

It is important to ensure that any new contractors and employees as well as guests, to a degree, who are associated with the operation of the activity receive the appropriate level of training and awareness to ensure that continual environmental due diligence and conservation is applied at all levels of operation and into the long term. All users of the site as well as the operator, and any new contractors and employees must be made aware of their responsibilities in terms of relevant legislation, guidelines, as well as this EMP and EA. The original conditions of the Environmental Authorisation (EA) must be known and adhered to.

### 5.1. Aim of the Environmental Awareness

- Promote environmental education and long-term conservation on site
- Inform employees and any new contractors on the applicable environmental procedures and plans
- Ensure conditions of the EA are implemented

### 5.2. Environmental Awareness Training and content

- Awareness training, education or signage should include
  - Original content of EA and goals for long term conservation and management of the site
  - Possible education regarding the site sensitivities as identified during the impact assessment phase
  - Emergency procedures where applicable
- Definitions as used in this EMP should be provided
- How and why environmental protection is necessary, should be explained
- Management measures required to prevent environmental impacts should be outlined
- Awareness should be made of emergency and spills response procedures
- General signage or education awareness regarding environmental principles such as reduce, reuse and recycle, as well as protection of flora and fauna, would be beneficial.



## **6. LEGISLATIVE REQUIREMENTS**

A Basic Environmental Assessment process was applicable in terms of the National Environmental Management Act (Act No. 107 of 1998) (NEMA) and the Environmental Impact Assessment (EIA) regulations (2014) (as amended). Appendix 4 of the NEMA EIA Regulations (GN. R982) sets out the minimum requirements for the drafting of an Environmental Management Plan (EMP). This EMP has been created in fulfilment of these prescribed requirements for the construction phase of the activity. The implementation of this EMP will be a condition of approval of the Environmental Authorisation (EA). Failure by the applicant, to comply with this EMP, will therefore constitute an offence, and the applicant and / or the appointed contractors can be held liable for penalties and / or legal action. It is therefore important that a copy of this EMP be issued to each contractor, preferably at the appointment stage, in order to allow for the costs of implementing the EMP, to be included in cost proposals. This will also ensure that the contractor is aware of his responsibilities prior to appointment and commencement. Each appointed contractor involved in the project, as well as the project manager (as applicable), will be required to sign for and thereby acknowledge contents of, the approved EMP and therefore abide by the specifications of the document and any amendments thereto.

### ***Other applicable legislation***

#### **The Constitution of The Republic of South Africa (Act 108 of 1996)**

The Constitution of the Republic of South Africa states that everyone has a right to a non-threatening environment and that reasonable measures are applied to protect the environment. This includes preventing pollution and promoting conservation and environmentally sustainable development, while promoting justifiable social and economic development.

#### **National Environmental Management Act (Act 107 of 1998)**

The National Environmental Management Act (NEMA), as amended, makes provision for the identification and assessment of activities that are potentially detrimental to the environment and which require authorisation from the relevant competent authorities. NEMA is a National Act, which is enforced by the Department of Environmental Affairs (DEA). These powers are delegated in the Western Cape to the Department of Environmental Affairs and Development Planning (DEA&DP).

#### **National Environmental Management: Biodiversity Act (Act 10 of 2004)**

Chapter 4 of the National Environmental Management: Biodiversity Act, 2004 (NEMBA) deals with threatened and protected ecosystems and species. The need to protect listed ecosystems is addressed (Section 54). Section 73 deals with Duty of Care relating to invasive species, while Section 76(2) calls for development of invasive species monitoring, control and eradication plans by all organs of state in all spheres of government, as part of environmental management plans required in terms of Section 11 of NEMA.

#### **National Environmental Management: Waste Act (Act No. 59 of 2008)**

The National Environmental Management: Waste Act (NEM:WA) provides for specific waste management measures (disposal and storage) and the remediation of contaminated land.

#### **National Environmental Management: Air Quality Act (Act No. 39 of 2004)**

Section 32 provides provision for the control of dust, section 34 provides provision for the control of noise and section 35 provides provision for the control of offensive odours, all which may be experienced during the construction or operation of an applicable development.

**Environment Conservation Act (Act No. 73 of 1989)**

The Environment Conservation Act (ECA) provides provision for the prevention of littering by employees and subcontractors during construction and the maintenance phases of development.

**Occupational Health and Safety Act (Act No. 85 of 1993)**

Section 8 outlines the general duties of employers to their employees and section 9 outlines the general duties of employers and self-employed persons, to persons other than their employees.

**Hazardous Substances Act (Act No. 5 of 1973)**

This Act provides for the definition, classification, use, operation, modification, disposal or dumping of hazardous substances.

## **7. OPERATIONAL PHASE IMPACTS AND MITIGATIONS**

### **7.1. Activity specific impacts and mitigations**

The following activity specific impacts / risks, have been identified for the operational phase of the proposed development:

**Table 2.** Activity specific impacts and mitigations

IMPACT	DESCRIPTION	MITIGATION	MONITORING	RESPONSIBILITY
Ecological / Botanical	Long term protection of the indigenous vegetation and natural fauna, ensuring minimal disturbance of the broader site and sensitive areas which were identified by the specialists during the impact assessment	<ul style="list-style-type: none"> <li>→ Gardens and landscaping to be indigenous vegetation only</li> <li>→ Users and visitors of the site must be educated as to why the use of existing footpaths, trails, tracks and roads must be used only</li> <li>→ Do not allow for unauthorised establishment of access ways and roads across the farm</li> <li>→ Ensure areas around the tourism units are well managed to prevent damage and trampling in these areas</li> <li>→ Environmental Awareness through signage and site induction is key to ensuring that users are aware of the site sensitivities and ecological risks</li> <li>→ All invasive alien vegetation on the property must be removed within three years of any project approval, using proper methodology (see Martens et al 2021. Annual alien vegetation removal around all new units must be undertaken, so that these sites do not act as sources of alien spread.</li> <li>→ No plant species that are not locally indigenous may be planted around any of the new units.</li> <li>→ Rubbish, building rubble and household refuse must not be stored or disposed of outdoors on any of the sites as this may encourage spread of alien invasive Argentine ants. Rubbish and refuse should be kept indoors for responsible</li> </ul>	<ul style="list-style-type: none"> <li>-Monitor operations and users on site</li> <li>-Check areas around tourism overnight units for impacts or areas requiring rehabilitation</li> </ul>	Owner / operator / farm manager

		<p>disposal later, and building sites should be kept as free of rubble and building material as far as is possible, during construction and operational phases.</p> <p>→ Firebreaks should be brush cut annually around all isolated units, using handheld brush cutters. These firebreaks should extend from the edge of the building platforms outwards for at least 5m, and this brush cutting will then at least partially simulate regular fires in these areas within 5m of the buildings, whilst minimising likely fire damage to the infrastructure.</p>		
Freshwater / Wetland	<p>Impact 1 - Alteration of flow regime</p> <p>Impact 2 - Erosion and Sedimentation</p> <p>Impact 3 - Water quality impairment</p> <p>Impact 4 - Loss of biota</p>	<p>→ Collect rainwater off the roofs of the dwellings and store the water in rainwater tanks for domestic use.</p> <p>→ Collect rainwater off the roofs of the dwellings and store the water in rainwater tanks for domestic use.</p> <p>→ Ensure that the conservancy tank is appropriately sized (input should be obtained from a professional civils engineer and the calculation endorsed by the municipality).</p> <p>→ Formalise an operational agreement between the owner/s and the municipality/3rd party contractor that specifies the timing of tank emptying; and</p> <p>→ During the operational phase, monitor the site for any odorous liquids possibly being associated with a leaking sewerage system.</p>	<p>-Monitor operations and users on site</p> <p>-Check areas around tourism overnight units for impacts or areas requiring rehabilitation</p>	<p>Owner / operator / farm manager</p>

		<ul style="list-style-type: none"> <li>→ Ensure that the conservancy tank is appropriately sized (input should be obtained from a professional civils engineer and the calculation endorsed by the municipality).</li> <li>→ Formalise an operational agreement between the owner/s and the municipality/3rd party contractor that specifies the timing of tank emptying; and</li> <li>→ During the operational phase, monitor the site for any odorous liquids possibly being associated with a leaking sewerage system.</li> </ul>		
Faunal	Impacts associated with habitat loss or disturbance	<ul style="list-style-type: none"> <li>→ Switch lights off when not needed</li> <li>→ Add timers / sensors to lights</li> <li>→ Make lights activated by movement</li> <li>→ Add shields to lights</li> <li>→ Make lights shine downward, or direct only to where needed</li> <li>→ Use long wavelength red or amber lights / filtered amber LED, with no blue / minimal green light for outdoor lighted areas</li> <li>→ A lighting plan should be developed to ensure that the impact of night lights is kept to an absolute minimum</li> <li>→ Clearing of indigenous fynbos vegetation should be kept to an absolute minimum</li> <li>→ Avoid the establishment of invasive species</li> <li>→ Avoid trampling of natural fynbos vegetation surrounding developments</li> </ul>	Monitor for implementation of mitigation measures	Site Manager, Operator
Heritage	Heritage related impacts and risk of loss of heritage resources	<ul style="list-style-type: none"> <li>→ No archaeological mitigation is required prior to construction excavations commencing.</li> <li>→ No archaeological monitoring is required.</li> </ul>	Monitor for implementation of mitigation measures	Site Manager, Operator

		<ul style="list-style-type: none"> <li>→ Pending the exposure of significant new fossils (e.g. shelly invertebrates, well-preserved trace fossil assemblages) during construction, no further specialist paleontological studies are recommended here and there are no objections on paleontological heritage grounds to authorization of the proposed development (Almond 2024)</li> </ul>		
Noise	<p>Typical Noise impacts associated with the operation of a tourism facility</p> <p>Risk – disturbance to surrounding landowners and employees</p>	<ul style="list-style-type: none"> <li>→ Ensure noisy activities take place in line with municipal bylaw</li> <li>→ Ensure silencers are fitted to noisy machinery</li> <li>→ Machinery to be kept in good working order</li> </ul>	<ul style="list-style-type: none"> <li>-Monitor operations</li> <li>-Record and attend to any complaints received</li> <li>-Notify neighbours in close proximity during events or activities which may generate unusual traffic and noise</li> </ul>	Owner / operator
Visual	<p>Typical Visual impacts associated with the operational phase of a tourism venture</p> <p>Risk – visual impact of operation within landscape, landowners and users</p>	<ul style="list-style-type: none"> <li>→ Ensure infrastructure and dwellings are maintained on a regular basis i.e. gardens are tidy, lawns are cut, dwellings are painted, refuse areas are secured and tidy etc.</li> <li>→ Ensure any on site storage is kept tidy and secured to prevent spread by wind or rain</li> <li>→ Keep artificial lighting to a minimum</li> <li>→ Encourage good housekeeping to ensure daily operations result in a well-kept site</li> <li>→ Restrict operational activities to impacted areas only</li> </ul>	<ul style="list-style-type: none"> <li>-Monitor operations</li> </ul>	Owner / operator

<p>Job creation, skills transfers, investment in the areas</p>	<p>Job creation and skills transfer during operation  Risk – labour not sourced locally, therefore local benefit and skills transfer is limited</p>	<p>-Ensure labour and contractors are sourced locally as far as possible -Encourage educational opportunities to employees</p>	<p>-Ensure employees are sourced locally as far as possible by checking staff appointments -Encourage the use of local service providers as far as possible</p>	<p>Owner / operator</p>
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## 7.2. General operational impacts and requirements

### 7.2.1. Health and Safety

Responsibility – Owner / Operator

Correct Personal Protective Equipment (PPE) must be worn at all times by relevant personnel on site when required. Personnel must be trained on the use of PPE. Each contractor should employ their own Safety Officer to monitor the safety conditions during the operations. Suitable warning and information signage should be erected. The handling of hazardous materials should only be done by trained personnel. Safety Data Sheets (SDSs) must be readily available for all hazardous substances on site and employees should be aware of the risks associated with any hazardous materials used. All provisions of the Occupational Health and Safety Act (Act No. 85 of 1993) must be complied with. In the event of an emergency relating to a hazardous substance, procedure details in the SDSs should be immediately implemented.

General Health and Safety requirements for the operation of a tourism overnight offering must be implemented in line with the relevant legislation.

### 7.2.2. Fire risk management

Responsibility - Owner / operator

Rusty Gate already implements various actions relating to fire management and fire emergency preparedness:

- The current owners purchased Rusty Gate Mountain Retreat, including Farms 824, 826 and 887 in June 2019.
- In early 2020, Rusty Gate joined the GOFPA (Greater Overberg FPA) and with their assistance assessed and implemented fire risk mitigation and management procedures on site
- The property perimeter of Rusty Gate is approximately 13 km of which roughly half the length constitutes the boundary with Riviersonderend Nature Reserve. The northern boundary of approximately 4 km of Rusty Gate's property borders exclusively with the Riviersonderend Nature Reserve.
- One of the major concerns already identified in 2020 is that the veld and vegetation on the farm and surrounding properties last burned in approximately 2010, resulting in substantial fuel build-up and increased wild-fire risk.
- With the assistance of GOFPA, Rusty Gate actively engaged with Cape Nature from early 2020 to formalise a three-way firebreak agreement between the aforementioned parties and Boskloof Farm for collective management of and mitigation of wildfire risk, and specifically on the northern boundary of the property.
- A formal Firebreak Agreement was drafted by Rusty Gate for approval by Cape Nature and Boskloof Farm. The Firebreak Agreement also included a request for controlled block burning of vegetation on Rusty Gate's property to reduce the fuel load and risk of uncontrollable wildfires.
- By late 2021 Rusty Gate and Boskloof Farms were fully committed to the proposed Firebreak Agreement, but formalising the agreement was hampered by administrative and bureaucratic challenges at Cape Nature's legal department. Failure to formalise the proposed firebreak agreement led the three parties to a verbal agreement for the implementation of single fire break from Silverstream Dam (eastern extremity) via Rusty Gate to Boskloof Dam (western extremity) to be jointly maintained by the three parties and each party being responsible for the portion of the fire break on their land.



***Principles of fire management which have been considered in this application:***

Rusty Gate acknowledges that the proposed expansion of their tourism offering must include appropriate fire management strategies and prevent fire suppression. As such, the applicant is already in consultation with various specialists including Chris Martens (goFPA) and Sean Privett (Grootbos) regarding fire management and block burning on site to ensure that appropriate fire intervals are implemented and maintained during operations. It is important that the natural fire regime be allowed to proceed despite the proposed development. It is therefore proposed that an Integrated Fire and Alien Vegetation Management Plan be prepared for the site, as a condition of Environmental Authorisation. The principles of such a report, which are mostly already implemented, include:

- Implementation and maintenance of correctly planned fire breaks across the properties and at each new site
- Allowance for natural fire regimes
- Allowance for strategic block burning in line with specialist recommendations
- Suppression of fires which occur at increased frequencies
- Ongoing Alien vegetation clearing and management across the site

The properties are located within a high fire risk area for fire. In addition, fire is necessary for the ecological functioning of the fynbos.

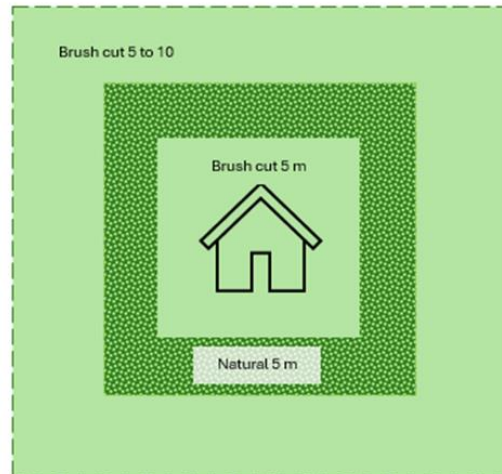
A Fire Officer must be identified, who shall be responsible for ensuring immediate and appropriate actions in the event of a fire and shall ensure that employees are aware of the procedure to be followed. The Fire Officer shall ensure that sufficient fire-fighting equipment is readily available on site at all times. Any fires or signs of fire must be reported to the fire officer immediately.

No open fires must be permitted and only designated braai facilities provided. Guests must be educated regarding the risk of fire and what to do in the event of a fire. Units should be equipped with at least the minimum firefighting equipment and made aware of its location and how to use it. Emergency contact numbers and procedures required in the event of a fire, must be made known to site guests.

Firebreaks should be brush cut annually around all isolated units, using handheld brush cutters. These firebreaks should extend from the edge of the building platforms outwards for at least 5m, and this brush cutting will then at least partially simulate regular fires in these areas within 5m of the buildings, whilst minimising likely fire damage to the infrastructure.

Along with the sprawled layout proposed, comes the concern regarding preclusion and / or suppression of fire in order to protect infrastructure. The ecological impact of excluding fire in a fire driven fynbos ecosystem, is significant. The Botanical specialist has highlighted the impact of the possible loss of the optimal natural fire regime, as an important indirect negative impact associated with the operational phase. Fire is a major risk to many of the proposed and existing units at Rusty Gate, and consequently, one would expect that it is likely to be suppressed and actively fought in the vicinity of any infrastructure. The impact of this means that areas around built infrastructure do not burn at the optimal 10 - 15-year fire interval, leading to long term loss of species diversity (Helme et al 2016). This botanical impact is likely to be of Medium negative significance before and after mitigation but may be less significant than this if wildfires overwhelm the defences and vegetation is burnt right up to most of the units, as is often the case these days. In the fire management strategy for Rusty Gate and with guidance from Cape Nature, provision has been made to allow natural fires to run their course as far as possible, particularly where the new units are proposed. The existing tourism and infrastructure have long since lost most of the natural vegetation around the units due to the clustered approach, and landscaping.

However, the aim is to keep the natural vegetation around the new proposed units in line with the vision for this tourism offering. Therefore, a specific type of fire break design will be applied to each unit. Overberg Municipality Protection Services, with support from Cape Nature, has recommended that a strip of 5 m wide must be brush cut around each unit. Then another strip of 5 m of natural / uncut vegetation must be provided around the outside of the brush cut area, and then finally another strip of 5 to 10 m of brush cut area provided around the natural strip on the outside. This method has been found to be effective in protecting infrastructure whilst still allowing the fire to burn right to the units.



The aim of the above is to ensure that the proposed development will not hinder the natural fire regime at Rusty Gate. Along with this, the additional mitigations relating to design and use of fire-retardant materials, the existing internal access roads and fire breaks and the Fire Management Plan and Fire Agreement we feel that the both the risk of fire and the need to allow fire in its natural cycles have been adequately considered in the proposal. A formal integrated Fire and Alien Vegetation Management Plan will be drafted for Rusty Gate as a condition of authorisation, which will include all these principles.

The first block burn will take place in November 2024, followed by another in April 2025, as per the approved plan below:

The land management relative to fire will also be further secured via the proposed Open Space 4 zoning and Nature Reserve Status proposed as well as the various requirements mandated under the Cape Nature Stewardship programme. Along with the above, the rehabilitation of the old orchards will also take place in order to reinstate the natural habitat of the area (Alternative 2 – Preferred).

### 7.2.3. Fuels and hazardous materials

Responsibility - Owner / operator

Fuels and flammable materials which may be required on site during operation, are to be suitably stored in a designated area. Impervious materials are to be used in these storage areas to prevent contamination of the ground in the event of spillages or leaks. Quantities of fuels and hazardous materials stored on site should be appropriate to the requirement for these substances on site.

### 7.2.4. Erosion Control

Responsibility - Owner / operator

Action should be taken to prevent erosion of soils on site. Should any erosion be detected on site, the cause of such erosion should be identified, and appropriate remedial action must be immediately implemented.

#### 7.2.5. Architecture / Design

Responsibility - Owner / operator

Dwellings and infrastructure to comply with bylaws. Owners should aim to ensure buildings are in line with architectural norms for the area and do not have a negative contribution to the area as a whole

#### 7.2.6. Water Use

Responsibility – Owner / operator

The following water saving principles are recommended for the site and can be implemented over time or as and when current infrastructure requires replacing:

- Rainwater storage tanks can be installed to collect runoff rainwater. Rainwater tanks should be installed in such a way as to prevent visual or landscape intrusion
- Shower and wash basin taps should be fitted with flow reduction devices, aerators and motion sensors to maximise water conservation and reduce wastage
- All internal and external taps on site should be regularly inspected and maintained to prevent water wastage through drips and leaks
- All new toilets should be fitted with a dual flush system, reduced flow should be implemented on existing infrastructure if dual flush is not possible
- Endemic and indigenous plants should be used for gardens and landscaping to minimize water demand i.e. water wise landscaping
- Should irrigation be required, these should be on timed systems and active at low evaporation hours (early morning, late evening)
- Drains should be fitted with grease traps which remove oils and solids from wastewater, to improve the quality of the effluent waste water for reuse
- Dry brushing and / or sweeping should be used in preference to water cleaning, where possible (cleaning pathways, machinery etc.)
- Alien invasive vegetation should be removed from the property to promote healthy and functioning rivers, ground water and wetlands, where applicable
- Efficient water use habits should be encouraged across the property
- Sewerage systems should be regularly monitored and maintained to prevent leaks and pollution of groundwater

#### 7.2.7. Electricity

The following electrical saving principles are recommended:

- Regular light bulbs to be replaced with energy saving bulbs in all structures
- The use of solar power should be maximised as far as possible
- Energy saving geysers should be installed / Solar water heaters should be installed
- Proper insulation should be used on all new structures and renovations, in order to reduce the need for heating and cooling of dwellings
- Programmed lighting should be implemented to prevent lights being left on unnecessarily

### 7.2.8. Sewerage

Closed conservancy tanks are applicable. These should be fitted with float level alarms, which signal at 75% in order to provide sufficient time to service the tank. The areas around these tanks and pipelines should be inspected on a regular basis to check for signs of malfunctioning or leaks.

### 7.2.9. General waste and refuse

General waste must be transferred to a central waste site from where it will be transferred to the municipal waste transfer station. This must be a licensed facility. Waste minimisation strategies must be implemented through avoidance, reduction, reuse, recycling, recovery, treatment or responsible disposal. On site bins must be animal and weatherproof. Refuse areas should be secure and screened to avoid visual impacts. Refuse areas should provide for waste sorting (tins, glass, paper etc.). No waste should be stored or disposed of on site.

### 7.2.10. Site maintenance and repairs

Renovations and maintenance should be conducted in line with a maintenance schedule to ensure that renovations are done effectively with reduced wastage. When using paints, cleaners and other solvents for maintenance, preference should be made for environmentally friendly products, water-based paints and avoidance of harsh chemicals. No building materials or products used during renovations should be disposed of on site.

### 7.2.11. Alien vegetation management

A site wide Alien Management Plan must be drafted for the farm and targets set for performance. The impact of alien and invasive vegetation on endemic fynbos is material and an ongoing challenge for all affected landowners. The most prominent invasive species found at Rusty Gate includes Hakea, Pine trees Myrtle in specific limited locations, and more recently "Paterson's Curse".

Various actions in terms of alien vegetation clearing have been undertaken on Rusty Gate to date and will continue:

- Ongoing clearing activities around infrastructure and buildings, hiking trails and other regularly used areas of the farm.
- Dedicated clearing activities at least twice per annum in all other accessible areas of the property not mentioned above.
- Clearing of invasives in inaccessible areas with assistance from Working for Water's High-Altitude team located in Genadendal when they conduct clearing in adjacent areas of the Riviersonderend Nature Reserve for Cape Nature.
- "Project based" clearing of designated areas, e.g. Removal of all large (mature) pine trees planted or left to grow by previous owners at various locations on the farm, clearing of Hakea "clusters" found at remote areas of the farm, Removal of Myrtle hedgerow close to the farm's main entrance and seasonal work on eradicating Paterson's Curse, including weeding and pre-flowering slashing.
- As outlined in the fire section above, alien vegetation management forms an integral part of fire risk management and preparedness.

#### 7.2.12. Internal roads and footpaths

Access is already in place. No new hiking trails, footpaths and access routes are permitted without prior approval. Guests must be educated regarding this.

#### 7.2.13. Fauna

All wild fauna on site should be protected. No feeding of wild animals is permitted and edible refuse should be appropriately disposed of. No poisons or traps should be used as far as possible. Professional help, such as Cape Nature, should be contacted for 'problem' animals.

### 8. NON-COMPLIANCE

The Environmental Authorisation (EA) stipulates that, *"Non-compliance with a condition of this Environmental Authorisation and the EMP may render the holder liable to criminal prosecution."* It is therefore important that the conditions are adhered to as outlined in the EA and EMP. A Penalties scheme can be used during construction for transgressions.

Transgressions relate to actions by the contractor whereby damage or harm is inflicted upon the environment or any feature thereof and where any of the conditions or specifications of the EMP and EA have been infringed upon. In the instance of environmental damage, the damage is to be repaired and rehabilitated using appropriate measures, as far as possible and as directed by appropriate specialists, if required. These remedial actions are for the account of the contractor or other guilty party as identified by the Project Manager, applicant or ECO. Where non-repairable damage is inflicted upon the environment or non-compliance with any of the EMP / EA obligations is registered, the Contractor may face a monetary penalty to an amount specified by the Project manager / ECO. The Project manager / ECO reserves the right to implement a first offence warning.

If excessive infringement with regard to any of the specifications is registered, the applicant / project manager, reserves the right to terminate the contractor's contract.

### 9. COMPLIANCE AND MONITORING

The monitoring of works on site is necessary to demonstrate compliance with the specifications of the EMP and EA and to allow for problems or issues of non-compliance to be identified and remedial actions implemented.

Monitoring should include visual checks by the owner / operator / ECO, as applicable, on a regular basis. The implementation of regular monitoring will ensure that environmental impacts can be detected early and remedial action implemented. The following activities need regular monitoring:

- Mitigation measures and conditions of authorisation must be implemented in the long term
- Actions which impact negatively on the wetland, watercourses or sensitive botanical areas across the properties
- Landscaping is limited to allow natural vegetation to thrive
- Water saving principles are being implemented and adhered to
- Refuse areas are tidy and no refuse is visible on or around the property
- Stockpiles are screened and kept for bare minimum
- Buildings are maintained on a regular basis and in line with architectural character of the area
- Riverbanks and watercourses are not negatively impacted by daily activities on site

### **9.1. Environmental control sheets**

Environmental Control Sheets to be used by the ECO / operator / responsible person on a monthly basis (or as required), to monitor operational activities to ensure compliance with recommendations. The responsible person should familiarise themselves with the full set of recommendations for the site and reasons for these recommendations, as well as understand the site and constraints analysis and be able to identify the constraints / No Go areas. This person should also be aware of the mitigation measures and conditions of authorisation.

**Table 3.** Environmental Control Sheets for operation

					RECORD OF PERFORMANCE		
TASK	ACTION REQUIRED / MITIGATION & METHOD FOR IMPLEMENTATION	FREQUENCY	TARGET / OUTCOME	RESPONSIBILITY	COMPLETED YES/ NO	DATE	COMMENT
<b>OPERATION</b>							
Water use	<ul style="list-style-type: none"> <li>- Ensure irrigation is done in a waterwise manner</li> <li>- Only indigenous vegetation for landscaping</li> <li>- Waterwise planting</li> </ul>	As required	Waterwise	Operator / Management / ECO			
Noise	<ul style="list-style-type: none"> <li>- Ensure noisy activities take place in line with municipal bylaw</li> <li>- Ensure silencers are fitted to noisy machinery</li> <li>- Machinery to be kept in good working order</li> <li>- Generators to be located in generator rooms to dampen the sound</li> </ul> <p>METHOD: Check the implementation of mitigation measures</p>	As required	No impacts to adjacent landowners	Operator / Management / ECO			
Job creation, skills transfer, invest on the area	<ul style="list-style-type: none"> <li>- Ensure labour and contractors are sourced locally as far as possible</li> <li>- Encourage educational opportunities to employees</li> <li>- Encourage patrons to visit other local and surrounding tourism offerings</li> </ul> <p>METHOD: Include in contract documents and business model</p>	As required	Maximise jobs for local communities Investment in the local economy	Operator / Management / ECO			
Health & Safety	<ul style="list-style-type: none"> <li>- Appoint officer as required</li> </ul> <p>METHOD: Appoint H&amp;S steward</p>	As required	Avoid / prevent H&S incidents	Operator / Management / ECO			

Fire	<ul style="list-style-type: none"> <li>- Implement fire management requirements as outlined in the EMP</li> </ul> <p>METHOD: Appoint Fire Officer / chief, implement recommendations of management plan</p>	As required	Avoid / prevent fire incidents	Operator / Management / ECO			
Fuels and hazardous material	<ul style="list-style-type: none"> <li>- To be suitably stored</li> <li>- Bulk deposits to be banded</li> </ul> <p>METHOD: Inspect on a regular basis</p>	As required	Avoid / prevent spills and leaks	Management / ECO			
Erosion	<ul style="list-style-type: none"> <li>- Monitor construction and rehabilitated areas</li> </ul> <p>METHOD: Inspect on a regular basis</p>	As required	Prevent erosion	Management / ECO			
Water	<ul style="list-style-type: none"> <li>- Monitor for water wastage (dripping taps, leaking pipes etc)</li> </ul> <p>METHOD: Implement water saving measures</p>	As required	Reduce water usage and introduce water saving principles	Management / ECO			
Electricity	<ul style="list-style-type: none"> <li>- Monitor electricity usage</li> </ul> <p>METHOD: Implement electrical saving measures</p>	As required	Reduce electrical consumption	Management / ECO			
Sewage and sewerage infrastructure	<ul style="list-style-type: none"> <li>- Check areas surrounding sewage tanks for signs of eutrophication and leaking tanks</li> <li>- Install 75 % float level alarm to indicate when provision needs to be made to empty tanks</li> </ul> <p>METHOD: Monitor for spills and leaks from conservancy tank, install and monitor float level alarms</p>	As required	Avoid sewerage spills and contamination	Management / ECO			
General waste and refuse	<ul style="list-style-type: none"> <li>- Implement recycling and reuse as far as possible</li> <li>- Ensure waste storage areas are in line with requirements to prevent adverse impacts on people, the environment and animals</li> </ul> <p>METHOD: -Monitor waste disposal areas</p>	As required	A clean site, with reuse and recycling encouraged	Management / ECO			
Site management and renovations	<ul style="list-style-type: none"> <li>- Renovations and maintenance should be conducted in line with a maintenance schedule to ensure that renovations are done effectively with reduced wastage. When using paints, cleaners and other solvents for maintenance, preference should be made for environmentally friendly products, water-based paints and avoidance of harsh chemicals. No building</li> </ul>	As required	An aesthetically pleasing site with schedule maintenance as required	Management / ECO			



	materials or products used during renovations should be disposed of on site						
Alien vegetation management	<ul style="list-style-type: none"> <li>- Remove alien vegetation from the property to allow for the regeneration of indigenous species in line with an Alien Management Plan</li> </ul> METHOD: Implement Alien Management Plan	As required	A quality site reduce alien vegetation seedbank	Management / ECO			
Fauna	<ul style="list-style-type: none"> <li>- No feeding of wild animals</li> <li>- No killing of wild animals</li> </ul> METHOD: Seek professional assistance for 'problem' animals	As required	Functional ecological corridors and remainder which does not harm fauna	Management / ECO			
Wetland	<ul style="list-style-type: none"> <li>-Monitor health and extent of the wetland</li> <li>-Ensure guests and operational activities do not extend into wetland areas</li> <li>-Ensure mitigation measures indicated by the specialist are implemented and adhered to</li> </ul>	Often	Functional wetlands which contributes to the broader wetland systems and ecological functioning of the area	Management / ECO			

## 10. ENVIRONMENTAL AUDITS

The purpose of auditing is to determine and monitor compliance with the EMP and EA and measure its effectiveness in mitigating environmental impacts. In terms of Regulation 34 of the NEMA EIA Regulations, 2014, the holder of the EA must conduct environmental audits in order to determine compliance with the conditions of the EA and EMP. Environmental Audit Reports should be submitted to the Competent Authority or as stipulated in the EA. The audit reports should be prepared by an independent person. The audit report should also provide recommendations regarding the need to amend the EMP.

The objective of the environmental audit report is to:

- Report on the level of compliance with the conditions of the EA and the EMP
- Report on the extent to which the avoidance, management and mitigation measures outlined in the EMP, achieve the objectives and outcomes of the EMP
- Identify and assess any new impacts and risks as a result of the activity
- Evaluate the effectiveness of the EMP
- Identify shortcomings in the EMP
- Identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMP

An environmental audit report should contain the following:

- Details and expertise of the independent person who prepared the environmental audit report
- A declaration that the auditor is independent
- An indication of the scope of, and the purpose for which, the environmental audit report was prepared
- A description of the methodology adopted in preparing the environmental audit report
- An indication of the ability of the EMP to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity as well as to ensure compliance with the provisions of environmental authorisation and EMP.
- A description of any assumptions made, and any uncertainties or gaps in knowledge
- A description of any consultation process that was undertaken during the course of carrying out the environmental audit report, if required
- A summary and copies of any comments that were received during any consultation process
- Any other information requested by the competent authority.

Environmental audits are not likely to be undertaken for the current operational activities due to the nature of the activity.

## 11. CONCLUSION

An EMP has been developed as part of the Basic Assessment process to ensure that mitigation and management measures are enforced during the operational phase of the activity, and that the conditions of the EA are upheld. The EMP should guide all phases of the project to minimize possible negative impacts and assign responsibility for environmental controls. The EMP provides a tool to recognise the needs of the environment and is intended to be utilised in conjunction with the Environmental Authorisation.

**12. DECLARATION OF ACCEPTANCE**

I, \_\_\_\_\_ (name), representing  
\_\_\_\_\_ (company name), have read and  
understood the above Environmental Management Plan and hereby acknowledge its contents and requirements  
as a framework for the environmental performance during the operational phase of the development.

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

APPENDIX A : PREFERRED LAYOUT PLAN

