



FINAL ENVIRONMENTAL AUDIT REPORT

DEA&DP 16/3/1/5/D6/28/0011/13

Prepared For

Pinnacle Point
Home Owners
Association
(PPHOA)

Prepared By

Cimarron Consultants (Pty) Ltd

☎+27 82 875 6800

✉esca@cimarroncoaching.co.za

REVISION AND AMENDMENTS

Revision date	Revision number	Description
31/10/2025	Original document	Draft audit report
6/11/2025	Revision 1	Draft audit report submitted to DEADP
18/03/2026	Revision 2	Draft audit report: Updated to incorporate management outcomes and agreed actions, proposed amendments to the Environmental Management Programme (EMPr) following the meeting with DEADP on 17 March 2026, and the proposed Public Participation Plan.
17/07/2026	Revision 3	Final audit report (Including Comments and Response Report)

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Public Participation Plan

LIST OF ABBREVIATIONS

ACMP	Archaeological Conservation Management Plan
ARC	Architectural Review Committee
CA	Competent Authority
CARA	Conservation of Agricultural Resources Act 43 of 1983
CBD	Central Business District
CEMP	Construction Environmental Management Plan
CODEV	Conservation and Development Facilitation Services
DAFF	Department of Agriculture, Forestry and Fisheries
DEA&DP	Department Environmental Affairs & Development Planning
DWS	Department of Water and Sanitation
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
ECO	Environmental Conservation Officer
EIA	Environmental Impact Assessment
ELC	Environmental Liaison Committee
EM	Environmental Manager
EMPR	Operational Environmental Management Plan
FMP	Fire Management Plan
GA	General Authorisation in terms of section 39 of the National Water Act, (Act 36 of 1998) within the Gouritz Water Management Area
GM	General Manager
GMG	Game Management Guideline
GTUP	Game Translocation and Utilization Policy
HWC	Heritage Western Cape
I&AP	Interested and Affected Party
IDP	Integrated Development Plan
IFBP	Integrated Fire Burning Plan
MAPCRM	Mossel Bay Archaeology Project Cultural Resource Management
NEMA	National Environmental Management Act, Act 107 of 1998

NEM:BA	National Environmental Management: Biodiversity Act(Act 10 of 2004)
PoHO	Point of Human Origin
PPHOA	Pinnacle Point Home Owners Association
PPSC	Pinnacle Point Site Complex
ROD	Record of Decision
TM	Technical Manager
SAHRA	South African Heritage Resources Agency
SCFPA	South Cape Fire Protection Agency
UNESCO	United Nations Educational, Scientific and Cultural Organisation
WESSA	Wildlife and Environmental Society of South Africa
WHS	World Heritage Site

EXECUTIVE SUMMARY

This report presents the findings of the 2025 Annual Environmental Audit for the Pinnacle Point Residential Golf Resort Development in Mossel Bay, South Africa, conducted by Cimarron Consultants (Pty) Ltd on behalf of the Pinnacle Point Home Owners Association (PPHOA).

The audit assesses compliance with the Environmental Authorisation (EA) (Ref: 16/3/1/5/D6/28/0011/13), originally issued in 2003 and transferred to PPHOA in 2013, together with the approved Operational Environmental Management Programme Report (EMPr)(Ref EG 12/2/1/74/3865(B)) dated 27 August 2014.

The development is in its operational phase and comprises an 18-hole golf course, residential units and associated infrastructure across approximately 4.51 km². Construction activities are limited to the completion of the remaining 98 residential dwellings in accordance with the approved development layout.

The audit was undertaken in accordance with Regulation 34 and Appendix 7 of the National Environmental Management Act (NEMA) Environmental Impact Assessment Regulations, 2014 (as amended). The assessment included a review of relevant documentation, a site inspection conducted on 21 October 2025, interviews with key personnel, and an evaluation of compliance against 39 Environmental Authorisation conditions and 159 commitments contained in the approved EMPr, including its appendices and associated management plans.

The Draft Environmental Audit Report and Public Participation Plan were submitted to the Department of Environmental Affairs and Development Planning (DEA&DP) for review. On 27 May 2026, DEA&DP (Directorate: Development Management, Region 3) acknowledged acceptance of the Public Participation Plan (Reference: 16/3/3/6/5/D6/28/0424/25) and confirmed the public participation requirements. These included a 30-day public review period (9 June 2026 – 15 July 2026) and submission of proof of the public participation process with the Final Environmental Audit Report. These requirements were fulfilled, and

the supporting documentation is included in the Comments and Response Report (Appendix E).

Compliance was assessed using the following rating system: Fully Compliant (4), Partially Compliant (2), Non-Compliant (0), Not Applicable (N/A), and Scored Elsewhere (SE) (refer to Table 1).

Four (4) comments were received during the public participation process. The comments received during the public participation process, together with the supporting information submitted by the Estate, resulted in the identification of one procedural non-compliance relating to environmental incident/complaints management and one additional partial compliance finding relating to erosion management. These findings have been incorporated into the final audit report

The audit found a high level of overall compliance. Of the 36 applicable Environmental Authorisation conditions, 35 were assessed as fully compliant and one as partially compliant. Of the 107 applicable EMPr commitments, 81 were fully compliant, 23 partially compliant and three(3) non-compliant. A separate assessment of the Department of Water Affairs General Authorisation, comprising 11 applicable conditions, found nine conditions to be fully compliant and two partially compliant.

Table 1: Summary of compliance evaluations of total conditions in each document

Document	Total conditions listed (TCL) TCL = FC+PC+NC+N/A+SE	Total conditions evaluated (TCE) TCE=TCL-N/A-SE	FC -4	PC -2	NC 0	N/A	SE
EA	39	36	35	1	0	3	0
EMPR	159	107	81	23	3	9	43
EA+EMPR	198	143	116	24	3	12	43
GA	11	11	9	2	0	0	0

The audit recommends actions to address the identified non-compliances and partial compliances, and propose amendments to the approved EMPr.

PPHOA has demonstrated a strong commitment to environmental stewardship through proactive environmental management and the implementation of sustainable operational practices. Its continued commitment to maintaining the environmental objectives of the development provides a positive example of responsible environmental management within residential estates.

1. INTRODUCTION

On 29 October 2003 the Department of Environmental Affairs & Development Planning (DEADP) issued the environmental authorisation (Ref: EG12/2/1-74- Erf 2001 & Erf 3438 Pinnacle Point Golf Estate 38859) to Pinnacle Point Resort (Pty) Ltd.

Although issued to Pinnacle Point Resort (Pty) Ltd initially, the environmental authorisation (EA) was successfully transferred to the Pinnacle Point Home Owners Association (PPHOA) on 9 October 2013 (Ref: 16/3/1/5/D6/28/0011/13) after the Pinnacle Point Resort (Pty) Ltd, liquidation in November 2011, making the PPHOA responsible for compliance with the EA and implementation of the approved operational environmental management plan (hereafter referred to as EMPR). The funding for managing the estate, including the implementation of this EMPR and associated appendices and management plans, is provided through levies collected from the homeowners.

The EMPR was approved on 27 August 2014, by the Department Environmental Affairs & Development Planning (DEA&DP) with reference number EG12/2/1/74/3865(B), and it's the current approved EMPR for the development. The EMPR was revised in 2019; however the process was not completed and the version was not approved. This audit was conducted on the approved EMPR. The project is currently in the operational phase.

The EA doesn't specify a frequency for conducting environmental audits; the approved EMPR stipulates annual environmental audits. This environmental audit report is the 4th (fourth) – annual environmental audit report for Pinnacle Point Residential Golf Resort Development and fulfils the requirements of the 2025 annual environmental audit report, as per the requirements of the EA and EMPR.

The audit is undertaken in accordance with Regulation 34 and Appendix 7 of the National Environmental Management Act, Act 107 of 1998 (NEMA) Environmental Impact Assessment (EIA) Regulations, 2014. Regulation 34 states:

1. *“The holder of an environmental authorisation must, for the period during which the environmental authorisation and EMPR, and where applicable the closure plan, remain valid-*
 - a. *Ensure that the compliance with the conditions of the environmental authorisation and*

- the EMPR, and where applicable the closure plan, is audited; and*
- b. Submit an environmental audit report to the relevant competent authority.”*
2. *The environmental audit report contemplated in sub-regulation (1) must-*
- a. be prepared by an independent person with the relevant environmental auditing expertise;*
 - b. provide verifiable findings, in a structured and systematic manner, on*
 - I. The level of performance against and compliance of an organisation or project with the provisions of the requisite environmental authorisation or EMPR and, where applicable, the closure plan; and*
 - II. The ability of the measures contained in the EMPR, and where applicable the closure plan, to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity;*
 - c. contain the information set out in Appendix 7; and*
 - d. be conducted and submitted to the competent authority at intervals as indicated in the environmental authorisation. “*

1.1 DETAILS OF THE HOLDER

Table 2: Details of the holder

Company name	Pinnacle Point Beach and Golf Resort Home owners association(PPHOA)
Company registration	2004/021284/08
Company address	PO Box 1790, Mossel bay, 6500
Telephone number	044 606 5300
General Manager	Carl van der Linde (carvdl@pinnaclepointestate.co.za)
Environmental Manager	Juditte van Dyk (juditte@pinnaclepointestate.co.za)
Golf Superintendent	Konrad Suhr (konrad@pinnaclepointestate.co.za)

1.2 PROJECT DESCRIPTION

Pinnacle Point Residential Golf Resort Development, Mossel Bay is made up of privately owned and municipal land situated on a Portion of Remainder Erf 2001 and Erf 3438 immediately west of Mossel Bay in the Southern Cape. The site is located adjacent and to the south of the Pinnacle Point Casino (Garden Route Casino), approximately 6km west of the Mossel Bay central business district (CBD), between the townships of Mossel Bay and Dana Bay, along the Indian Ocean. The site is approximately 4.51 km² in extent with a coastline frontage of approximately 3,8km. Refer to the location map in figure 1.

The EA permitted the development of an 18 hole championship golf course with ancillary facilities, 500 residential units, a 300 hotel rooms in one or more establishments, with

conference, sport, health, leisure and entertainment facilities, resort management / operational facilities, open space and conservation areas, including the associated infrastructure. It also permitted a temporary contractor's campsite to be erected where fuel were stored in aboveground tanks for the duration of the construction phase. See below in figure 2 a recent google image showing the layout.

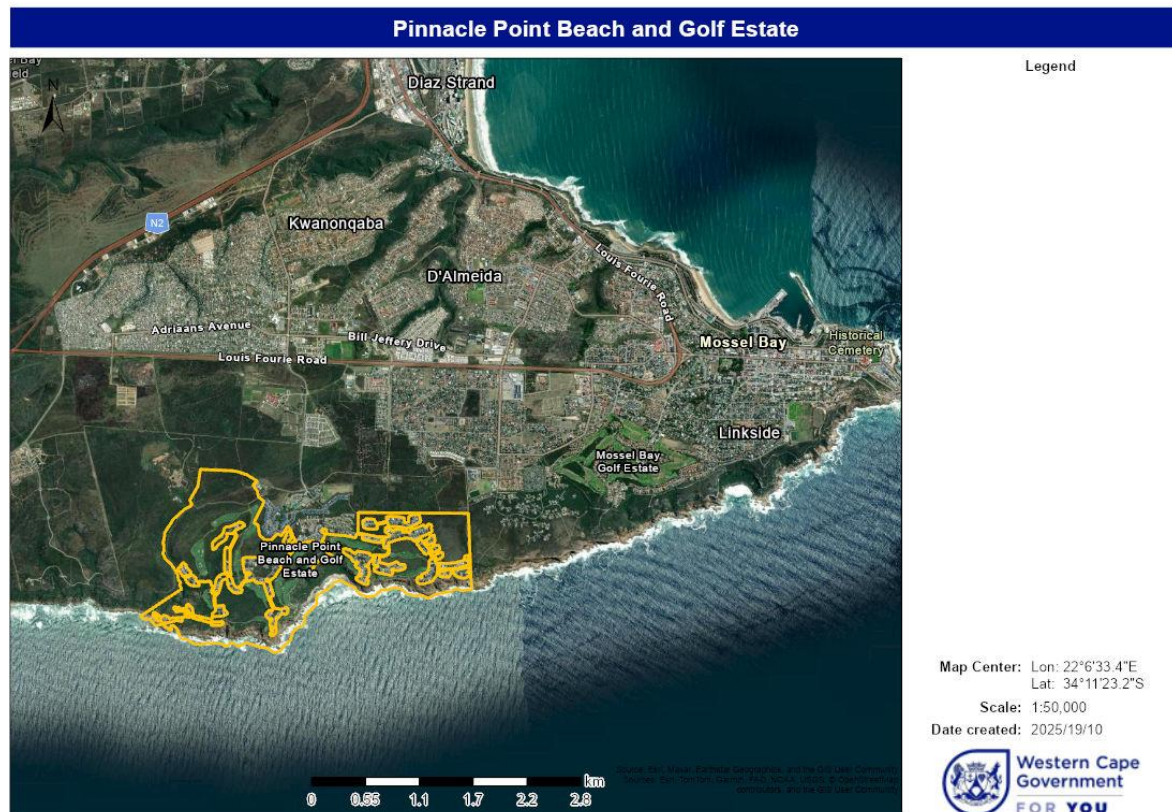


Figure 1: Pinnacle Point Beach and Golf Estate Location Map

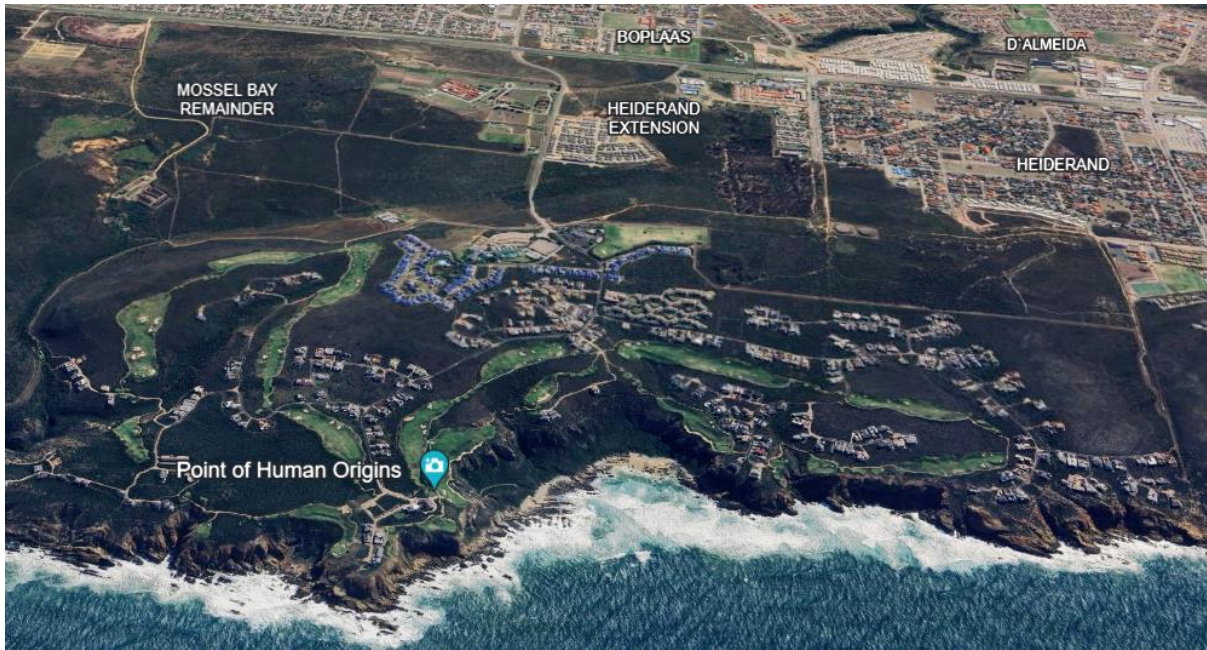


Figure 2: Google Image showing Pinnacle Point Beach and Golf Estate Layout

1.3 SUMMARY OF ACTIVITIES UNDERTAKEN DURING THE REPORTING PERIOD

It seems from previous audits that the main construction ended between August 2006 and October 2006. Two external construction audit reports are available at the PPHOA office. Construction audit report (July 2005) by Nelson Mandela University & Post construction audit report (June 2007) by Errol Cerff Environmental Management consulting.

The project is currently operational, and the operations-phase Environmental Management Programme Report (EMPR) is applicable. Of the total 406 erven planned (see figure 3: Site Development Plan dated 18 August 2003), 316 have already been developed. The remaining 88 erven and 10 units on erf 407 are yet to be developed, as indicated by the black dots in figure 4: Current Estate Map. The only ongoing construction activities involve the building of 98 dwellings, as detailed in table 3 below.

These must sought compliance with the recommendations of the construction environmental management plan (CEMP). The CEMP requirements has been incorporated into the following documentation, architectural guideline, landscape guidelines, stormwater management policy guideline, building rules and HOA house rules . Property owners who wish to construct new dwellings have to comply with these documents and these are signed

off by the PPHOA before commencement of any construction activities

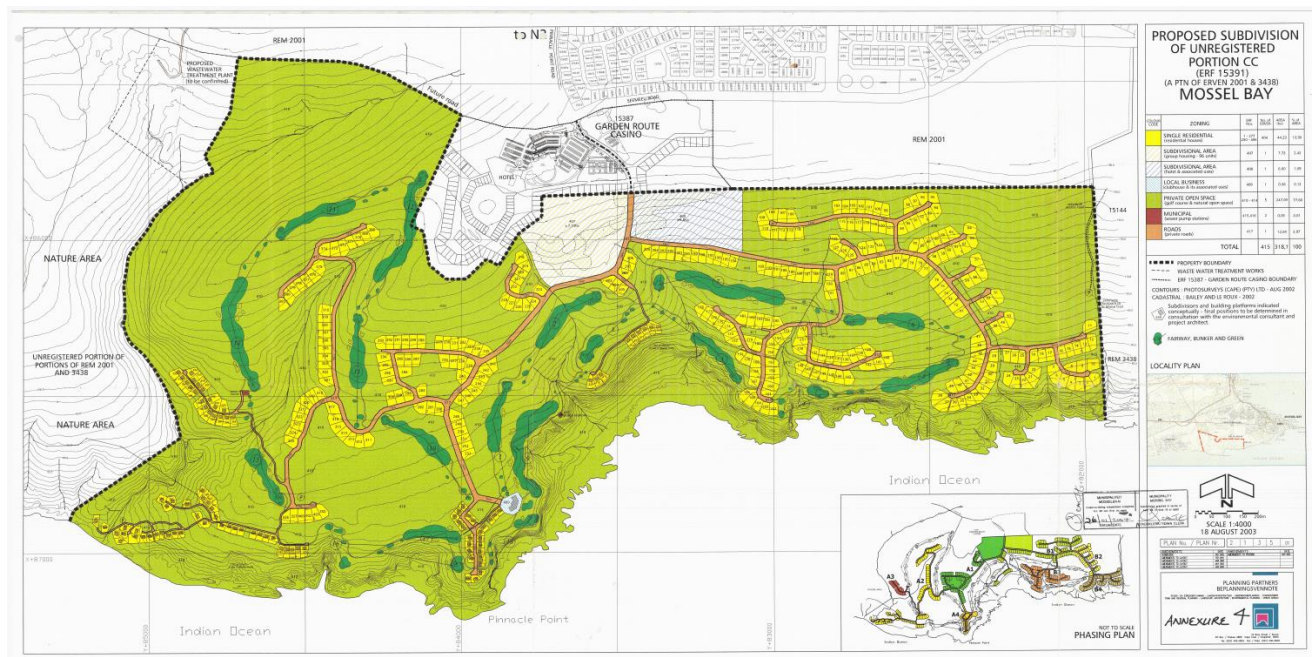


Figure 3: Site Development Plan 18 August 2003

Table 3: Development Status

As per Site Development Plan (18 August 2003)	Current Development Status
Sub divisional Area Erf no 408	All Completed
Sub divisional Area (96 units) Erf no 407	Ten (10) Units to be developed
Single Residential (404 Erven) Erf 1-277 and 280 - 406	Eighty Eight (88) Dwellings to be developed



Figure 4: The Current Estate Map shows black dots where dwellings are yet to be developed.

1.4 LISTED ACTIVITIES

At the time of the original authorisation, listed activities were regulated under the Environmental Conservation Act (ECA), Act No. 73 of 1989, specifically through the EIA Regulations amended in May 2002. These regulations remained in effect until July 2006, when they were superseded by the framework under the National Environmental Management Act (NEMA), Act No. 107 of 1998.

By 2013, environmental authorisation requirements were governed by NEMA through Listing Notices GNR 983, GNR 984, and GNR 985, published in Government Gazette No. 38282 on 4 December 2013, under Sections 24(2) and 24D of NEMA. As of 2025, this regulatory framework remains unchanged. Table 4 lists the approved listed activities.

Table 4: Listed activities and development components

Activity No(s):	Schedule 1 of Government Notice No. R1182 of 5 September 1997, as amended being	Describe the portion of the proposed development to which the applicable listed activity relates.
1(c)	The construction, erection or upgrading of – with regards to any substance which is dangerous or hazardous and is controlled by legislations (i) Infrastructure, excluding roads and rails, for the transportation of any such substance; and (ii) Manufacturing, storage, handling, treatment or processing facilities for any such substance.	Fuel/diesel storage infrastructure – completed
1(m)	The construction or upgrading of public and private resort, and associated infrastructure	Private resort – 406 erven developed, 98 dwellings yet to be developed
2(c)	The change of land use from agricultural or undetermined use to any other land use	Confirmed zoning changes per Mossel Bay Municipality (See figure 5 zoning map) Development Zones • Open space II • Single residential Zone I • General Residential Zone III • Transport Zone III • Special Zone • Business Zone I Open Spaces/Leased Spaces (Refer to figure 6) • Erf 2001 (135 ha) – Leased Area A – Open Space II (Private) – Still valid • Erf 2001 (62 ha) – Leased Area C – Open Space II (Private) - Renewed • Erf 15390 (118.3 ha) – Leased Area B – Open Space III (Nature Conservation) - Renewed

The remaining construction of dwellings does not affect the applicability of the EMPR, as the project is proceeding in accordance with its original environmental conditions. The points below demonstrate that the development continues to comply with the originally authorised listed activities.

- **Timing of Construction:** The bulk of construction was completed before the regulatory transition in 2006, which is significant because it means the development was subject to earlier legislation (pre-NEMA 2006 amendments), under which it was approved.

- **Approved Site Development Plan:** The erven layout from the 18 August 2003 site development plan was officially approved by Mossel Bay Municipality on 26 January 2004, covering the establishment of the development across multiple erven, confirming legal alignment with planning regulations. The houses have been constructed in accordance with the Surveyor General's plans for plot registration, and the development of existing plots is in furtherance of the registration and development of the remaining undeveloped plots.
- **Completion of Listed Activities (Refer to Table 4):**
 - Activity 1(c) - Storage of dangerous goods – this was used for fuel storage during the main construction and has been completed by October 2006.
 - Activity 1(m) - Construction of the resort and infrastructure - was largely completed by October 2006, before the regulatory shift; reinforcing that it was lawfully initiated and executed.
 - Activity 2 (c) – Change of land use from agriculture to any other land use – zone changes from agriculture to other land uses, zoning has been confirmed by the municipality. Refer to table 5 as well as figure 6 zoning map.
- **No Substantive Changes:** The remaining dwellings are being built according to the original plan and environmental conditions.
- **Land Use Confirmation:** The change in land use aligns with listed activity 2(c), and zoning has been confirmed by the municipality, supporting the legal consistency of the development. Zoning and land use changes remain consistent with the original authorisation. Lease agreement of Erf 2001, +/- 60 ha, and Lease agreement of portion of Erf 15390 (previously a portion of Erf 2001), +/- 118.3ha, has been renewed with effect from 1 August 2023 for 9 years and 11 months.

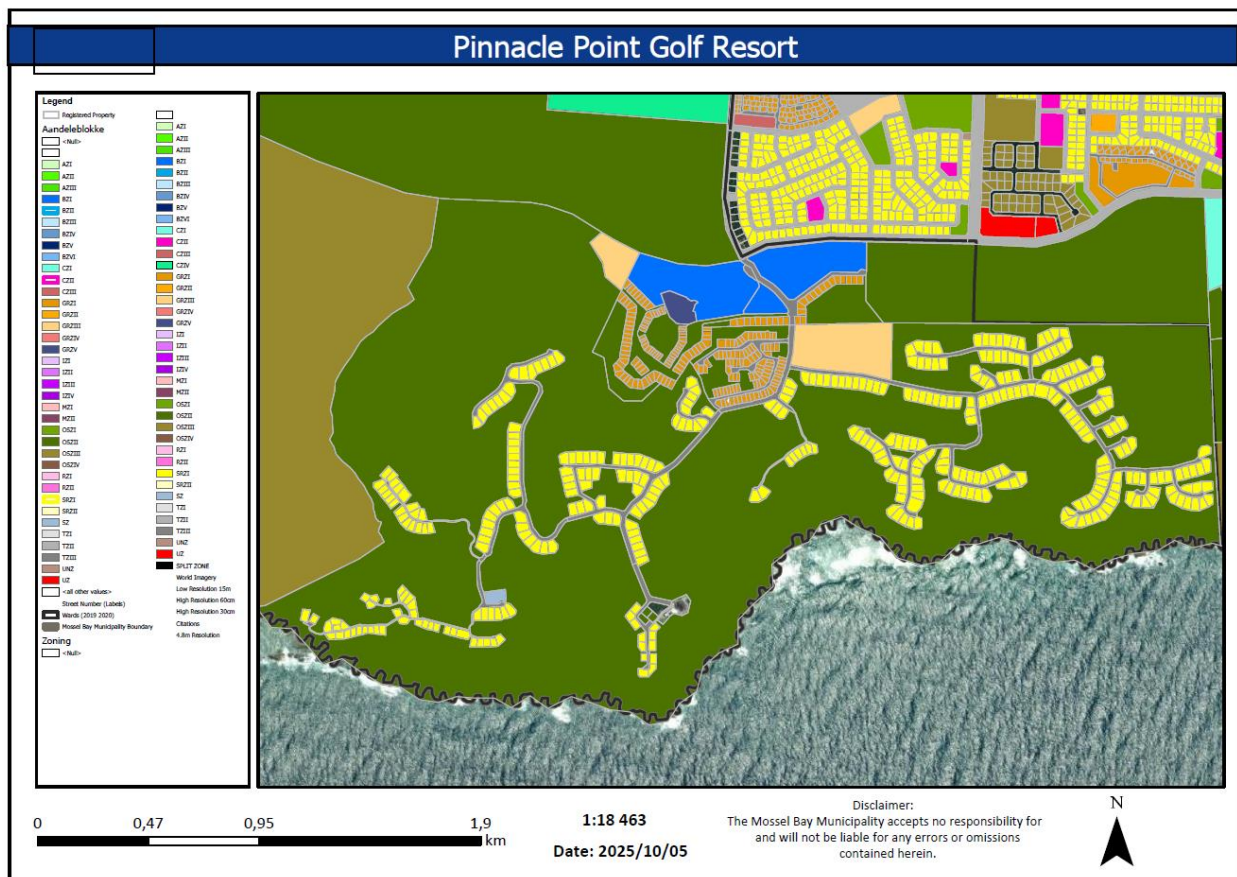


Figure 5: Zoning map



Figure 6: Leased areas, size and zoning

The auditor has reviewed and verified the key decision factors outlined in the Record of Decision (ROD) and Environmental Authorisation (EA). For detailed information, please refer to Appendix A.

2. DETAILS OF THE AUDITOR

Table 5: Details of the auditor

Business name:	Cimarron (Pty) Ltd
Auditor name:	Esca Coetzee
Physical address:	7 Dikkop street, Eden George
Telephone:	082 875 6800
E-mail:	esca@cimarroncoaching.co.za

2.1 EXPERTISE OF THE AUDITOR

Esca Coetzee is an environmental scientist who holds a BSc degree in Biological Science, University of Johannesburg (1995), a BSc Honors degree in Chemistry, University of Johannesburg (1996) and a BSc Honors degree in Water Utilisation, University of Pretoria (2000). She gained broad multi-disciplinary experience from over 20 years in the petrochemical industry, 19 years as a Senior Environmental Scientist. She has experience in conducting Environmental Impact Assessments (EIA's), Environmental & Social Impact Assessments (ESIA's) and Environmental Audits and holds comprehensive knowledge of environmental legislation and the application thereof in construction projects and operational environments. She is trained on the ISO14001:2015 environmental management system and completed the Lead Auditor Environmental Management Systems, based on ISO19011 and ISO17021, training at DQS in February 2019. A detailed CV can be provided on request.

2.2 DECLARATION OF INDEPENDENCE

I, Esca Coetzee. ID 7408170022089 representative for Cimarron (Pty) Ltd declares that

- I act as an independent environmental auditor.
- I will perform the environmental audit in an objective manner and that there are no circumstances that may compromise my objectivity in performing this work.

- I realize that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 24F of the NEMA; and
- Neither Cimarron (Pty) Ltd nor I have or will have any vested interest in the undertaking of the activity other than remuneration for work.
- I have expertise in conducting environmental audits and knowledge of the environmental acts, regulations and guidelines related to audited operations.
- I will comply with all the relevant applicable legislation
- I have no, and will not engage in, conflicting interests in the audit process

3. SCOPE, PURPOSE AND OBJECTIVE OF THE AUDIT

The scope of the audit is to assess the compliance of the Pinnacle Point Residential Golf Resort Development approved EA and EMPR including associated appendices and management plans.

The purpose of the environmental audit is to assess the level of compliance with the conditions of the EA, reference number 16/3/1/5/D6/28/0011/13, and the EMPR for the Pinnacle Point Residential Golf Resort Development, Mosselbay. The DWA General Authorisation conditions were also audited and documented.

The audit objective aims to evaluate the effectiveness of the EMPR identify any new impacts and risks resulting from the activity, identify shortcomings in the EMPR, and recommend any necessary changes to the avoidance, management, and mitigation measures provided in the EMPR.

The environmental audit report will be compiled in accordance with Regulation 34 and Appendix 7 of the National Environmental Management Act, Act 107 of 1998 (NEMA) Environmental Impact Assessment(EIA) regulations of 2014. Whilst consideration was given to the relevant environmental legislation, a full comprehensive legal compliance audit is beyond the scope of this audit.

4. AUDIT METHODOLOGY

4.1 PROCEDURE FOR THE AUDIT

The audit methodology includes initial documentation review, checklist preparation, a site visit on 21 October 2025, evaluation of compliance with EA and EMPR requirements, and provision of recommendations for improvement based on findings and observations. The assessment is based on visual inspection and documentation review. Various documentation and records were required during the audit to confirm compliance with the requirements, where possible, documentation and records were made available for review during the site visit.

4.2 EVALUATION CRITERIA USED DURING THE AUDIT

The evaluation criteria for compliance scoring are based on a pre-determined scoring system where each condition of the EA and EMPR is weighted equally. The audit scoring criteria consist of fully compliant (score of 4), partially compliant (score of 2), non-compliant (score of 0), not applicable (N/A) and scored elsewhere (SE) to prevent duplication of scoring.

Table 6: Evaluation criteria

Fully Compliant (FC)	Indicating that the condition was fully complied with and is given a compliance score of 4.
Partially Compliant (PC)	Indicating that the condition has not been fully complied with and requires additional measures to achieve full compliance. Partial compliances are given a compliance score of 2.
Non-Compliant (NC)	Indicating that the condition has not been complied with and is given a compliance score of 0.
Not Applicable (N/A)	Indicating that the condition is not currently applicable and deducted from the total conditions evaluated and therefore not included in the calculation of the compliance score.
Scored Elsewhere (SE)	Indicating that the condition is repeated in another section of the checklist, and will be scored in that section and deducted from the total conditions evaluated, to prevent duplication.

4.3 CONSULTATION PROCESS UNDERTAKEN

The audit found proof in the form of interviews and observations with key personnel to conclude that PPHOA aim to achieve full compliance with the requirements as set out in the EA and EMPR for the operation of the Pinnacle Point Beach and Golf Resort. Project representatives that were interviewed and assisted with the audit were:

- General Manager - Carl van der Linde (interviewed & assisted with documentation)
- Environmental Manager - Juditte van Dyk (interviewed & assisted with documentation)
- Golf Course Superintendent – Konrad Suhr (interviewed & assisted with documentation)
- Archaeological Specialist - Dr Peter Nilssen (assisted with documentation)
- Land Surveyor – John Bailey (interviewed & assisted with documentation)
- Mosselbay Municipality Townplanning – Mr Jaco Roux (confirmed zoning via email)
- Mosselbay Municipality WaterTreatment – Mr Reggie Visagie (contacted via phone call)

5. RESULTS OF THE AUDIT

The results include a summary of compliance with the requirements of the EA and EMPR, the results of the compliance evaluation, summary of findings as well as a discussion on the continued adequacy of the EMPR within sections 5.1, 5.2, 5.3 and 5.4 respectively. The findings for the DWA General Authorisation were documented separately.

5.1 COMPLIANCE SUMMARY

A total of 39 conditions (commitments) were identified in the EA that were evaluated. Of the applicable conditions a total of 35 commitments were noted to be fully compliant, 1 partially complaint and 0 were non-compliant. A total of 159 commitments were identified in the EMPR that were evaluated. Nine (9) of these conditions were considered not applicable forty three (43) scored elsewhere. A total of eighty one (81) commitments were noted to be fully compliant, twenty three (23) partially complaint and three (3) were non-compliant. Two (2) of the 11 DWA General Authorisation, conditions were found to be in partial compliance, while the remaining 9 were assessed as compliant.

A summary of the number of conditions of the EA and EMPR rated as fully compliant, partially compliant and non-compliant are presented in figure 7 and figure 8 respectively.

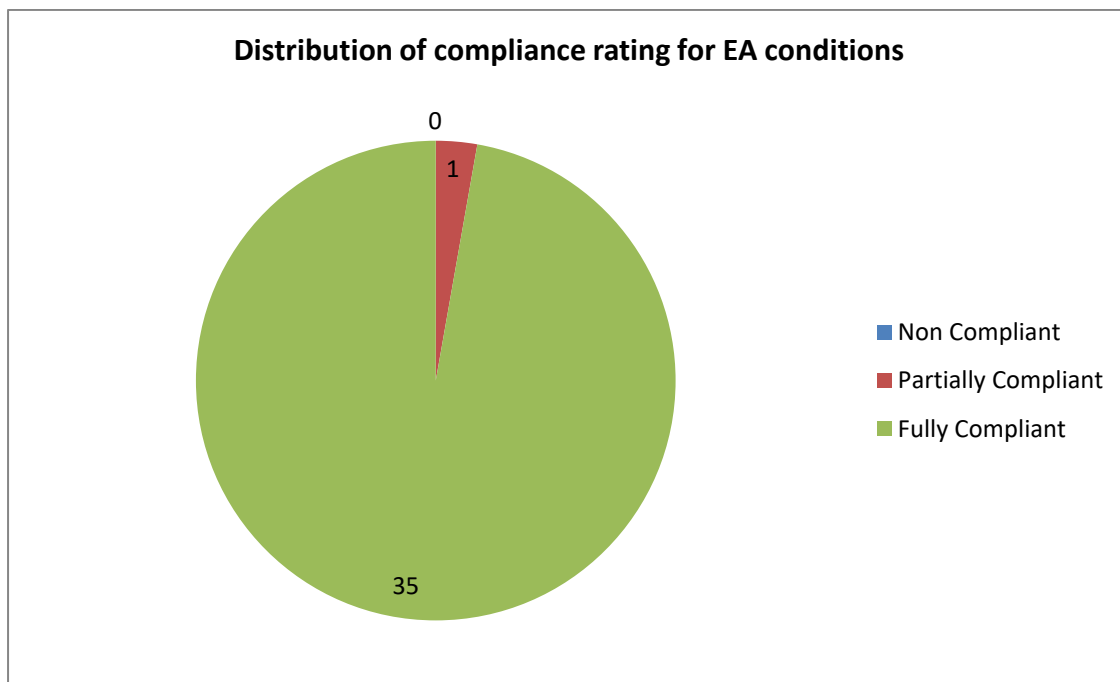


Figure 7: Distribution of compliance ratings for EA conditions

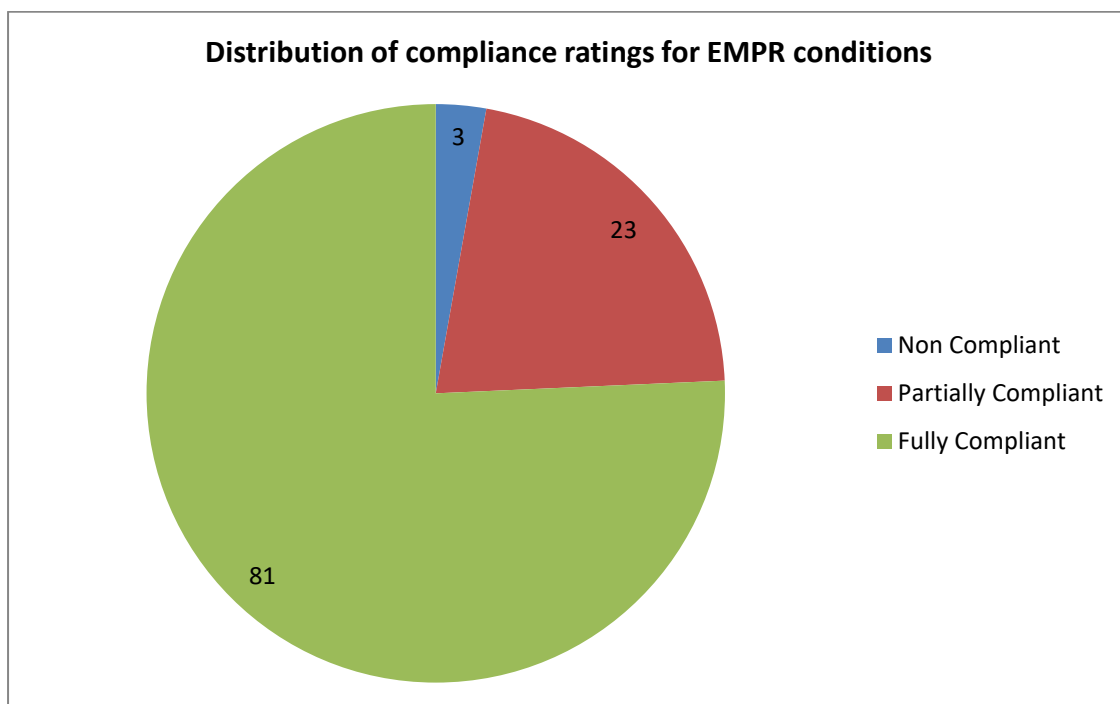


Figure 8: Distribution of compliance ratings for EMPR conditions

5.2 COMPLIANCE EVALUATION

The compliance evaluation of the EA and EMPR are provided in table 7 and table 8. (*Previous audit findings have been integrated into the checklists below and are indicated in italics for clarity and traceability.*) The conditions were rated according to the compliance evaluation criteria described in section 4.2. The findings for the DWA General Authorisation were documented in table 9.

Table 7: Compliance evaluation of the EA conditions

Nr	Condition	Score	Verification
	Record of Decision 29/10/2003 Ref EG12/2/1/1-74-Erf 2001&Erf 3438 Pinnacle Point Golf Estate (3865B) Section G: Conditions of authorisation		
1	1. The activity, including site preparation, may not commence before the statutory thirty (30) day appeal period expires.	4	This condition is applicable to the EIA & Construction phase of the development which has been completed. Compliance is assumed to have been evaluated by previous construction audits and will not be re-examined.
2	2. One week's notice in writing, must be given to the Directorate: Environmental Management, (hereinafter referred to as "this Directorate") before commencement of construction activities. 2.1 Such notice shall make clear reference to the site location details and reference number given above. 2.2 The said notice must also include proof of compliance with the following conditions described herein: Conditions 1,6,7,9 & 16	4	This condition is applicable to the EIA & Construction phase of the development which has been completed. Compliance is assumed to have been evaluated by previous construction audits and will not be re-examined.
3	3. One weeks' notice, in writing, must be given to the Directorate: Environmental Management, (hereinafter referred to as "this Directorate") before commencement of operation activities. 3.1 Such notice shall make clear reference to the site location details and reference number given above	4	This condition is applicable to the EIA & Construction phase of the development which has been completed. Compliant according to the June 2007 construction audit. The June 2007 Audit refers to a letter to DEA&DP on 25 August 2008 stating completion of construction.

Nr	Condition	Score	Verification																																
	3.2 The said notice must also include proof of compliance with the following conditions described herein: Conditions: 8, 12 & 15		Compliance is assumed to have been evaluated by previous construction audits and will not be re-examined.																																
4	4. An integrated waste management approach must be used that is based on waste minimisation and must incorporate reduction, recycling, re-use and disposal where appropriate. Any solid waste shall be disposed of at a landfill licensed in terms of section 20 of the Environmental Conservation Act, 1989 (Act No 73 of 1989)	4	An integrated waste management approach is followed. The detail in the table below was confirmed. <table border="1"> <thead> <tr> <th>Pinnacle Point Waste Streams</th><th>% of waste generated</th><th>Disposal</th><th>Frequency of collection</th></tr> </thead> <tbody> <tr> <td>Domestic waste (Wet waste)</td><td>70%</td><td>4x GreenJobs - Invisible Waste Bins. Disposal to PetroSA general waste landfill site (G:M:B-)</td><td>Daily</td></tr> <tr> <td>Recyclables (Office paper, plastic, packaging, glass etc)</td><td>6%</td><td>Henqua waste</td><td>2x week</td></tr> <tr> <td>Garden waste (Garden refuse) - mulching are done at Pinnacle Point</td><td>10%</td><td>Louis Fourie Class B (G:C:B-) organic waste site</td><td>Daily from estate Every Friday</td></tr> <tr> <td>Golf course waste (grass clippings, pruning)</td><td>10%</td><td>Louis Fourie Class B (G:C:B-) organic waste site</td><td>Daily in estate Every Friday</td></tr> <tr> <td>Construction waste - for maintenance work. Each contractor is responsible for the construction waste</td><td>3%</td><td>Groot Brak solid waste facility</td><td>1x skip removed 2x month</td></tr> <tr> <td>Hazardous waste (Used oils, lubricants, petrol, diesel, paint, maintenance products, herbicides, pesticides, batteries, solvents)</td><td>1%</td><td>Oiltech</td><td>When required</td></tr> <tr> <td>Fluorescent bulbs</td><td><1%</td><td>Municipality</td><td>When required</td></tr> </tbody> </table> Refer to Table 8_PPHOA Audit checklist EMPR section 5.13 Waste management conditions.	Pinnacle Point Waste Streams	% of waste generated	Disposal	Frequency of collection	Domestic waste (Wet waste)	70%	4x GreenJobs - Invisible Waste Bins. Disposal to PetroSA general waste landfill site (G:M:B-)	Daily	Recyclables (Office paper, plastic, packaging, glass etc)	6%	Henqua waste	2x week	Garden waste (Garden refuse) - mulching are done at Pinnacle Point	10%	Louis Fourie Class B (G:C:B-) organic waste site	Daily from estate Every Friday	Golf course waste (grass clippings, pruning)	10%	Louis Fourie Class B (G:C:B-) organic waste site	Daily in estate Every Friday	Construction waste - for maintenance work. Each contractor is responsible for the construction waste	3%	Groot Brak solid waste facility	1x skip removed 2x month	Hazardous waste (Used oils, lubricants, petrol, diesel, paint, maintenance products, herbicides, pesticides, batteries, solvents)	1%	Oiltech	When required	Fluorescent bulbs	<1%	Municipality	When required
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5	5. The mitigation/rehabilitation measures and recommendations as detailed in the Environmental Impact Report dated July 2003 compiled by Mr. CM Gaigher of CODEV must be adopted and implemented. EMP Operational phase should include: 1. Open Space management guidelines including trail maintenance (management of red data species is not addressed). 2. Education interpretation centre 3. Groundwater: a. Installation of sub-surface drains in high risk areas, draining	4	1. Open space & trail maintenance Trail are cut open monthly by environmental department and walkways and steps fixed when required by maintenance dept. Trail markers are painted on rocks along the trail. Trail markers are checked every 6 months by environmental department. 2. Currently no specific education interpretation centre. Internal skills training are conducted at Pinnacle Point and Archaeological education forms part of the Archaeological tours that are conducted by Point of Origin. Point of Human Origins: Archaeological Tours, South Africa 3. Stormwater drainage system implemented which																																

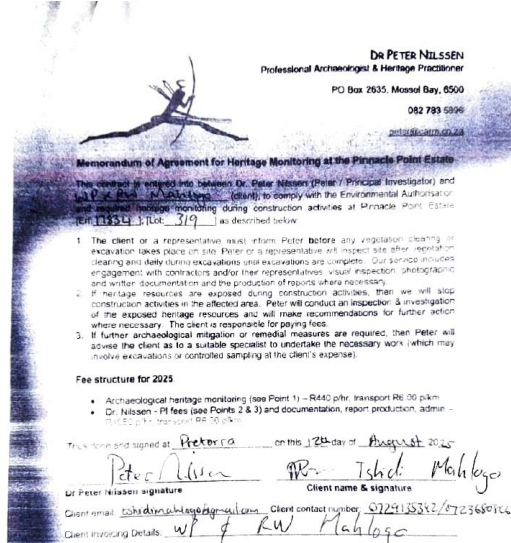
Nr	Condition	Score	Verification
	into strategically sited detention ponds/wetlands b. Use of TMG aquifer to dilute effluent if feasible. 4. Services: a. Stormwater: Construct detention dams; direct excess stormwater to natural water courses 5. Socio-Economic: a. Affirmative Procurement Policy negotiated agreed and signed with Municipality. Audit clause to ensure compliance Monitored by Municipality b. Secure year round domestic service contracts; skills development with operation of Hotel		may constitute as surface drainage system however no subsoil drainage system has been installed during the construction phase. No use of TMG aquifer. No wetlands on site. 4. Services a. Stormwater management are guided by the Stormwater guidelines 10/2009. Section 8.4. No storm water, wash water, or waste water may be directed towards any permanent water body. All Stormwater goes into existing stormwater channels. 5. Socio-Economic a. No affirmative procurement policy negotiated with the municipality however PPHOA has to comply with their employment equity (EE) plan. EE plan duration is applicable from Oct '22 – Sept '27. Status report compiled by Karl Bester from Trans4M indicates PPHOA compliance to this is still in progress for this reporting period. The Hotel is not part of this development. Previous Audit (2015) Finding: Conditions of the Record of Decision (now Environmental Authorisation under the National Environmental Management Act, Act No 107 of 1998.) The following conditions were not complied with, as the required mitigation measures were unknown. Many of them were applicable to EMPR Section 2.1 Impacts associated with the development has been complied with the construction phase of the project, but some are still applicable. These mitigation measures need to be implemented as a legal requirement for the Estate: Condition 5. The mitigation/rehabilitation measures and recommendations as detailed in the Environmental Impact Report dated July 2003 compiled by Mr. CM Gaigher of CODEV must be adopted and implemented.- Compliant

Nr	Condition	Score	Verification
			Previous Audit (2018) Finding: St Blaize trail markers <i>Comments were received from the public that some areas are not well marked, leading to people taking wrong routes. This has not been audited as non-compliance, but it does need attention, as some incidents were experienced recently along the trail. It is being addressed by additional markers and closing of misleading trails. Hole 13 still needs more markers.-</i> Compliant
6	6. The applicant must appoint a suitably experienced and qualified Environmental Control Officer (ECO) before commencement of any land clearing or construction activities to ensure that the mitigation/rehabilitation measures and recommendations referred to in this Record of Decision are implemented and to ensure compliance with the provisions of the construction phase EMP. The ECO must report to the Environmental Liaison Committee (ELC), and where appropriate to this Directorate, on a regular basis.	4	Mr M Steenkamp was appointed as ECO during the main construction phase.
7	7. The applicant must compile and submit an acceptable construction phase Environmental Management Plan ("CEMP"), for the installation of the services, roads, residential units and the golf course to this Directorate. The CEMP must: 7.1 Be submitted to this Directorate and Heritage Western Cape at least three weeks prior to construction activities commencing. This must be approved by this Directorate and Heritage Western Cape prior to any land clearing and construction commencing. 7.2 Be supported and recommended for approval by the ELC. 7.3 Describe the level and type of competency required of the Environmental Control Officer (ECO). 7.4 Define and allocate the roles and responsibilities of the ECO referred to above 7.5 Determine the frequency of site visits 7.6 Be included in all contract documentation for the construction phase of the development and integrated into another appropriate mechanism	4	A CEMP was compiled by Planning Partners Cape Town and approved by DEA&DP on 22 December 2003. This is available at the PPHOA offices. No construction was occurring during the audit. Compliance assumed

Nr	Condition	Score	Verification
	used to ensure that contractors are legally bound to comply with its requirements. 7.7 Provide guidance on the treatment of any archaeological or other heritage resources uncovered during construction. 7.8 Address the complete removal and eradication of all alien/invasive vegetation before any of the units may be occupied.		
8	8. The applicant must compile and submit an acceptable operational phase Environmental Management Plan ("EMPR") for the entire property. This must be approved by this Directorate before any of the units may be occupied. The EMPR must: 1. As a minimum address the following: a. Burning of fynbos b. The complete removal and eradication of all alien/invasive vegetation and management of greens to prevent the spread of kikuyu grass c. Management of conservation areas d. Storm water management e. Fauna management (as appropriate) f. Water conservation and demand management g. Waste minimizations h. Energy efficiency and i. Any other aspects identified by the specialists and ELC i. The acquisition of additional land for conservation purposes, as outlined in the specialist botanical review, must be pursued in consultation with the local authority ii. The various recommendations in the specialist botanical and other studies must be implemented. 2. Incorporate the conditions of authorisation given in this Record of Decision, as appropriate to the operational phase of the project. The Home Owners Association and/or operator of the facility must implement and ensure compliance with this EMPR.	4	1. An operational environmental management plan (EMPR) was compiled by Cape Environmental Assessment Practitioners in 2014 and approved by DEA&DP. Proof of EMPR approval by DEA&DP Ref EG12/2/1/74/3865(B) received on 27/08/2014 a. Burning of fynbos - EMPR section 5.7 b. PPHOA is removing aliens on a daily basis. Below is the alien removal programme for 2025. Alien removal is done in house with dedicated trained staff. The company Natural Environmental Rehabilitation are appointed to assist with the clearing of alien vegetation in the leased areas. Invoices available. Department of Forestry, Fisheries and the Environment (DFFE) conducted an Alien and Invasive Species compliance audit on 28 January 2025. The outcome of the site visit was positive. Formal feedback from the department is still pending. Also refer to removal of alien/invasive vegetation – EMPR section 5.6

Nr	Condition	Score	Verification
			 c. Conservation areas – EMPR section 2.5 d. Stormwater management – EMPR section 4.2 e. Wildlife management – EMPR section 5.12 f. Water conservation – EMPR section 5.10 g. Waste management – EMPR section 5.13 h. Energy conservation – EMPR section 5.11 i. Additional land for conservation – EMPR section 2.5 i. Additional land for conservation – EMPR section 2.5 ii. Specialist study requirements incorporated into the operational EMPR 2. All the conditions of the ROD, applicable to operational phase, were incorporated into the EMPR. The EMPR is being implemented and is included in the scope of this audit
9	9. An Environmental Liaison Committee (“ELC”) must be established at the cost of the Applicant, at least three weeks prior to any land clearing or	4	The ELC was established in 2004. The 2007

Nr	Condition	Score	Verification
	construction commencing. 9.1 The applicant must draw up the ELC's draft terms of reference ("TOR") and submit it to this Directorate. This must be approved by this Directorate prior to any land clearing or construction commencing. Clear guidance must be provided regarding the composition and roles/responsibilities of the ELC. 9.2 The TOR must include but is not limited to the following: 9.2.1 the frequency of meetings and reports 9.2.2 chairmanship/membership 9.2.3 auditing requirements 9.2.4 duties and responsibilities during the construction phase 9.2.5 the termination of such ELC 9.2.6 the frequency of providing feedback to the local community 9.2.7 oversee all of the development activities associated with the three applications at Pinnacle Point		Environmental audit listed monthly ELC minutes of meetings since 2004 as part of their documents reviewed during the audit. However due to Pinnacle Point Resort (Pty) Ltd, liquidation in November 2011, the Pinnacle Point Home Owners Association (PPHOA) has taken over these responsibilities. The ELC has subsequently been disbanded.
10	10. The applicant must submit an Environmental Audit Report ("audit report") to this Directorate six months after construction of the golf course and infrastructure have been completed. 10.1 The audit report must indicate the date on which the construction was complete, and detail compliance with the conditions of this authorisation and the status of the rehabilitation programme. 10.2 This Directorate may require remedial action should the audit report reflect that rehabilitation is inadequate. 10.3 If the audit report is not submitted, this Directorate may give 30days written notice and may have such an audit undertaken at the expense of the applicant and may authorise any person to take such measures necessary for this purpose	4	It seems from previous audits that construction ended between August 2006 and October 2006. Two construction audit reports are available at the PPHOA office. • Construction audit report (July 2005) by Nelson Mandela University & • Post construction audit report (June 2007) by Errol Cerff Environmental Management consulting. Compliance of submission to DEA&DP is assumed.
11	11. The applicant must appoint a specialist archaeologist to oversee all excavation and earthmoving activities. The specialist archaeologist must report to the ELC and where appropriate to Heritage Western Cape on a regular basis.	4	Construction of new dwellings during the operation phase has to comply with the following guideline documents Architectural guidelines (2021), Landscape guideline (2009), Stormwater guideline (2003), HOA

Nr	Condition	Score	Verification
			House rules (2024) and Building rules. The landscape guideline document (2009) stipulates in section 4.10.3 “An archaeological monitor should be consulted before any excavations take place”. An archaeological monitoring form has to be submitted to PPHOA as part of the handover checklist for sites. Proof of handover sign off is filed as part of each property file. MAPCRM and Dr Nilssen are appointed to conduct archaeological monitoring of vegetation clearing and earthworks on the Pinnacle Point Estate. No significant heritage resources were identified during the past year and hence there was no requirement for reporting to the ELC or HWC. Email from Dr Nilssen 17/10/2025. Proof of involvement on Lot 319 below 

Nr	Condition	Score	Verification
12	12. The applicant must develop and implement an Archaeological Conservation Management Plan (ACMP) for the entire development area. This must be approved by Heritage Western Cape or the South African Heritage Resources Agency (SAHRA) before any of the units may be occupied.	4	Archaeological Conservation Management Plan 2/2014 was developed. This plan was endorsed by the HWC on 9/05/2014. Endorsement letter available. An integrated conservation management plan was developed for the Pinnacle Point Site Complex (PPSC) UNESCO WHS over the past few years (Nilssen attempting to obtain this from heritage authorities), but still requires UNESCO review and approval. Email from Dr Nilssen 17/10/2025
13	13. The recommendations made by SAHRA in their review comment dated 14 June 2002 on the Archaeological Impact Assessment (Phase 1: Archaeological Study: Proposed Pinnacle Point Development A), must be implemented. The following (italicized) is from a letter (dated 14 June 2002) written by Mrs. Mary Leslie (archaeologist of SAHRA) that contains the conditions pertaining to the conservation and management of archaeological and heritage resources at Pinnacle Point. Mrs Leslie concluded that SAHRA would not object to the development provided that: 1. An archaeological conservation management plan is developed for the entire property within the next six months (including those areas which are not presently being developed) that will provide adequate measures for the conservation and management of the significant archaeological sites in the area, and that when approved by SAHRA (now HWC) the ... (developers) ... undertake to ensure that arrangements are made for the funding and implementation of this plan. 2. In the area above the cliffs where development is to take place: a. All earthmoving must be monitored by an archaeologist. b. It must be established for all sites either that suitable excavation of samples for analysis of content and dating of the sites have been undertaken to mitigate against the possibility that the sites are destroyed during development or by the impact of visitors, or, in the case of more	4	1. Archaeological Conservation Management Plan 2/2014. Endorsement letter from HWC on 9/05/2014 2. Email from Dr Nilssen 17/10/2025: Compliant 3a. Refer to Table 8_PPHOA Audit checklist EMPR section 5.8 Archaeological management plan conditions for control measures. The Financial Manager has verified the Pinnacle Point Home Owners Association's FY2026 Consolidated Budget in collaboration with the Auditor. PPHOA is confident that the funds allocated for environmental management in previous financial years, as well as those earmarked for upcoming years, are sufficient to ensure continued implementation and compliance with the Environmental Authorisation (EA) and Environmental Management Programme (EMP) requirements. Proof of Email 6/10/2025. Feedback from Dr Nillsen on 17/10/2025 indicates that the primary heritage sites of the Pinnacle Point Site Complex (PPSC) Provincial Heritage Site (PHS) and UNESCO World Heritage Site (WHS) are caves 13B and 5-6N&S. 13B is under ongoing monitoring, conservation

Nr	Condition	Score	Verification
	<i>significant sites, that suitable conservation measures, perhaps interpretive boards and boardwalks are put in to ensure that they are not disturbed by the action of the increased numbers of people on the property.</i> 3. In the area of the cliffs: <i>a. Control measures must be put in place to ensure the protection of the very important archaeological cave deposits in perpetuity. These deposits require stabilisation and protection against increased traffic. The best way to achieve this must be addressed in the conservation management plan and funding must be made available for this. This will need to be undertaken in tandem with a program of interpretation of the sites to ensure that visitors understand their significance.</i> <i>b. All access to the areas below the existent hiking trail should be delineated and controlled. This must be done in conjunction with the archaeologists of the Mossel Bay Archaeological Project who have been studying these deposits.</i> <i>c. Assurance needs to be given that continued support and reasonable ease of access will be given to the scientists who are and will be wishing to study these sites.</i>		and protection through measures implemented and funded by the Point of Human Origins (PoHO) tourism initiative, which is directed by Dr Nilssen. Plans for the stabilization and protection of 5-6N&S are being developed by Prof Marean, Dr Nilssen and Prof Marean has secured funding for the implementation of the stabilisation and conservation measures. Site 5-6N&S is monitored by Prof Marean's team during water monitoring. 3b. Email from Dr Nilssen 17/10/2025: The only public access to the sensitive archaeological areas below the cliffs is to cave 13B as permitted by the PPHOA, endorsed by HWC and Prof Marean, and managed by PoHO under the direction of Dr Nilssen. 3c. Email from Dr Nilssen 17/10/2025: Scientists, under the leadership of Prof Marean, are given continued support and reasonable ease of access to conduct research at the heritage sites of the PPSC PHS & WHS. Previous Audit (2015) Finding: Condition 13. <i>The recommendations made by SAHRA in their review comment dated 14 June 2002 on the Archaeological Impact Assessment (Phase 1: Archaeological Study: Proposed Pinnacle Point Development A), must be implemented - Compliant</i>
14	14. The applicant must ensure that the individual property owners are legally bound to comply with the requirements of the EMPR, particularly as they relate to the management of the conservation areas, either in the deed of sale or consultation with the Homeowners Associations.	4	Obligation to comply with EMPR section 1.2 Status of EMPR " <i>It is noted that Clause 110 of the Deed of Sale (for the transfer of any property), as well as the PPHOA Memorandum of Incorporation imposes an obligation to comply with the EMPR and EA</i>"

Nr	Condition	Score	Verification
			Architectural guidelines stipulate in section 1.14 <i>"Environmental management as per the PPHOA EMP must be adhered to at all times during construction"</i> Hard and electronic copy of the approved EMPR is available at the PPHOA office. Electronic copy of the approved EMPR is available on the PPHOA website https://pinnaclepointestate.co.za/wp-content/uploads/2019/02/EMPR-Pinnacle-Point-Final2019.pdf. This shows that homeowners are informed of the EMPr and guideline documents Previous 2015 Audit finding: Section 1.2 Purpose of the OEMP: <i>Copies of this OEMP must be kept on site and all home and land owners are expected to familiarise themselves with the content of this OEMP.</i> Finding: <i>Only two hard copies of the OEMP are available at the offices of the PPHOA, of which one is the working document of the ECO. No proof could be found that homeowners are informed of the existence or the content of the document - Compliant</i> Previous Audit (2018) finding: <i>OEMP wording related Non-compliance issues.</i> <i>"The OEMP must be included as part of any tender documents/agreements as well as contractual documents between the Proponent or individual land owners and any contractors"</i> <i>This specification led to a non-compliance finding as the OEMP (a cumbersome document) is not included in tender documents or agreements. Rather, there are issue specific documents (e.g. architectural code, stormwater master plan, builders' agreement) that are part of the OEMP and are designed for implementation of the conditions of approval and other issues. These are included in tender documents or agreements and adequately meet the purpose of implementing the OEMP.</i>

Nr	Condition	Score	Verification
			Correction action required: Review of the OEMP is required to address this issue and avoid future non-compliance findings. The clause in the deed of sales imposes this -Compliant
15	15. The applicant must establish a Trust with adequate funding from the applicants to oversee the conservation areas through the lifespan of the development. An amendment to the existing Constitution of the Pinnacle Point Casino Community Trust and commitment by the various applicants to contribute to this Trust may fulfil the requirement.	2	Pinnacle Point Beach and Golf Resort established a Conservation Trust on September 20, 2007, according to the Deed of Trust. However due to Pinnacle Point Resort (Pty) Ltd, liquidation in November 2011, the Pinnacle Point Home Owners Association (PPHOA) has taken over these responsibilities. The funding for managing the estate, including the implementation of the Operational Environmental Management Plan (EMPR) and associated appendices and management plans, is provided through levies collected from the homeowners. The Financial Manager has verified the Pinnacle Point Home Owners Association's FY2026 Consolidated Budget in collaboration with the Auditor. PPHOA is confident that the funds allocated for environmental management in previous financial years, as well as those earmarked for upcoming years, are sufficient to ensure continued implementation and compliance with the Environmental Authorisation (EA) and Environmental Management Programme (EMP) requirements. Proof of Email 6/10/2025 Recommendation: Update the EMPR to reflect this change
16	16. The applicant must, within five calendar days of the date of issue of this Record of Decision: Inform the relevant local authority as well as all interested and affected parties, (I&AP's) registered during the Scoping and Impact Assessment processes in writing of the outcome of this application and, if requested, provides copies of this Record of Decision within reasonable time before expiry of the thirty day appeal period.	4	This condition is applicable to the EIA and construction phase of the development which has been completed. Compliance is assumed to have been evaluated by previous construction audits and will not be re-examined.

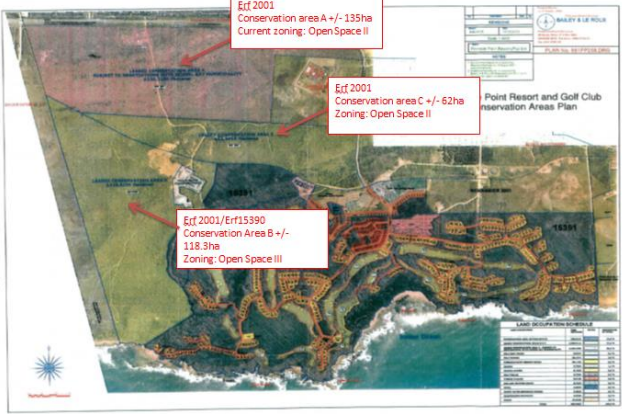
Nr	Condition	Score	Verification
	• Lodge a full suite of relevant documentation and explanatory letter outlining the contest of this documentation at the Mossel Bay Municipality and Pinnacle Point Sales Office during the appeal period to facilitate access and consideration by members of the public. I&AP's must be informed of this when they are informed of the Record of Decision. • Include in such information the provisions of Regulation 11 of Government Notice No. R1183 of 5 September 1197, as amended, which read as follows: ○ An appeal to the Minister or provincial authority under section 35(3) of the Act must be done in writing within 30days from the date on which record of decision was issued to the applicant in terms of regulations 10(1) ○ An appeal must set out all the facts as well as the grounds of appeal and must be accompanied by all relevant documents or copies of them which are certified as true by a commissioner of oaths. • Include the date on which the record of decision was issued to the applicant in terms of regulation 10(1) and the date by which appeals must reach the Minister. • Inform all I&AP's that a signed and certified Appeal Questionnaire, is obtainable from the Ministers office • If the applicant should appeal against this Record of Decision, he must inform all interested and affected persons that such an appeal is being lodged with the Minister and if requested the applicant/appellant must provide those persons with reasonable access to a full copy of the appeal within a reasonable time before expiry of the thirty day appeal period		
17	17. This Directorate must be notified within 30 days thereof, of any change of ownership and/or project developer, as well as any change of address of the owner and or project developer	4	The EA was transferred onto the PPHOA on 9/10/2013. Addendum to EA issued REF: 16/3/1/5/D6/28/0011/13

Nr	Condition	Score	Verification
18	18. All outdoor advertising associated with this activity, whether on or off the property concerned, must comply with the South African Manual for Outdoor Advertising Control.	4	According to the Environmental manager there are no advertising boards. The auditor did not notice any advertising boards during the site visit.
19	19. The applicant shall be responsible for ensuring compliance with the conditions contained in the Record of Decision by any person acting on his behalf, including but not limited to, an agent, servant employee or any person rendering a service to the applicant in respect of the activity, including but not limited to contractors and consultants.	N/A	This condition is a statement and therefore not scored. The PPHOA take note of this condition.
20	20. The owner and/or developer must notify this Directorate and any other relevant authority, in writing, within 24 hours thereof if any condition of this authorisation is not adhered to.	N/A	This condition is a statement and therefore not scored. The PPHOA take note of this condition.
21	21. Departmental officials shall be given access to the property referred to in B above for the purpose of assessing and/or monitoring compliance with the conditions contained in this Record of Decision, at all reasonable times	N/A	This condition is a statement and therefore not scored. The PPHOA will give Department Officials access to the property at all reasonable times. DFFE conducted an Alien and Invasive Species compliance audit on 28 January 2025. The outcome of the site visit was positive. Formal feedback from the department is still pending.
	Environmental Authorisation 9/10/2013 Ref nr: 16/3/1/5/D6/28/0011/13 2. All conditions in Section G and all other information contained in the Environmental Authorisation, Ref nr EG12/2/1/1-74-ERf 2001&ERf 3438 Pinnacle Point Golf Estate (3865B) remains unchanged and is still in force. Section C: Conditions		
22	1. The applicant must, in writing, within 12(twelve) calendar days from the date of the Department's decision – 1.1 Notify all registered interested and affected parties of 1.1.1 the outcome of the application 1.1.2 the reasons for the decision 1.1.3 the date of the decision and 1.1.4 the date of issue of the decision	4	An email dated 22 January 2014 between the CAPE EAPrac and DEADP confirmed that, under the previous Pinnacle Point Record of Decision (ROD) issued in terms of the Environmental Conservation Act (ECA), there was no requirement for registered Interested and Affected Parties (I&APs). Furthermore, as the Amendment Application was not advertised—given its classification

Nr	Condition	Score	Verification
	1.2 draw the attention of all registered interested and affected parties to the fact that an appeal may be lodged against the decision in terms of Chapter 7 of the Environmental 1.4 Impact Assessment Regulations, 2010 detailed in section D below; 1.3 draw the attention of all registered interested and affected parties to the manner in which they may access the decisions, and 1.4 publish a notice in the newspapers contemplated in reg 54(2)(c) and (d), and which newspaper was used for the placing of advertisements as part of the Public Participation Process, that – 1.4.1 informs all interested and affected parties of the decision 1.4.2 informs all interested and affected parties where the decision can be accessed; and 1.4.3 informs all interested and affected parties that an appeal may be lodged against the decision in terms of Chapter 7 of the Regulations		as a non-substantive amendment—no I&AP register was compiled or available. Consequently, notification of the amendment decision to ‘registered’ I&APs was not feasible. Based on this, there were no registered I&APs associated with the amendment process and this condition was not applicable
23	2. One week’s written notice must be given to the Directorate: Land Management (Region 3), before continuation of the construction activities. The said notice must also include proof of compliance with Condition 1 described in Section C of this Addendum to Environmental Authorisation.	4	This condition is applicable to the EIA & Construction phase of the development which has been completed. Compliance is assumed to have been evaluated by previous construction audits and will not be re-examined.
Extra conditions of approval			
24	1. On 29 October 2003 DEA&DP issued a Record of Decision approving the development of the Pinnacle Point Beach & Golf Club. On 28 November 2003 three appeals were submitted against the Record of Decision. The substance of these consultations has resulted in an agreement between the appellants and the Developer, in which the Developer has agreed to be contractually bound to a set of conditions that deal with the concerns articulated in their appeals. The attached “Extra Conditions” need to be treated as though they were conditions of approval in our ROD.	4	The Record of Decision (ROD) is legally binding under environmental law, and non-compliance may lead to penalties. Privately agreed conditions between the developer and appellants are contractually binding but not enforceable under environmental law unless incorporated into the ROD or Environmental Management Programme (EMPr). Once included in the EMPr, these conditions become statutory obligations under NEMA and are subject to audits and enforcement. Including such conditions in the audit is appropriate and consistent with best practice. These

Nr	Condition	Score	Verification
	The developer undertakes: - To comply with the special conditions as if they form part of the ROD; - To propose to the ELC that its mandate be broadened to monitor the enforcement of the special conditions and that the Constitution of the ELC is amended to reflect such broadened mandate; - To nominate a representative of WESSA to serve on the ELC for as long as WESSA so desires; - To ensure that the Constitution of the HOA places an obligation on the HOA, once constituted, to enforce compliance with the ROD and the special conditions; - To ensure that the conservation area is established during the construction phase; - To ensure that, the Trust referred to in paragraph 15 of the ROD is established and funded with adequate funding to oversee the conservation area through the lifespan of the development and, to that end: - To draft the Trust deed in consultation with the ELC and WESSA and obtain their approval of the said Trust deed before its registration; - To invite WESSA to be a trustee of the Trust; - Not to use the conservation area in any way incompatible with a zoning appropriate for nature conservation area or nature reserve.		conditions are part of this audit and compliance scored. - This condition is a statement and therefore not scored. The PPHOA see the extra conditions as part of the ROD requirements and therefor are included in scope of audits. - The ELC has been disbanded. The ELC mandate was not reviewed as part of the audit. - WESSA was part of the Trust. - The PPHOA included the extra conditions as part of the ROD. - The PPHOA renewed two lease agreements with the Mossel Bay Municipality for the areas (owned by the Municipality) to be managed as part of their conservation area. Refer to condition 2 below. - The Financial Manager has verified the Pinnacle Point Home Owners Association's FY2026 Consolidated Budget in collaboration with the Auditor. PPHOA is confident that the funds allocated for environmental management in previous financial years, as well as those earmarked for upcoming years, are sufficient to ensure continued implementation and compliance with the Environmental Authorisation (EA) and Environmental Management Programme (EMP) requirements. Proof of Email 6/10/2025. - Trust deed available - WESSA was part of the Trust. - WESSA trustee that was part of the Trust: Michael Thomas David Savage ID 4011045073080 - Refer to condition 2 below
25	2. It is recorded that in respect of the proposed lease to be concluded	4	Two of the three lease agreements with the Mosselbay

Nr	Condition	Score	Verification
	between the developer and the municipality for the lease of the 121 hectare area, the municipality has agreed to include the following provisions in the written agreement of lease: - - The leased area shall, for the duration of the lease, be used exclusively for nature conservation purposes and no development shall take place in this conservation area; - The leased area shall be rehabilitated and managed by the lessee in accordance with a scientifically developed nature conservation management plan; - The lessee shall, on behalf of the land owner (the Municipality) lodge an application for rezoning of the leased area from undetermined zoning (in terms of which no land use is permitted) to zoning appropriate for a nature conservation area or nature reserve and the land owner shall not object to such rezoning. <i>Portion of Erf 2001 of approximately 60ha for a period of 9 years and 11 months ceded to the PPHOA on 27 July 2012</i> <i>Portion of Erf 2001 of approximately 118.3ha for a period of 9 years and 11 months ceded to the PPHA on 27 July 2012; and</i> <i>Portion of Erf 2001 of approximately 111ha for a period of 99 years ceded to the PPHA on 20 November 2012. This portion is excluded from the area deemed to be the "conservation area" in as far as this EMPR refers.</i>		Municipality were renewed on 9 November 2023. These areas are partially under ownership of the Pinnacle Point Homeowners' Association and partially under Municipal ownership and managed as part of their conservation area. These areas include: Internal conservation areas with linking corridor function; - Portion of Erf 2001 of approximately 60ha: Lease renewed - Portion of Erf 15390 (previously a portion of Erf 2001) of approximately 118.3ha: Lease renewed - Portion of Erf 2001 of approximately 111ha for a period of 90 years (changed to 50 years) ceded to the PPHA on 20 November 2012. <u>This portion is excluded from the area deemed to be the "conservation area" in as far as this EMPR refers.</u> All three leased areas 1, 2, and 3 have been rezoned, although the exact dates of rezoning remain unclear. Portions of Erf 2001, measuring approximately 60 hectares, have been rezoned as Open Space II (Primary use Private Open Space). Erf 153920, previously a portion of Erf 2001, covering approximately 118.3 hectares, has been rezoned as Open Space III (Primary use Nature Conservation Area. Portion of Erf 2001, measuring 111ha has been rezoned as Open Space II (Primary use Private Open Space). This section, comprising municipal land adjacent to Louis Fourie Road, is no longer under the management of Pinnacle Point, as part of the land has been approved for cemetery use and new road infrastructure.

Nr	Condition	Score	Verification
			 Previous audit (2015) finding: Section 2.5 Conservation Areas: The rezoning of the leased areas from Undetermined to Open Space or an equivalent Conservation zoning must be enforced within 12 months from the date of approval of the OEMP. Finding: No areas have been rezoned yet.- Compliant Previous audit (2015) finding: The termination of the Conservation Trust to oversee conservation management of the Estate. The Trust was found to add additional cost without adding value. Several clauses in the OEMP refer to the Conservation Trust. It is also a condition in the ROD. Either the Conservation Trust must be re-instated or another alternative, acceptable to the Department of Environmental Affairs and Development Planning need to be sought before the next audit. This Trust is meant to address the conservation of the leased land, including the issue of rezoning of the land. “The rezoning of the leased areas from Undetermined to Open Space or an equivalent Conservation zoning must be enforced within 12 months from the date of approval of the OEMP”.

Nr	Condition	Score	Verification
			<i>The condition of approval that this relates to is condition 8.1: Any other aspects identified by the specialists and ELC: The acquisition of additional land for conservation purposes, as outlined in the specialist botanical review, must be pursued in consultation with the local authority. The areas leased from the Municipality shows compliance with this condition. However, it was taken further in the OEMP, stating that the leased land should be rezoned. This is problematic, as the leased land does not belong to the PPHOA and the PPHOA has no jurisdiction to enforce this rezoning. Solutions to this condition of approval need to be sought before the next audit.</i> Correction action required: Review of the OEMP is required to address this issue.- Compliant Previous audit (2015) finding: Section 2.5 Conservation Areas: The existing Conservation Areas Plan should be used as the basis for development of the Conservation Management Plan for applicable areas of the resort within 12 months from the date when the OEMP is approved by the Department. Finding: No conservation Areas management plan exists – Conservation management Plan 2018 - Compliant Previous audit (2024) recommendation: Revisit this condition to determine the proposed way forward to formalise the zoning. Update the EMPR with this proposal. – Areas zoned - Compliant
26	3. The developer undertakes to furnish WESSA with a copy of the signed agreement of lease and the application for rezoning within 90 (ninety) days of the signature date.	4	Areas have been rezoned. Refer to previous condition.
27	4. The developer undertakes to use its best endeavours to ensure that the conservation area will be retained for nature conservation purposes in perpetuity (including the 170 ha portion of land for which the developer has tendered).	4	Areas have been rezoned. Refer to previous condition
28	5. An alien invasive plant eradication and management plan for the estate and the conservation area shall be completed, with appropriate peer review and approval of the ELC, and implemented during the construction	4	PPHOA is removing aliens on a daily basis. Below is the alien removal programme for 2025. Alien removal is done in house with dedicated trained staff. The

Nr	Condition	Score	Verification
	result in: a. amendments to the current proposed layout for the residential erven, save in respect of phases B1 and A1, which have already been finalised, and only to the extent that such amendments do not result in any revised town planning and/or environmental applications being required and/or any reduction in the total number of residential erven in the development; and/or b. site specific development restrictions being placed on certain residential erven.		
30	7. An adequate number of appropriately qualified nature conservation staff, as determined by the ELC from time to time, is to be employed to manage the conservation area.	4	The ELC was established in 2004. However due to Pinnacle Point Resort (Pty) Ltd, liquidation in November 2011, the Pinnacle Point Home Owners Association (PPHOA) has taken over these responsibilities. The ELC has subsequently been disbanded. The current environmental manager appointed to manage the conservation areas are Juditte van Dyk. On the organogram it shows the environmental manager is supported by 22 employees.
31	8. Kikuyu grass (<i>Pennisetum clandestinum</i>) shall not be allowed anywhere in the development. An environmentally friendly and non-invasive species shall be used as substitute.	4	A Landscaping guideline was compiled in 09/2009. Section 3.3.3 of this guideline stipulates that No Kikuyu grass (<i>Penneseum clandestinium</i>) or exotic grasses may be cultivated on an erf. Kikuyu was not visible on the areas visited during the audit. However it is understood that this is a daily ongoing process. Refer to Table 8_PPHOA Audit checklist EMPR section 5.6 Removal of alien/invasive vegetation
32	9. Treated sewerage effluent will be used for irrigation of the golf course only, and shall not be allowed in any way into the conservation area. A surface and subsoil drainage system will be installed to feed all surplus irrigation water into a subsurface system, which will lead such surplus back to the new wastewater treatment works. The drainage system to be used	4	Irrigation water is only used on the golf course. Drain points on golf course drain into stormwater system. Previous Audit (2024) Recommendation: Revisit this condition to ensure full compliance. Update the EMPR to reflect the approach to addressing this condition. -Compliant

Nr	Condition	Score	Verification
	shall be one, which has to date shown a high level of success. The ELC shall be involved in all discussions, technical data presentations and the final design, control and monitoring of the selection of the system, including the eventual decision on the system. All concerns raised by the ELC must be addressed to its satisfaction.		
33	10. The building of a storage dam should be explored, so as to ensure further “polishing” of the water from the wastewater treatment works prior to its use on the golf course. The dam shall not be constructed in the conservation area and shall be developed so as to replicate a natural wetland system in as many aspects as possible.	4	DWA authorised the disposal of water containing waste at a Pinnacle Point Golf estate irrigation dam of 24830m³ Ref: 16/2/7/k101/B19. Lined Irrigation dam was constructed below the municipal waste water treatment plan. An aerator has been installed on the dam. Refer to Table 9: Compliance evaluation of the DWA General Authorisation section 9K  Aerator installed in irrigation dam
34	11. No abstraction of ground water will be allowed in the development.	4	There are no boreholes on the Estate
35	12. The ELC shall appoint the Environmental Control Officer (ECO). The ECO will be on site full-time during the construction phase of the development.	4	ECO was appointed for the construction phase. Proof of environmental audits conducted at the PPHOA office.
36	13. The specifications for the use and application of poisons, pesticides,	4	Specifications for the use and application of poisons,

Nr	Condition	Score	Verification
	herbicides and fertilisers must form part of the operational phase environmental management plan (EMPR).		pesticides, herbicides and fertilisers are stipulated in the EMPR. Refer to Table 8_PPHOA Audit checklist EMPR section 5.6 Alien Vegetation Management plan conditions
37	14. The final alignment (i.e. positioning) of the St Blaize Hiking Trail must be approved by the ELC prior to its upgrading and the registration of the public access servitude.	4	The St Blaise trail is well known and is used by the public. The trail is maintained by the PPHOA. Final approval by the ELC is assumed.
38	15. The ELC must approve, prior to their implementation, the Constitution of the HOA and the HOA's House Rules, Architectural and Landscaping Guidelines, which shall include a list of allowable flora and fauna species (domestic animals).	4	Approved documents: App D HOA Articles 10/12/2004 App E HOA house rules 19/03/2024, Section 3 specifies requirements applicable to domestic animals App G Architectural code 07/2018 App I Landscaping guidelines 09/2009 include estate plant list. The following documents are in the process of being updated Archaeological Conservation Management Plan, HOA House rules, Architectural Code and ARC Stormwater management guidelines.
39	16. In the event of any "Red Data" specimens or populations being found, the appropriate action referred to in the construction phase environmental management plan shall be taken	4	During operation, for construction of new dwellings: Sites are fenced off before clearing and search and rescue is carried out before site clearance. Landscaping guideline 09/09 section 4.9.2 In order to prevent the search & rescue (especially Red data species) plants being taken off site, HOA's permission needs to be given.

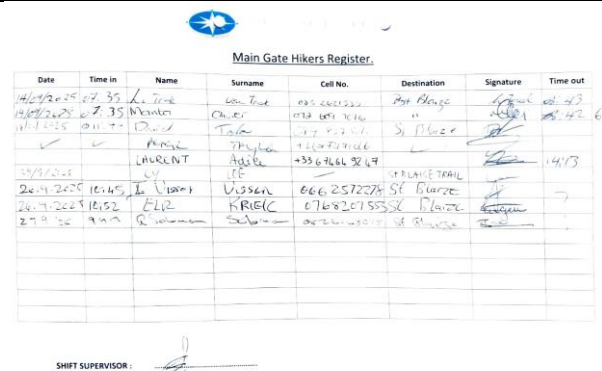
Table 8: Compliance evaluation of the EMPR conditions, incl. appendices and management plans

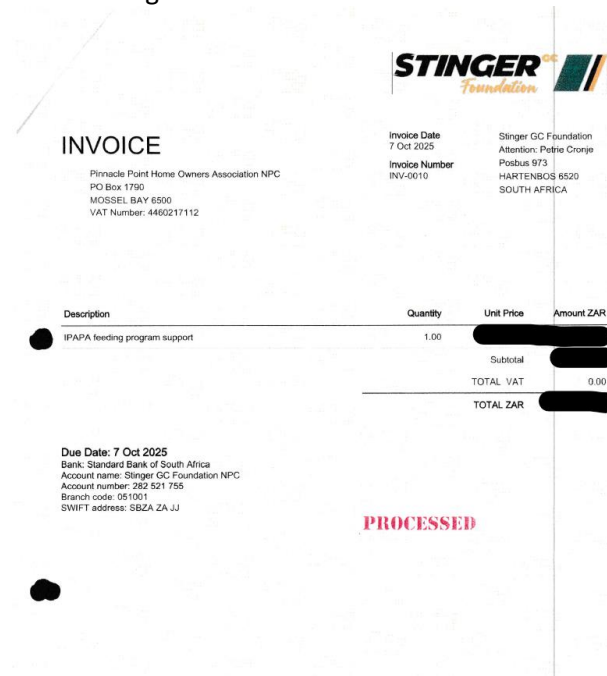
Nr	CONDITION	SCORE	VERIFICATION
	Operational Environmental Management Plan (22 Aug 2014) MOS252/02		
1	The Draft EMPR was submitted to DEA&DP by the PPHOA in 2013. DEA&DPs review comments on the draft requested that the following be addressed in an updated version of the report: 1. Clarification on the Roles & Responsibilities of parties involved with the management of the Resort; 2. Additional detail on monitoring requirements and performance indicators of management actions; 3. Include an Implementation Schedule for ongoing actions; 4. Integrate the Archaeological Conservation Management Plan (ACMP) and Fire Management Plan with the EMPR; 5. Ensure that sufficient funding are allowed for in the annual budget to achieve conservation and management targets; 6. Detail the initiatives undertaken, or to be undertaken for creating environmental awareness; 7. Reintroduce the ELC in an overseeing role to assist with EMPR compliance at annual meetings. Alternatively introduce independent annual Audits to report any non- compliance that could not be rectified; 8. Specific shortcomings identified by the Department must be addressed; and 9. Allowance to be made for vehicular access to erven previously only accessible via golf carts.	4	As stated in the approved EMPR pg 3 “This EMPR contains these management requirements and recommendations” Updated and approved final EMPR 22 Aug 2014 Ref MOS252/02. Proof of EMPR approval by DEA&DP Ref EG12/2/1/74/3865(B) received on 27/08/2014.
	1. Introduction		
	1.1 Revisions of the EMPR		
2	This EMPR reports on a number of existing initiatives and requirements that has been in existence since before finalisation of this EMPR. Amongst others, the Integrated Fire Management Plan, Game	0	Below is the comprehensive list of standalone documents with their revision dates. Included in this list are the conservation management programme (CMP) compiled in 2018 and the

Nr	CONDITION	SCORE	VERIFICATION																																																								
	Introduction Plan, Archaeological Conservation Management Plan, Stormwater Management Policy, Landscaping Guidelines, Deed of Trust and HOA Articles. These are standalone documents which have been endorsed by, for instance CapeNature (Game Introduction Plan) and Heritage Western Cape (Archaeological Conservation Management Plan), thus their contents is not repeated in this EMPR although they are referenced and included as Appendices. These documents are specific and to avoid the excessive updating and resubmission of the EMPR every time that one of these documents are revised or slightly adjusted, it is recommended that the EMPR be adopted with the understanding that the Pinnacle Point Home Owners Association (PPHOA) maintain updated versions of all appendices at all times and present such to the DEA&DP for information. Updated versions of any of the appendices must be noted and reported in the annual audit and the EMPR updated to reflect significant changes (to Addendums also) every two (2) years from date of approval.		golf course management plan (GMP) compiled in 2019. The conditions of these additional plans are included in the scope of this audit. <table border="1"> <thead> <tr> <th>App</th><th>Document</th><th>Date</th><th>Rev</th></tr> </thead> <tbody> <tr> <td>A</td><td>ROD Amended environmental authorisation</td><td>29/10/2003 9/10/2013</td><td>1</td></tr> <tr> <td>B</td><td>Integrated fire management plan</td><td>07/2010</td><td>1</td></tr> <tr> <td>C</td><td>Archaeological conservation management plan & HWC Endorsement</td><td>02/2014 9/05/2014</td><td>1</td></tr> <tr> <td>D</td><td>Homeowners association Articles of Association 2004/021284/08</td><td>17/12/2004</td><td>1</td></tr> <tr> <td>E</td><td>HOA House rules</td><td>19/03/2024</td><td>3</td></tr> <tr> <td>F</td><td>Deed of Conservation Trust</td><td>20/09/2007</td><td>1</td></tr> <tr> <td>G</td><td>Architectural code</td><td>02/2021</td><td>6</td></tr> <tr> <td>H</td><td>ARC Storm water management guidelines</td><td>10/2009</td><td>1</td></tr> <tr> <td>I</td><td>Landscaping guidelines</td><td>09/2009</td><td>1</td></tr> <tr> <td>J</td><td>Game Introduction management plan & CapeNature endorsement</td><td>09/2012 19/03/2013</td><td>1</td></tr> <tr> <td></td><td>DWA General Authorisation 16/2/7/K101/B19</td><td>30/03/2013</td><td>1</td></tr> <tr> <td></td><td>Conservation management programme (CMP)</td><td>12/2018</td><td>1</td></tr> <tr> <td></td><td>Golf course management plan (GMP)</td><td>02/2019</td><td>1</td></tr> </tbody> </table> The following documents are in the process of being updated Archaeological Conservation Management Plan, HOA House rules, and Architectural Code and ARC Stormwater Management guidelines. The EMPR specifies a requirement for updates every two years, with the responsibility falling on the PPHOA to ensure compliance. It appears that while there was an attempt to update the EMPR in 2019, it hasn't yet been approved. The lack of updates in 2017, 2020, and 2023 still represents a deviation from the specified timeline outlined in the approved EMPR, which requires updates every two years. Previous Audit (2018) Recommendation: A revision of the EMPR is necessary, as well as the development of the Conservation Management Plan. – Development of CMP completed - Compliant	App	Document	Date	Rev	A	ROD Amended environmental authorisation	29/10/2003 9/10/2013	1	B	Integrated fire management plan	07/2010	1	C	Archaeological conservation management plan & HWC Endorsement	02/2014 9/05/2014	1	D	Homeowners association Articles of Association 2004/021284/08	17/12/2004	1	E	HOA House rules	19/03/2024	3	F	Deed of Conservation Trust	20/09/2007	1	G	Architectural code	02/2021	6	H	ARC Storm water management guidelines	10/2009	1	I	Landscaping guidelines	09/2009	1	J	Game Introduction management plan & CapeNature endorsement	09/2012 19/03/2013	1		DWA General Authorisation 16/2/7/K101/B19	30/03/2013	1		Conservation management programme (CMP)	12/2018	1		Golf course management plan (GMP)	02/2019	1
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Nr	CONDITION	SCORE	VERIFICATION
			Previous Audit (2018) finding: OEMP to be updated every 2 years from date of approval The OEMP was updated to address issues from the 2015 audit. It has, however, not yet been approved by the Department of Environmental Affairs and Development Planning and is therefore not yet being implemented. Correction action required: Ensure that all OEMP revision requirements from this audit is addressed and make the revised OEMP subject to public participation with this audit report – Not yet updated Previous Audit (2018) recommendation: It is further recommended that the annual audit requirement be amended. An internal audit can be undertaken annually, but an audit as a legal requirement does not need to be annual. This will allow time for management to implement new recommendations and adapt to revisions of the EMPR – Not yet updated Previous Audit (2024) Recommendation: Update EMPR every 2 years or request approval from CA to change update frequency – Not yet updated Recommendation: Update EMPR every 2 years or request approval from Competent Authority to change update frequency
	1.2 Purpose of the EMPR		
3	The purpose of this EMPR is to ensure that the environmental impacts and management of the various phases of the development on the receiving environment are managed, mitigated and kept to a minimum. These phases include existing dwellings, construction of new dwellings, management of open space areas and overall sustainability. The EMPR provides guidance and assistance to the PPHOA members and visitors to maintain the pristine integrity of the area in terms of its biodiversity, social nature and sense of place. The ultimate goal is to ensure conservation based objectives within an urban environment. The EMPR must provide easily understood and clearly defined actions that should	4	As noted, Clause 110 of the Deed of Sale (for the transfer of any property), as well as the PPHOA Memorandum of Incorporation imposes an obligation to comply with the EMPR and EA. Hard copy and electronic copy of the approved EMPR is available at the PPHOA office. The approved EMPr is available on the Pinnacle Point website. The first update of the EMPR has not yet been approved by DEA&DP. https://pinnaclepointestate.co.za/wp-content/uploads/2019/02/EMPR-Pinnacle-Point-Final2019.pdf

Nr	CONDITION	SCORE	VERIFICATION
	be implemented during each phase of the development of the Resort. The EMPR is a dynamic document that is flexible and responsive to new and changing circumstances. The document is binding on the Holder of the EA (PPHOA), all homeowners, property owners, all contractors and sub-contractors and visitors to the site. The EMPR must be included as part of any tender documents/agreements as well as contractual documents between the proponent or individual land owners and any contractors. Copies of this EMPR must be kept on site and all home and land owners are expected to familiarise themselves with the content of this EMPR		
	1.3 Status of the EMPR		
4	It is of utmost importance that this EMPR be read in conjunction with any legally obtained authorisations such as an environmental authorisation (EA) or municipal certification. Should the EA contain conditions that contradict any points in this EMPR, the conditions in the authorisation supersede this EMPR. This EMPR is viewed as a dynamic document that should be reviewed and updated on a continual basis. This EMPR must be accepted and approved by the Department of Environmental Affairs & Development Planning (DEA&DP) in order for it to become a legally binding document.	4	Compliance evaluation with the EA conditions is included in this audit. Proof of EMPR approval by DEA&DP Ref EG12/2/1/74/3865(B) received on 27/08/2014.
	2. SITE DESCRIPTION AND LOCAL CONTEXT		
	2.2 Site Amenities		
5	1. The PPHOA must ensure that the St Blaise Trail remains open to the general public as well as residents and visitors to the estate. Existing access control points on the St Blaise Trail must be maintained and record must be kept of people moving through these points. 2. Fisherman intending on fishing after 14:00 must sign in at the PPHOA/Security Gate and must be escorted to the location they wish to go to. 3. Due to heritage significance of the caves, access is controlled. The caves may only be visited via scheduled guided tours where number	4	1. Open to public. Access to St Blaise Trail is controlled. Main gate register for September 2025 below.

Nr	CONDITION	SCORE	VERIFICATION
	of people is limited. Monitor footage of cameras at the caves and report criminal or damaging actions to the local police and Heritage Western Cape		 SHIFT SUPERVISOR:  2. Main gate Fisherman register for September below  3. Email from Dr Nilssen on 17/10/2025: Only cave 13B is visited by the public through the Point of Human Origin (PoHO) tourism initiative Public access to the Pinnacle Point Estate and the remainder of the World Heritage Site (WHS) is restricted and is adequately managed by the PPHOA. Cave tours are done weekly by Point of Human Origins. Criminal activity will be identified during these tours. No criminal activity has yet been reported

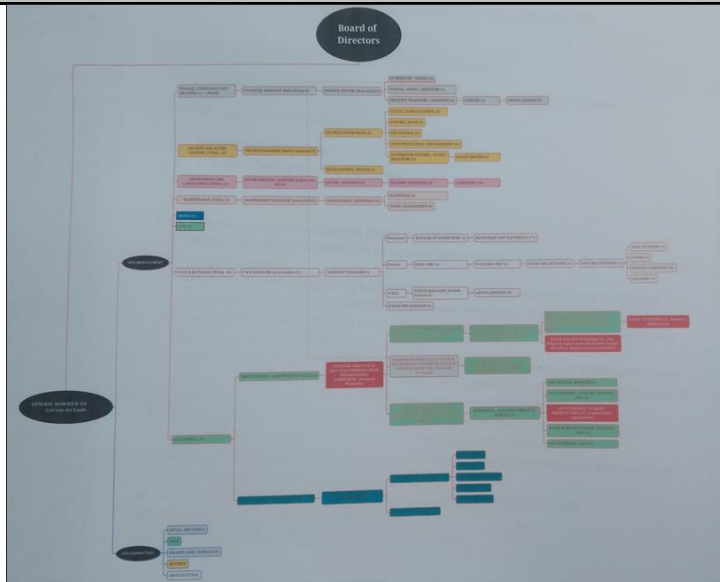
Nr	CONDITION	SCORE	VERIFICATION
	2.3 Social Responsibilities		
6	Pinnacle Point Beach & Golf Resort as a funding agent, in collaboration with the Mossel Bay Municipality and a number of other local businesses, are involved with community projects, amongst others development of the Hayway Park Sportsfield facilities in Ward 2 of Mossel Bay district (Mossel Bay IDP 2012-2017).The Municipality is also in the process of establishing Service Level Agreements with all coastal property owners to ensure controlled public access to coastal areas for recreational and fishing purposes.	4	These projects were applicable during the construction phase and not active anymore. PPHOA have other community projects as part of their social and ethics requirements such as Heart2Heart initiative and the Louis Oosthuizen Golf Academy. The Stinger GC Foundation is the charitable arm of the Stinger GC golf team, focused on uplifting communities in South Africa through healthcare, social welfare, environmental conservation, and golf development.PPHOA is contributing to this foundation.  PPHOA provides access to St Blaise Trail.

Nr	CONDITION	SCORE	VERIFICATION
	2.5 Conservation Areas		
7	PPHOA entered into lease agreements with the Mossel Bay Municipality for three areas (owned by the Municipality) to be managed as part of their conservation area. These areas include: Internal conservation areas with linking corridor function; • Portion of Erf 2001 of approximately 60ha for a period of 9 years and 11 months ceded to the PPHOA on 27 July 2012; • Portion of Erf 2001 of approximately 118.3ha for a period of 9 years and 11 months ceded to the PPHA on 27 July 2012; and • Portion of Erf 2001 of approximately 111ha for a period of 99 years ceded to the PPHA on 20 November 2012. <u>This portion is excluded from the area deemed to be the “conservation area” in as far as this EMPR refers.</u> Conservation areas may not be used in any way that is not compatible with a zoning appropriate for a nature conservation area/ reserve. The leased land shall be rehabilitated and managed by the PPHOA in accordance with best practise principles. Focus rehabilitation on ongoing alien clearing, ecological fire management, and sustainable game management. Each of these corner stone actions are dealt with in this EMPR with particulars contained in the Integrated Fire Management Plan, FMP (Appendix B to EMPR) and Game Management Guidelines, GMG (Appendix J). The rezoning of the leased areas from Undetermined to Open Space or an equivalent Conservation zoning must be enforced within 12 months from the date of approval of the EMPR. The existing Conservation Areas Plan should be used as the basis for development of the Conservation Management Plan The Terms of Reference stipulated in the EMPR pg 10 & 11 should be used to inform the Conservation management Plan The Conservation Management Plan must be developed by a suitably qualified or experienced professional who has sufficient knowledge and understanding of conservation management within an urban/coastal	SE	Refer to Table 5_PPHOA Audit checklist EA conditions nr 25: Extra conditions of approval nr 2 The Conservation Management Programme (CMP) was developed in 2018. The terms of reference stipulated in the EMPR was used to inform the CMP. Refer to 9L CMP section 1.5 Terms of Reference. The CMP was developed by a suitably qualified professional with sufficient knowledge as stipulated in the CMP, qualification of the author stipulated in the CMP report.

Nr	CONDITION	SCORE	VERIFICATION
	environment. The Management Plan must be developed within 12-months from the date when the EMPR is approved by the Department.		
	3 LEGISLATIVE REQUIREMENTS		
	3.1 National Environmental Management Act & 3.2 Environment Conservation Act		
8	The conditions of Record of Decision 29/10/2003 Ref nr EG12/2/1/1-74-ERf 2001&ERf 3438 Pinnacle Point Golf Estate (3865B) Section G are to be adhered to.	SE	Refer to Table 5_PPHOA Audit checklist EA conditions.
9	The conditions of Amended Environmental Authorisation 9/10/2013 Ref nr: 16/3/1/5/D6/28/0011/13 Section C is to be adhered to.	SE	Refer to Table 5_PPHOA Audit checklist EA conditions.
	3.3 National Waste Management Strategy		
10	Implement Integrated Waste Management	SE	EMPR section 5.13 Waste Management
	3.4 National Environmental Management: Integrated Coastal Management Act (Act 24 of 2008)		
11	Conservation of the coast	SE	EMPR section 2.5 Conservation areas, 5.6 Alien vegetation management plan, and 5.7 FMP & 9B FMP conditions.
12	Provide public access to the natural/cultural resources in the coastal zone.	SE	EMPR section 2.3 Social Responsibility
	3.5 National Building Regulations and 3.6 SANS 10400		
13	The National Building Regulations and Building Standards Acts must be complied with.	SE	Refer to Architectural code 07/2018 & Landscaping guidelines 09/2009
	3.7 Conservation of Agricultural Resources Act (CARA)		
14	Erosion control Invasive species	SE	EMPR section 2.5 Conservation areas, 5.6 Alien vegetation management plan, and 5.7 FMP & 9B FMP conditions.
	3.8 National Forests Act		
15	License application for trimming and/or removal of protected tree	SE	EMPR section 5.14: Authorisations permits and licences
	3.9 National Water Act		

Nr	CONDITION	SCORE	VERIFICATION
16	Golf course irrigation requires authorisation in the form of a general License.	SE	DWA general authorisation 16/2/7/K101/B19 on 20/09/2013 for irrigation with treated effluent. Refer to Table 9: Compliance evaluation of the DWA General Authorisation section 9K
	3.10 National Veld and Forest Fire Act		
17	Integrated Fire Management Plan(FMP)	SE	EMPR section 9B FMP 2010
	3.11 National Heritage Resources Act		
18	Archaeological Conservation Management Plan (ACMP). This ACMP has been revised over time with the final version having been accepted and approved by HWC on 9 May 2014.	SE	EMPR section 9C ACMP 2014.
	3.12 Occupational Health and Safety Act.		
19	Health and safety provisions for workers on the estate	4	Health and safety requirements stipulated in the Landscaping guideline 09/09: 2.9 <i>"All OHSACT & labour regulations must be adhered to for all staff, by the specific contractors"</i> . PPHOA appointed 24 Law Health and Safety Legal Compliance to ensure compliance with all health and safety requirements.

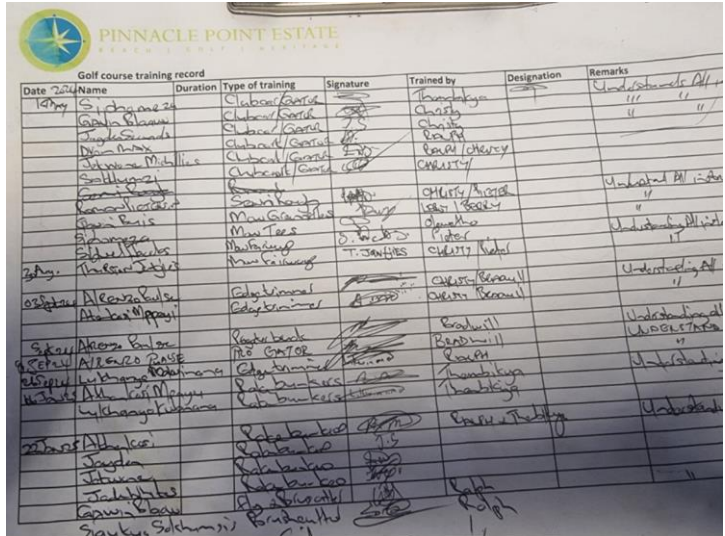
Nr	CONDITION	SCORE	VERIFICATION
			TWENTY2 FOUR LAW 24LAW 24LAW Document: Pinnacle Point Estate (HOA) Legal Audit Report Legal OHS Certificate / Audit Report DESCRIPTION AREA DATE OCC CONTROL AUDITOR AUDITOR REGISTRATION WITH PROFESSIONAL BODY REG NO / STATUS Private Seal ISSUED TO: Pinnacle Point Estate (HOA) TRADING AS: Pinnacle Point ADDRESS: Pinnacle Drive, Mossel Bay, 6510, South Africa. Coordinates: 34°12'28"S 22°05'22"E / 34.20778°S Certificate Reference: OHS-PP/24/LAR/2025/06 Date/Duration of Audit: July 2025 Date of Issue: 2025/07/01 24LAW - TWENTY FOUR LAW HEADOFFICE: BEACHVIEW HOUSE BUILDING 111 Pinnacle Drive, BEACHVIEW, 6510, South Africa Phone: 029 261 2400 Email: info@24law.org.za 2025/07/01 KEVIN 1. INTRODUCTION This report serves as formal verification that Pinnacle Point Estate equips a legally compliant Occupational Health and Safety Management System (OHSMS), in accordance with the Occupational Health and Safety Act 85 of 1993 (OHS Act) and its applicable Regulations. The audit was conducted by 24 Law, acting as the appointed Legal Compliance with Power of Attorney to ensure compliance for and on behalf of Pinnacle Point Estate. The purpose is to assess, verify, and document that the prescribed minimum legal requirements and related management documentation are in place, maintained, and operational for the six-month period ending 30 June 2025. This audit also confirms that the Pinnacle Point Health and Safety File and related documents are securely stored and available via the official OneDrive repository. Any external party requiring access must submit a written request to kevin@24law.org.za for authorization before access will be granted. In the 1 July 2025 Audit report above it states that PPHOA maintains a legally compliant and operational Health and Safety Management System.
	4. ROLES AND RESPONSIBILITIES		
	4.1 Pinnacle Point Beach & Golf Resort Home Owners Association		
20	The PPHOA is supervised by the Estate General Manager (GM) who is the highest ranked individual within the operation with an overall responsibility to ensure procedural correctness and compliance with all statutory obligations. The GM oversees individual Department Managers which inter alia include the Director of Golf, Technical Manager and the Estate Conservation Officer (ECO). The PPHOA is managed in terms of a formal Constitution (as adopted by the ELC) which defines its role and legal responsibilities along with the	2	The PPHOA agree with these stipulated responsibilities. Compliance with this is verified by audits. Current 2025 organogram:

Nr	CONDITION	SCORE	VERIFICATION
	Article of Association of the HOA (attached in Appendix D to EMPR). These responsibilities, relevant to the receiving environment, include but are not limited to the following: • Be conversant with the EMPR, any relevant Environmental Authorisation, Waste License, Permit or any other legally binding documentation; • Ensure that the senior site personnel are aware of and understand the conditions and recommendations contained in the EMPR, any relevant EA, Waste License, Permits or any other legally binding documentation; • Order the removal of any person(s) and / or equipment found in contravention of any of the above mentioned authorisations.		 Previous Audit (2024) Recommendation: Update EMPR with current organogram – EMPr not yet updated Recommendation: Update EMPR to reflect updated organogram
21	The PPHOA is responsible for enforcing the <i>House Rules</i> (as adopted by the ELC) made in terms of the articles of the HOA (copy included in Appendix E to EMPR). Amongst others these <i>House Rules</i> address: Domestic refuse handling/disposal, domestic animals, traffic, sporting facilities, open space allowances, electricity supply, landscaping, accounts, security and other specific rules	4	The PPHOA enforce the HOA house rules 19/03/2024. PPHOA does regular inspections and issue penalties for non-compliance. Proof of non-compliance was shown to auditor.
22	The General Manager (GM) must have weekly meetings/communication with his Department Managers where day to day problems or challenges relating to the receiving environment must be discussed. The GM as well as the various Department Managers must prepare reports forthcoming	4	GM meetings on ad hoc basis when required. Minutes of meetings available on request.

Nr	CONDITION	SCORE	VERIFICATION
	from these sessions for presentation to the PPHOA who should meet on a regular basis. Urgent matters must be communicated via email to ensure that the necessary actions are not delayed unnecessarily.		
	4.2 Technical Division		
23	The Technical Manager reports directly to the GM and his responsibilities are: 1. Contractor induction, compliance with architectural guidelines, stormwater management and waste management fall within his/her scope of works. 2. To this end an architectural review committee (ARC) has been established to assist the PPHOA in compliance with the Architectural Guidelines (Appendix G) which has been adopted by the ELC. 3. The PPHOA, with input from the ARC, must approve the <i>Architectural Code Checklist</i> that must be completed by each property owner for construction on all free standing plots on the Estate (copy of Checklist included with Appendix G). 4. <i>Stormwater Management Policy Guidelines</i> that were developed particularly because of the varying soil profiles and steep slopes at Pinnacle Point Beach & Golf Resort. According to this Policy detailed plans to control and prevent erosion by water must be agreed with the PPHOA's ARC prior to the commencement of any works on any portion of the Estate. The stormwater guidelines forms part of the internal house plan approval process for all plots. A copy of this <i>Guideline</i> document is included as Appendix H. 5. As with the architectural requirements the PPHOA ensures compliance with the Stormwater Management Policy through a system whereby the PPHOA must approve the stormwater design plan for each (all) plots on the Estate. A copy of this approval form is included with Appendix H.	2	These responsibilities fall under the General Manager (GM). Responsibilities are being conducted. The signed off handover checklist for each property is kept on file at the PPHOA office. Previous Audit (2024) Recommendation: <i>Update roles and responsibilities according to the current organizational structure, although responsibilities are still the same they have been reallocated to different roles and should be reflected as such.</i> - EMPr not yet updated Recommendation: Update EMPr with current roles and responsibilities
24	Engineers and Contractors must be: - 1. Conversant with the EMPr, Environmental Authorisation, Waste	4	<i>"It is noted that Clause 110 of the Deed of Sale (for the transfer of any property), as well as the PPHOA Memorandum</i>

Nr	CONDITION	SCORE	VERIFICATION
	License, Permit or any other legally binding documentation - Have a responsibility to adhering to any conditions and recommendations laid out in above mentioned documentation - Prevent actions that may cause harm to the environment - Be responsible for any remedial activities in response to an environmental incident within their scope of influence - Liaise with the ECO/ELC and the PPHOA in the event that any industry regulated standards are in contradiction with the EMPR or any other authorisations. - Review and amend any construction activities to align with the EMPR and Best Practise Principles. - Ensure compliance of all site personnel and/or visitors to the EMPR and any other authorisations.		<i>of Incorporation imposes an obligation to comply with the EMPR and EA."</i> The Construction Environmental Management Plan (CEMP) requirements are incorporated into the following guidelines which future houses have to comply with. Architectural guidelines (2021), Landscape guideline (2009), Stormwater guideline (2003), HOA House rules (2024) and Building rules. Architectural guidelines stipulate in section 1.14 "<i>Environmental management as per the PPHOA EMP must be adhered to at all times during construction</i>". HOA House rules stipulates "<i>to ensure that construction within the estate is carried out in accordance with all applicable laws including, inter alia, the contractors' environmental management programme pertaining to the estate ("the EMP")</i>"; PPHOA does regular inspections to ensure compliance with these guidelines. The CEMP is available at the PPHOA offices. Previous Audit (2024) Recommendation: Upload the CEMP on the website for ease of reference- PPHOA indicated that it is sufficient for the CEMP to be available at the office.
	4.3 Environmental Conservation Officer		
25	- Provide environmental induction training to contractors on site prior to construction activities commencing - Provide maintenance, update and review of the EMPR if necessary - Liaison between the PPHOA, Contractors, Authorities and other lead stakeholders on all environmental concerns, including the implementation of the EMPR; - Compilation of Environmental Control Report to ensure compliance with the EA, EMPR and duty of care requirements, where necessary - Compilation of the Environmental Audit Report or Environmental Completion Statement, after completion of construction, where	0	- Induction training resides with EM. Training material and attendance registers verified by auditor. 2025 Attendance registers available for contractors Rawland, Tinshack, Premier Gardens, E-Power, Prosite, ArnoTrim - Reside with GM - Reside with EM - External audits are conducted. No environmental control reports are compiled during the operational phase. - PPHOA does inspections for construction of new dwellings. Site Handover form for commencement of

Nr	CONDITION	SCORE	VERIFICATION
	necessary 6. Ensuring compliance with the EMPR 7. Ensuring compliance with the Environmental Authorisation or DAFF permit, if applicable 8. Provide guidance and interpretation of the EA and EMPR where necessary 9. Issuing site instructions to the contractor for corrective actions required 10. The ECO is required to conduct regular site visits for the duration of construction period, in order to ensure the contractor receives the necessary induction and that all procedures are in place. Additional visits may be undertaken in the event of any unforeseen environmental accidents. 11. Attendance of site meetings if required. 12. Maintain a record of environmental incidents as well as corrective and preventative measures taken. This information must also be included in the ECR 13. Oversee management of the Conservation areas. 14. Ensure implementation of the alien eradication and fire burning plans 15. Cooperate with archaeological specialist team to ensure appropriate archaeological management		construction and Completion Clearance Certificate was shown to auditor for Lot 319 (12 August 2025) 6. Reside with GM & EM. See 4 above. 7. Reside with EM – Environmental audits 8. Reside with EM 9. Employee, part of the environmental team, issues penalty fines 10. This condition is applicable to the construction phase of the development which has been completed. 11. This condition is applicable to the construction phase of the development which has been completed 12. Comment received during public participation(10 June 2026) Complaint issued by landowner in 2022 to PPHOA regarding ongoing erosion between the 6th and 7th holes, alleged non-compliance with the Environmental Authorisation and potential risks to heritage resources and adjacent properties. Finding Final Environmental Audit Report (Revision 3_17/07/2026): Procedural non-compliance: No proof provided of registered complaint in Environmental Incident/Complaint register. This demonstrates a non-compliance with the requirements of OEMP Section 4.3 <i>“Maintain a record of environmental incidents as well as corrective and preventative measures taken”</i> Recommendation: • Maintain a record of environmental incidents as well as corrective and preventative measures taken. • Record the 2022 complaint retroactively, including corrective and preventative measures taken.

Nr	CONDITION	SCORE	VERIFICATION
			13. Reside with EM 14. Reside with EM. Refer to EMPR section 9B IFM (FMP) 2010 15. Point of Human Origin (PoHO) is responsible for the archaeological management.
	4.4 Environmental Induction and training		
26	The ECO or PPHOA in consultation with the Technical Manager shall ensure that adequate environmental awareness training of senior site personnel takes place.	4	Induction training resides with EM. Training material and attendance registers verified by auditor. 2025 Attendance registers available for contractors Rawland, Tinshack, Premier Gardens, E-Power, Prosite, ArnoTrim Golf employee's environmental awareness training is being done together with the task specific training. E.g. - when they do brush cutter training it includes, how to avoid spills, not to cut into the natural fynbos, only mow downwind to prevent clippings from flying into the fynbos – training registers shown to auditor. 

Nr	CONDITION	SCORE	VERIFICATION
			Previous Audit (2018) finding: <i>The ECO or PPHOA in consultation with the Technical Manager shall ensure that adequate environmental awareness training of senior site personnel takes place. Some issues were found with golf course management that are not compliant with the OEMP. It was found that golf course personnel (of all levels) did not receive environmental awareness training.</i> Correction action required: <i>Provide environmental awareness training for golf course management.</i> - Compliant
27	The ECO or PPHOA in consultation with the Technical Manager shall ensure that all construction workers receive an induction presentation on the importance and implications of the EMPR, as far as possible, in the employees' language of choice. The contractor should provide a translator from their staff for the purpose of translating, should this be necessary.	4	The EM conducts induction training. Induction training material and attendance registers verified.
28	As a minimum, training should include: • Explanation of the importance of complying with the EMPR and the employees accountability; • Discussion of the potential environmental impacts of construction activities; • The benefits of improved personal performance; • Employees' roles and responsibilities, including emergency preparedness; • Explanation of the mitigation measures that must be implemented when carrying out their activities; • Explanation of the specifics of this EMPR and its specification (no-go areas, etc.) • Explanation of the management structure of individuals responsible for matters pertaining the EMPR.	2	Induction training resides with EM. Training material and attendance registers verified by auditor. The induction training includes important environmental instructions (e.g., staying within netted areas, protecting flora and fauna, spill reporting), which align with EMP principles. Attendance registers for 2025 confirm participation by key contractors. Attendance registers available for contractors Rawland, Tinshack, Premier Gardens, E-Power, Prosite, ArnoTrim. The House Rules outline specific transgressions related to environmental harm, reinforcing behavioral expectations on site. (e.g <i>littering, lighting a fire, disturbing, collecting, harming or destroying any flora in open areas or undisturbed areas, chasing, trapping or interfering with fauna, damaging heritage sites etc</i>) In the Architectural guideline the requirement to adhere to the PPHOA Environmental Management Plan during

Nr	CONDITION	SCORE	VERIFICATION
			construction is explicitly stated. Previous Audit (2024)Recommendation: <i>Revise induction training material to ensure inclusion of all these aspects-</i> Not yet updated Recommendation: While contractors are exposed to environmental requirements, the connection to the EMPR could be more direct and explicit. Updating the induction material to clearly reference the EMP and its legal obligations—as recommended in the 2024 audit—would enhance clarity and ensure consistent understanding and compliance.
29	Should the staff turnover be high and with additional appointment of sub-contractors, it may be necessary to undertake additional induction training sessions.	4	Induction training is done annually.
30	The contractor must keep record of all environmental training sessions, including names, dates and the information presented.	4	Induction training registers verified.
4.5 Golf Operations			
31	The Director Golf reports directly to the GM. Amongst others the following responsibilities lie with Golf Operations: • Ongoing monthly training to golf personnel to ensure the correct application of poison, pesticides, herbicides and fertilisers; • Testing for and reporting on soil chemistry and salt balance to ensure optimal quantity of fertiliser is used; • Golf Course drainage and maintenance with associated repairs to reinstate disturbed areas and protect the surrounding natural areas from erosion; • Quality control for irrigation water (treated effluent); • Verify wind speed and direction to prevent overspray of treated effluent onto neighbouring natural areas surrounding the golf course; • Maintain photographic record of natural areas at each course hole as an additional measure to monitor irrigation edge-effect on natural areas surrounding the golf course; and	SE	These responsibilities fall under the Golf Director. Refer to 9M GMP conditions for verification.

Nr	CONDITION	SCORE	VERIFICATION
	Management of turf (kikuyu grass) to ensure that it does not encroach into remaining natural areas surrounding the golf course.		
	4.6 Pinnacle Point Conservation Trust		
32	The PP Conservation Trust was established in terms of condition 15 of the ROD dated 29 October 2003 to oversee the conservation areas through the lifespan of the development. The PPHOA has six (6) different Sub-Committees namely the: 1. Golf sub-committee, 2. Financial sub-committee, 3. Social sub-committee 4. Marketing sub-committee, 5. Architectural sub-committee, 6. Conservation Trust sub-committee (with representatives on the HOA). The conservation areas include all the areas on the estate that are not landscaped and maintained as natural vegetation, inclusive of the land leased from the Mossel Bay Municipality as well as the pockets of natural indigenous vegetation within the Resort that area subject to the Integrated Fire Management Plan.	SE	Refer to Table 5_PPHOA Audit checklist EA conditions nr 15.
	5. OPERATIONAL PHASE ENVIRONMENTAL MANAGEMENT REQUIREMENTS		
	5.1 Annual Compliance Audit		
33	In the absence of an Environmental Liaison Committee (ELC) it is the recommendation of this EMPR that an annual EMPR compliance audit be undertaken as a motion to ensure compliance with the EMPR. (The ELC was a condition of the EA to oversee the construction phase. The ELC has subsequently been disbanded.)	0	Without a specific frequency outlined in the Record of Decision (ROD), the decision regarding the frequency of environmental audits would typically fall under the jurisdiction of the organization responsible for implementing the environmental management plan. In this case, the approved EMPR from 2014 required annual environmental audits. Although annual environmental audits were not conducted between 2016 and 2023, the 2024 audit marks a return to compliance with the approved 2014 EMPR. Until the 2019 revised EMPR is formally approved, the requirement for annual audits remains applicable. Therefore, the absence of audits during the intervening years constitutes non-compliance with the current EMPR, despite the recent

Nr	CONDITION	SCORE	VERIFICATION
			corrective action. Previous Audit (2024) Recommendation: Conduct annual external audits until the revised EMPR, suggesting audits every five years, has been approved by the competent authority. - Annual audits conducted since 2024. Recommendation: Do annual external audits until the revised EMPR, suggesting audits every five years, has been approved by the competent authority.
34	The audit must be undertaken by a suitably experienced, independent individual with sufficient knowledge of golf estate operations and a decent understanding of the EMPR.	4	The auditor worked as a Senior Environmental Scientist for over 19 years' conducting Environmental Impact Assessments and Environmental Audits. Audit qualifications also listed. Please refer to "section 2.1 Expertise of the auditor". in the audit report
35	The main purpose of the annual EMPR compliance audit which must be submitted to the PPHOA must be to: 1. Highlight areas where improvements may be necessary alongside and implementation schedule for implementing such improvements; 2. Non-compliance with the EMPR or EA must be reported with the necessary actions to rectify such non-compliance. 3. The PPHOA must be given a reasonable opportunity (not exceeding 2 months after completion of the audit) to review and comment on the audit report where it will be the responsibility of the PPHOA to 4. Submit copies of the audit report with their Response Report to the Provincial Department of Environmental Affairs & Development Planning, the Mossel Bay Municipality and Heritage Western Cape for their records and/or further actions within two months of completing their Response Report	N/A	This condition is a statement and therefore not scored. 1. The audit will report on • Any new impacts as a result of the activity • The effectiveness of the EMPR • The shortcomings in the EMPR and • The need for any changes in the EMPR. 2. The audit will report on non-compliance with EMPR and EA 3. Noted.
36	Notwithstanding the above procedure the PPHOA must report any deliberate or negligent non-compliance matters that have the potential to cause harm to the receiving environment, to the relevant authority without delay.	N/A	This condition is a statement and therefore not scored. The PPHOA take note of this condition.
5.2 Environmental Monitoring			

Nr	CONDITION	SCORE	VERIFICATION
37	PPHOA must ensure that various checklists developed are completed and submitted to the PPHOA for record keeping:	4	Some of the checklists such were presented to the auditor. 1. Architectural guideline 02/2021 – Site Handover checklist 8/10/2025 2. Archaeological surveys are conducted by Point of Human Origin Point of Human Origins: Archaeological Tours, South Africa . Email with responses was received from Dr Nilssen on 17/10/2025 and has been incorporated into the report. – MOA for Heritage Monitoring 12/08/2025 3. Weekly water flow monitoring by PoHO. (July, September and October 2025)
	5.3 Funding		
38	PPHOA is responsible for funding of all related conservation responsibilities and initiatives ito condition 6 of the EA. The PPHOA is obliged to compile a budget, based on feedback and proposals from each of the individual Department Manager’s programme and plans and this EMPR and supporting documents. (Fire management, alien clearing, educational training and archaeological monitoring)	4	The funding for managing the estate, including the implementation of the Operational Environmental Management Plan (EMPR) and associated appendices and management plans, is provided through levies collected from the homeowners. This ensures that the necessary resources are available to uphold environmental standards, maintain the property, and manage the resort effectively. The Financial Manager has verified the Pinnacle Point Home Owners Association's FY2026 Consolidated Budget in collaboration with the Auditor. PPHOA is confident that the funds allocated for environmental management in previous financial years, as well as those earmarked for upcoming years, are sufficient to ensure continued implementation and compliance with the Environmental Authorisation (EA) and Environmental Management Programme (EMP) requirements. Proof of Email 6/10/2025
39	The annual EMPR compliance audit must reflect on the effectiveness of each year’s budget compared to annual environmental actions/plans to ascertain whether sufficient funds are allocated for conservation/ education purposes.	4	The Financial Manager has verified the Pinnacle Point Home Owners Association's FY2026 Consolidated Budget in collaboration with the Auditor. PPHOA is confident that the funds allocated for environmental management in previous

Nr	CONDITION	SCORE	VERIFICATION
			financial years, as well as those earmarked for upcoming years, are sufficient to ensure continued implementation and compliance with the Environmental Authorisation (EA) and Environmental Management Programme (EMP) requirements. Proof of Email 6/10/2025
	5.4 Ongoing Construction on the Estate		
40	The CEMP must be available for all construction related activities. Future houses that are yet to be constructed must sought compliance with the recommendation of the CEMP.	SE	The hard copy CEMP is available at the PPHOA office. The CEMP requirements are incorporated into the following guidelines which future dwellings/houses have to comply with. Architectural guidelines (2021), Landscape guideline (2009), Stormwater guideline (2003), HOA House rules (2024) and Building rules. Architectural guidelines stipulates in section 1.14 <i>“Environmental management as per the PPHOA EMP must be adhered to at all times during construction”</i>
41	Property owners who wish to construct new dwellings must consult with the PPHOA to ensure that they are familiar and comply with the: • Architectural guidelines • Landscape guidelines • Stormwater Management Policy Guideline	SE	Refer to section 4.2 above
	5.5 Landscaping		
42	The most effective method of preventing garden escapees is to landscape with indigenous vegetation. Adhere to the signed of Landscape Guidelines as adopted by ELC and plant species list.	4	Landscaping guidelines 09/09: section 3.1.1 <i>“Approved estate plant list”</i> . PPHOA does regular inspections. Penalties are issued for any transgressions.
43	No invasive alien plant species may be used for any landscaping purposes.	4	Landscaping guidelines 09/09: section 3.3.1 <i>“Any form of exotic plant that is not indigenous to the Garden Route area, will not be allowed on site”</i> PPHOA does regular inspections. Penalties are issued for any transgressions.
44	The Estate Environmental Control Officer and Technical manager must ensure compliance with the landscaping requirements relevant to their fields of responsibility. The ECO and Technical Manager must report back	4	Landscaping guidelines 09/09: section 2.7 <i>“Penalty System Once a landscaper deviates from the approved plans/guidelines they will be warned firstly. The second time,</i>

Nr	CONDITION	SCORE	VERIFICATION
	any non-compliance to the GM at weekly feedback sessions.		<i>he/she will be given a second and final warning by the HOA. After the third time he/she will lose his/her accreditation to work on the estate".</i> Since January 2025, the PPHOA has issued five penalties following routine inspections, all related to violations within undisturbed areas. These infractions include unauthorized landscaping in undisturbed zones, disturbing or damaging flora in open or preserved spaces, collecting or harming plant material without prior consent from the HOA, and encroaching into designated undisturbed areas. These actions breach community guidelines aimed at preserving the integrity and ecological balance of shared natural environments.
	5.6 Alien Vegetation Management Plan		
45	All alien invasive vegetation should be removed from the area in order to ensure restoration of the indigenous vegetation. Identify the species of plant and implement effective removal actions.(mechanical, chemical or biological)	4	Landscape Guidelines 09/09 "<i>...any form of exotic plant that is not indigenous to the Garden Route, will not be allowed on site.</i> <i>No kikuyu or any exotic grasses may be planted on the Estate.</i> <i>No declared invasive alien plant, shrub, tree or grasses may be planted on the Estate, or in any private property.</i> <i>Clearing of invasive alien vegetation on any vacant erf remains the responsibility of the owner and must be undertaken on a quarterly basis, failing which the PPHOA must clear the erf for the owners account."</i> PPHOA is removing aliens on a daily basis. Alien removal is done in house with dedicated trained staff. The company Natural Environmental Rehabilitation are appointed to assist with the clearing of alien vegetation in the leased areas. Invoices available. Department of Forestry, Fisheries and the Environment (DFFE) conducted an Alien and Invasive Species compliance audit on 28 January 2025. The outcome of the site

Nr	CONDITION	SCORE	VERIFICATION
			visit was positive. Formal feedback from the department is still pending. Also refer to removal of alien/invasive vegetation – EMPR section 5.6
46	Use of general herbicides is discouraged in any areas where contamination of natural areas may occur.	SE	Refer to section 9M GMP section 2.2.5 <i>“The use of chemicals for weed control will be limited as far as possible. Herbicides that prolong in the soil (e.g. pre-emergence herbicides) and may cause detrimental effects on the environment will not be used.”</i>
47	The status of the species identifies the threat and the management actions required to address the threat. The CARA categories...	4	Landscaping guidelines 09/09: section 3.3.4 <i>All declared invasive alien plants, trees, shrubs and grasses are not permitted within the estate and may not be cultivated in erf garden.</i> Section 3.3 <i>“plant species not permitted on site”</i> . The CARA regulations have been superseded by the NEMBA Regulations which became law on 1 October 2014.
5.6.1 Herbicide application			
48	Foliar applications: - Foliar applications should be made with a low pressure (20-50 psi) backpack sprayer at rates of 4liters per minute - All foliar treatments should be made after full leaf expansion in the spring and before autumn (before end of April) - Allow herbicide treatments to dry for at least three hours at an air temperature above 18°C. In other words, do not spray on days where rain is expected; - It may be necessary to close off treatment areas for access until the herbicide is completely dried - Use a non-ionic surfactant with all herbicide solutions used for foliar spraying. - Apply herbicide with a backpack or similar hand-operated pump sprayer equipped with a flat spray tip or adjustable cone nozzle. - Apply herbicide to the leaves and stems to target plants using a consistent back and forth motion.	4	The Golf course superintendent is a certified pest control officer that oversees the spraying of herbicide. Only pest control officer issues approval of spot treatment and any spraying. Dr A Schoeman (Entomologist) is consulted when required. No herbicide applications are conducted when rain is expected. Herbicide is applied with a backpack. Herbicide application is done accordingly. Chemical control sheet below shows spraying on greens and tees. Proof of Certification below.

Nr	CONDITION	SCORE	VERIFICATION
	- Herbicide should thoroughly cover foliage, but not to the point of run-off. - Triclopyr herbicide requires complete foliar coverage to be effective. - Applications made while walking backward will reduce the risk of the herbicide getting onto the applicator's clothing.		  Pest control operator registration certificate
49	Cut stump applications: - Horizontally cut the stems at or near ground level - All cuts should be level, smooth and free of debris	4	Herbicide application is done accordingly.

Nr	CONDITION	SCORE	VERIFICATION
	Immediately apply the herbicide to the outer 20% of the stump		
50	Alien clearing in the conservation areas must be in line with the fire management plan to ensure that fire management units that are designated to be burned in a controlled manner are cleared of invasive alien vegetation at least one (1) year prior to a controlled burn. Six (6) month follow-ups must be undertaken within each of the identified fire management units until such time as the unit is burned and thereafter to reduce the presence and spreading of invasive alien plants between relevant fire management units.	4	The company Natural Environmental Rehabilitation are appointed to assist with the clearing of alien vegetation in the leased areas (Conservation areas). Refer to the figure below showing 2025 alien clearing blocks. Department of Forestry, Fisheries and the Environment (DFFE) conducted an Alien and Invasive Species compliance audit on 28 January 2025. The outcome of the site visit was positive. Formal feedback from the department is still pending. Refer to Table 8_PPHOA Audit checklist EMPR section 5.6 removal of alien/invasive vegetation. 
51	Open space and landscaped areas within the Estate that fall outside the formal conservation area must be cleared of invasive alien vegetation on a continuous / weekly basis.	4	Alien removal is done in house with dedicated trained staff. See above for 2025 alien clearing programme.
52	Alien clearing and management is the responsibility of the Estate Environmental Conservation Officer (ECO) who in consultation with the Conservation Trust oversees implementation.	4	Alien clearing is the responsibility of the environmental manager during the operational phase.

Nr	CONDITION	SCORE	VERIFICATION
53	Report back on non-compliance to the GM at weekly feedback sessions.	4	No non- compliances was reported.
54	The PPHOA must guarantee that sufficient funds are available to ensure effective alien clearing across the Estate. Such financial planning must be reflected in the annual budget.	4	The Financial Manager has verified the Pinnacle Point Home Owners Association's FY2026 Consolidated Budget in collaboration with the Auditor. PPHOA is confident that the funds allocated for environmental management in previous financial years, as well as those earmarked for upcoming years, are sufficient to ensure continued implementation and compliance with the Environmental Authorisation (EA) and Environmental Management Programme (EMP) requirements. Proof of Email 6/10/2025
5.7 Fire Management/Protection			
55	The PPHOA has access to firefighting equipment in the event that a small fire requires extinguishing. In case of emergency incidences the Eden District Municipality's Emergency Response number is: 10177 .	4	Comply
56	Pinnacle Point Beach & Golf Resort is currently a member of the South Cape Fire Protection Agency (SCFPA). It is recommended they remain such in order to benefit from the Agency's support as well as training. The ECO responsible for overseeing fire management must ensure that all responsible personnel involved with fire management at the Resort attend the SCFPA's One-Day Basic Fire Fighting Course prior to taking on fire fighting responsibilities.	4	PPHOA membership of the Southern Cape Fire Protection Association has been renewed and valid until March 2026. The 2024 audit report confirmed fire training conducted for sixteen employees

Nr	CONDITION	SCORE	VERIFICATION																								
			 Tax Invoice Pinnacle Point Home Owners Ass - NPC PO Box 1790 Mossel Bay 6501 VAT Number: 446 021 7112 Invoice Date 1 Apr 2025 Account Number 268 Invoice Number 990-096 Reference 268 - 25/26 Membership VAT Number 430263H-39 Southern Cape FPA 3rd Floor Ocean Centre Main Road Knysna, 6570 Tel: 044 332 6912 Email: adminfpa@telkomia.net <table border="1"> <thead> <tr> <th>Description</th><th>Quantity</th><th>Unit Price</th><th>Amount ZAR</th></tr> </thead> <tbody> <tr> <td>Membership Fee - 2025/2026</td><td>1.00</td><td>5,006.17</td><td>5,006.17</td></tr> <tr> <td colspan="4">Membership valid until 31 March 2026. Membership certificate available on request, after payment received.</td></tr> <tr> <td></td><td></td><td>Subtotal</td><td>5,006.17</td></tr> <tr> <td></td><td></td><td>TOTAL VAT</td><td>790.63</td></tr> <tr> <td></td><td></td><td>TOTAL ZAR</td><td>5,797.10</td></tr> </tbody> </table> Due Date: 1 May 2025 Southern Cape Fire Protection Association ABSA Cheque Account Account number: 627 0144 056 Branch Code: 632 005	Description	Quantity	Unit Price	Amount ZAR	Membership Fee - 2025/2026	1.00	5,006.17	5,006.17	Membership valid until 31 March 2026. Membership certificate available on request, after payment received.						Subtotal	5,006.17			TOTAL VAT	790.63			TOTAL ZAR	5,797.10
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57	Fire management is the responsibility of the Estate Conservation Officer (ECO) who in consultation with the Conservation Trust oversees implementation of the Integrated Fire Management Plan. Both parties must ensure compliance with the Plan.	2	Fire management at Pinnacle Point is overseen by the PPHOA in accordance with the Fire Management Plan (FMP), which outlines prescribed burning requirements through 2028. However, the Environmental Manager (EM) has confirmed that current fire fuel reduction is being implemented through brushcutting and the removal of dead plant material, while carefully preserving the seed bed. This approach aligns with the FMP and avoids the use of burning, which has proven to be impractical and poses significant risks to nearby residential properties. Experience has demonstrated that reducing fuel loads—such as dry leaves, twigs, and branches—effectively lowers wildfire intensity and spread. Mechanical clearing methods like brushcutting also support the maintenance of firebreaks, enhance safety near homes, and preserve ecological integrity by allowing native vegetation to regenerate naturally.																								

Nr	CONDITION	SCORE	VERIFICATION
			While burning remains a component of broader fire management strategies, brushcutting and debris removal are currently the preferred and more viable alternatives in sensitive or densely populated areas. Firebreak documentation for Block 13 has been completed (see photos below). Given the high impact and risks associated with burning near homes, the EM is consulting a fire specialist to reassess the current strategy. A formal reconsideration of the burning approach is now underway 

Nr	CONDITION	SCORE	VERIFICATION
			

Nr	CONDITION	SCORE	VERIFICATION
			 Recommendation: Update the Fire Management Plan to reflect current practice and programme.
58	The ECO and representative of the Conservation Trust must report back on any non-compliance to the GM at weekly feedback sessions.	N/A	The ECO was appointed to oversee the construction phase of the development which has been completed.
59	The PPHOA must guarantee that sufficient funds are available to ensure effective fire management as per the Plan. Such financial planning must be reflected in the annual budget.	4	The Financial Manager has verified the Pinnacle Point Home Owners Association's FY2026 Consolidated Budget in collaboration with the Auditor. PPHOA is confident that the funds allocated for environmental management in previous financial years, as well as those earmarked for upcoming years, are sufficient to ensure continued implementation and compliance with the Environmental Authorisation (EA) and Environmental Management Programme (EMP) requirements. Proof of Email 6/10/2025
5.8 Archaeology Conservation Management			
60	Because this site contains the largest volume and highest quality of prehistoric archaeological record of any development in the Western Cape the heritage authorities requires that an Archaeological	4	An Archaeological Conservation Management Plan was compiled in 2014 and endorsed by HWC on 9/05/2014. Refer to EMPR section 9C ACMP 2014 conditions.

Nr	CONDITION	SCORE	VERIFICATION
	Conservation Management Plan (ACMP) be compiled to ensure proper protection of these features. The environmental authorisation includes reference to the ACMP in Condition 12 of the EA. These sites received Provincial Heritage status in April 2013.		Email from Dr Nilssen on 17/10/2025: An integrated management plan was also developed between 2015 and 2024 for the Pinnacle Point Site Complex (PPSC) as part of United Nations Educational, Scientific and Cultural Organisation (UNESCO) requirements for World Heritage Site (WHS). The integrated management plan was part of the requirements for maintaining the site's status. The integrated management plan was not presented to or reviewed by the auditor during the audit process.
61	An independent monitor approved by Heritage Western Cape must do monthly evaluation of archaeological sites to check for site security, erosion and damages. The PPHOA must ensure that the necessary surveys occur and cover the costs associated	4	PPHOA has appointed MAPCRM (PTY) to do monthly evaluations of the archaeological sites. PoHO guide, Christopher Jantjies, trained by Dr Nilssen is on site most days and thus monitors sites in and around the 13 series rock shelters in the course of conducting tours to cave 13B. Weekly monitoring checks are done measuring the amount of water collected in the buckets, testing pH levels and taking basic chemistry of water. A summary of observations are given through to the PPHOA.
62	Monitor water flowing into the caves: 1. Weekly water monitoring (monitor water dripping into a bucket strategically placed therefore) 2. Regular communication between the appointed independent monitor and the golf course green keeper monitoring water flow. The green keeper must report recommendations from the weekly flow monitoring to the Director of Golf via the Golf Course Superintendent. 3. Submit survey reports to PPHOA and HWC.	4	Water seepage monitoring reports for July, August and September 2025 were presented to the auditor. Summary of observation states that water seepage is stable with no significant increase in measurements (pH, alkalinity, cyanuric acid and chlorine)
63	The ECO is responsible to ensure implementation of the ACMP. The Director of Golf must report recommendations to the GM for action.	N/A	The ECO was appointed to oversee the construction phase of the development which has been completed. Implementation during the operational phase is the responsibility of the General Manager.

Nr	CONDITION	SCORE	VERIFICATION
	5.9 Environmental Awareness & Education		
64	PPHOA in collaboration with the Oyster Bay Reserve Conservation Trust has embarked on a number of environmental training and awareness initiatives which include but are not limited to: - The Oyster Bay Reserve's community conservancy Ranger Project (using local specialists to educate prospective Ranger's in various fields of environmental interest i.e. Archaeologist to inform on the importance of the historical caves at Pinnacle Point; - Guided tours to the Historical Caves (as per the Memorandum of Agreement between the PPHOA, Mossel Bay Archaeology Project Cultural Resource Management (MAPCRM) and Oyster Catcher Trails dated 1 June 2013 according to which: - MAPCRM will from time to time allocate caves that are suitable for public visits by small tour groups not exceeding 12 people; - The PPHOA will grant and maintain access to the caves; and - The tour operator will market, and supply and informed guide to the tour group(s). Initiatives such as these must continue and the PPHOA must maintain a record of all such activities for reference in the Annual EMPR Compliance Audit.	4	The Oyster Bay reserve conservation Trust has been disbanded. Email from Dr Nilssen on 17/10/2025: Guided tours are conducted through PoHO on a daily basis. These are as per the Memorandum of Agreement between the PPHOA and PoHO (represented by Dr Nilssen) dated June 2024 according to which: - Scientists (Prof Marean) provide updated scientific evidence and status of sites and recommend additional sites that may be opened for visitation by small groups to a maximum of 15 people. - The PPHOA grants and maintains access to the caves, and - PoHO markets and supplies an informed guide to the tour groups. This initiative continues to receive support from the PPHOA. Refer to the PPHOA website Caves - Pinnacle Point Estate and Point of Human Origins: Archaeological Tours, South Africa website for information on these caves, cave tours and visits as well as photos, signs and visitor reviews of these tours. https://youtu.be/hjvKMgkP8FE
65	The PPHOA must ensure that relevant information boards (see example below) must be maintained and remain visible for visitors and people to view so that the importance of the Pinnacle Point biodiversity and archaeological relevance are shared.	4	Information boards are visible at the Pinnacle Point start of the St Blaise trail and explain biodiversity and archaeological reference. Email from Dr Nilssen on 17/10/2025: Information boards are present on site and Prof Marean is working on the development and supply of new information board(s) / display(s) to be located in the vicinity of the "mosaic tunnel".
	5.10 Water Conservation and Monitoring		
66	1. PPHOA to maintain a metered record of potable water usage for the Estate or obtain meter readings from Mossel Bay Municipality. These	4	1. Potable water usage records available at the PPHOA office Auditor verified water use records. Monthly consumption

Nr	CONDITION	SCORE	VERIFICATION
	records must be kept and made available for use in the Annual EMPR compliance audit. 2. The approved Landscape Guidelines must be implemented 3. Golf course irrigation volumes must be monitored and monthly reports submitted to the PPHOA. In particular the volume of irrigation water at the golf course holes closest to the protected caves must be highlighted to allow comparative analysis with the archaeological monitoring. These records must be kept and made available for use in the annual EMPR compliance audit		average for the months May to Sep were around 9000 Kiloliters (kL) 2. Landscape guidelines are implemented. 3. Monthly irrigation volumes are monitored. Daily average use also calculated. Auditor verified this.
	5.10.1 Golf Course Irrigation		
67	The Director of Golf and ultimately the PPHOA must ensure that: 1. Wind speed and direction are taken into account when the course is being irrigated 2. Photographic record of natural vegetation at the six designated golf course holes must be recorded with photos being taken at the following locations on a quarterly basis: Holes 1, 2, 4, 10, 16, 18 3. On a quarterly basis do a visual comparison to monitor changes in the vegetation – in the event that the data shows a notable change in the species composition or condition, the irrigation system must be adapted to adjust the irrigation impact. 4. Spray heads must be set to spray at specific distances only not the exceed the golf course footprint 5. Soil samples adjacent to above mentioned golf course holes must be taken regularly (quarterly) to have comparative data from which to determine if any leaching is taking place from the golf course into natural vegetation areas. In the event that the data shows an increase in unwanted chemistry/ salt values the irrigation system must be adapted to adjust the irrigation impact. 6. Daily record must be kept of golf course irrigation volumes through means of metering. These records must be maintained and made available for the Annual EMPR Compliance audit.	2	1. Refer to section 9M GMP conditions section 2.6 “<i>Irrigation water management. Irrigation will be applied in the early morning or late afternoon/evening to reduce evaporation and wind drift, unless additional irrigation is required during the day to prevent heat stress of grass or dilution of fertiliser</i>”. It was confirmed by Golf Course Superintendent that wind are taken into consideration. 2. Photographic records are currently not being maintained at the six designated sites. According to the Golf Course Superintendent, a clear demarcation exists between the course boundary and the adjacent natural vegetation, which is classified as a no-go area. Weekly visual inspections are conducted to monitor any changes in these natural vegetation zones. Due to practical constraints, routine photographic documentation is not feasible. However, photographs will be taken in instances where the natural vegetation is negatively impacted, and again following rehabilitation efforts to document recovery.

Nr	CONDITION	SCORE	VERIFICATION
			 Border between course and Fynbos 3. Visual inspections are conducted weekly. 4. Spray direction and distance of spray heads are inspected daily to prevent spraying into the fynbos. Sprayers are set to overspray the golf course edge by 1 m to accommodate wind blowing water away from the edge. This ensures even coverage. 5. Soil analysis conducted every 3 months is available for holes 4, 15 & 18. See red dot positions on map below. It was explained to the auditor that soil irregularities are expected to be detected through sampling at three key areas, which are considered representative of broader site conditions. Specifically: a. Holes 1, 2, and 4 are indirectly covered through analysis conducted at Hole 4 b. Additional coverage is provided by sampling at Hole

Nr	CONDITION	SCORE	VERIFICATION
			15, which informs analysis for Holes 16 c. Coverage is provided by sampling at Hole 18,m which informs analysis for Hole 10 However, the rationale behind the Environmental Management Programme Report (EMPR) specifying Holes 1, 2, 4, 10, 16, and 18 as sampling points remains unclear. To ensure alignment with environmental monitoring objectives in the EMP this needs to update as part of an EMP update.  6. Records available. Previous Audit (2018) finding: Photographic record of natural vegetation at the six designated golf course holes must be recorded with photos being taken at the following locations on a quarterly basis: Holes 1, 2, 4, 10, 16, and 18. Soil samples adjacent to above mentioned golf course holes must be taken regularly (quarterly) to have comparative data from which to determine if any leaching is taking place from the golf course into natural vegetation areas. In the event that the data shows an increase in unwanted chemistry/ salt values the irrigation system must be adapted to adjust the

Nr	CONDITION	SCORE	VERIFICATION
			irrigation impact. This was being implemented, but the coordinate points provided are inaccurate with some located in the sea. Nobody knows the reason for the monitoring or what to do with the data. The monitoring was therefore terminated. Correction action required: This monitoring was actually suggested in the groundwater study and is a condition of the Water Use Permit for irrigation with treated sewage. Review the OEMP to clarify and improve the monitoring specification.- Not yet updated Previous Audit (2018) finding: Maintain photographic record of natural areas at each course hole as an additional measure to monitor irrigation edge-effect on natural areas surrounding the golf course. This monitoring is not undertaken, as the aim of this monitoring is not clear to the ECO, PPHOA or greenkeeper. Correction action required: Review the OEMP to clarify and improve the monitoring specification – Not yet updated Previous Audit (2024) Recommendation: Review this requirement and explain the reasoning why soil analyses are not conducted on these holes and only on holes 4, 15 and 18. Even though visual inspections are good practice ensure photographs to be taken quarterly at these sites – Not yet updated Recommendation: Update the EMP to reflect the current soil monitoring rationale
	5.10.2 Dual Flush Toilets		
68	All households and ablution facilities should be fitted with dual flush systems.	2	This aspect cannot be enforced however it can be recommended in the guidelines. Architectural guideline is being updated to include these recommendations. <i>Previous Audit (2024) Recommendation: Update guideline document to include this recommendation – guideline document is being updated</i> Recommendation: Update guideline document to include this recommendations.
	5.10.3 Low flow shower heads		
69	The choice of shower is up to the individual owner. Shower heads must	2	See section 5.10.2

Nr	CONDITION	SCORE	VERIFICATION
	have a flow of less than 7 l/min		
	5.10.4 Low Flow Taps		
70	Faucets in bathrooms should have a peak flow of less than 10 l/min	2	See section 5.10.2
	5.10.5 Washing machines		
71	Washing machines in houses should be front loading machines.	2	See section 5.10.2
	5.10.6 Geyser and pipe insulation		
72	All structures should have insulation on geysers and all hot water pipes.	2	See section 5.10.2
	5.10.7 Swimming pools		
73	The following considerations must be implemented on any properties: • Pool covers must be used. • Pool painted with dark colours • Pool water heaters should not be run all year and should be kept at lower temperatures. Ideally not pool heaters should be used. • Well maintained pool equipment • Operate pool filters outside of peak energy use times. • Create a windbreak around the pool using indigenous plants. • Chemical pools are discouraged in preference to salt water or natural pools. • Backwash water may not be discharged onto the ground, but must be collected in a tank and removed from site. Discharge backwash water into a grey water system if one is in place.	2	ARC Storm water guidelines Section 7.3 Swimming pools. 7.3.1 <i>“Back-wash from swimming pools must be discharged into the sewer system”.</i> Architectural code: 21.1 <i>“All swimming pools must comply with the standard building regulations”.</i> Approval received from Municipality to discharge back wash water into the sewer system. <i>Previous Audit (2024) Recommendation: Update guideline document to include this recommendation – guideline document being updated</i> Recommendation: Update guideline document to include this recommendations
	5.10.8 Water wise landscaping		
74	Water wise landscaping principles must be incorporated into the detailed landscape plans. The following principles apply: 1. Grow water wise plants. 2. Group plants according to their water needs 3. Use tougher, low water lawn types such as buffalo(coastal) or kweek (inland); no kikuyu 4. Maintain the garden – remove unwanted plants; plant more perennials than summer annuals.	4	Landscaping guideline 09/09: 3.4.1 <i>“The principles of the Department of Water affairs’ (DWAF), Waterwise gardening programme are supported by the Developer”</i> and the HOA’s House Rules: 3.4.2 <i>“Only a limited range of indigenous plant material is appropriate for planting on this site. The estate’s approved plant list of recommended species defines or will define those species which may only be used on this site to the exclusion of</i>

Nr	CONDITION	SCORE	VERIFICATION
	5. Improve soil and mulch 6. Plant in the right season 7. Water correctly – avoid the heat of the day or windy conditions. 8. Use drip irrigation		<i>all others”</i> 4.5.1 “Permanent irrigation is not allowed, as the landscaped areas are to finally harden off in the later establishment period”. 4.5.2 “Irrigation is allowed for only 3 months to establish the plants and should be reduced or turned off once plants are fully established”. 4.5.3 “Gel products such as Aqua matrix and Terra soil gel can be used to assist establishing plants quicker”. 4.5.4 “Timer systems are allowed for drip irrigation systems. Timer systems for spray irrigation will be allowed if in a sealed controller box and if an irrigation schedule is approved by the PPHOA’s. A Ball valve must be placed before this box.” 4.10.6 “All vegetation should be mulched during site clearance” Alien clearing are ongoing and are conducted continuously throughout the estate.
	5.10.9 Rainwater harvesting		
75	- The PPHOA must promote the installation of rainwater storage tanks at homes. All future dwellings must be fitted with rainwater storage tanks to supplement their municipal potable water supply. - Ideally home owners must refrain from irrigating their gardens with municipal potable water.	2	See section 5.10.2
	5.11 Energy Conservation		
76	- Energy and water conservation initiatives are the responsibility of the ARC in collaboration with the ECO and Technical Manager. - Weekly feedback to GM must report on achieving the initiatives.	4	The golf course is currently irrigated exclusively with treated wastewater effluent. This practice forms a key component of the site's water conservation strategy, reducing reliance on potable water sources and promoting sustainable resource management. Irrigation volumes are available. <i>Previous Audit (2024) Recommendation: Keep record of all energy and water conservation initiatives.- Compliant</i>

Nr	CONDITION	SCORE	VERIFICATION
	5.11.1 Solar panels		
77	It is recommended that solar panels be fitted to dwellings and no three phase connections are allowed.	4	Architectural guideline 02/2021 section 7.6 <i>"encourages the use of solar panels for generating electricity and solar heated hot water systems"</i> . An estimate of about 40% of current properties implemented solar.
	5.11.2 Solar heating water systems		
78	Use of heat pumps is recommended.	2	See section 5.10.2
	5.11.3 Energy Efficient Lighting		
79	- It is required that energy saving lighting fixtures be used throughout the Estate for internal and external lighting. - Use proximity switched for pedestrian lighting - No external High Pressure Sodium or Metal Halide spot or floodlights. - Dispose of Compact Fluorescent (CF) bulbs through recycling stations.	4	Architectural guideline 02/2021 stipulates the following 14.1 <i>"Exterior light fixtures shall use light bulbs of 60 watts or less with energy saving lamps preferred."</i> 14.2 <i>"Lights shall be placed so that they do not shine directly at neighbours"</i>. 14.3 <i>"All exteriors fixtures shall be approved by the PPARC prior to installation"</i>. 15.4 <i>"All entries from streets or footpaths shall have at least one bollard light placed at the intersection of the path to the street or cart path so that light is cast on both the street or cart path and the entry. This light shall be controlled by a photocell"</i>. Fluorescent bulbs are removed by the municipality.
	5.11.4 Energy Efficient Appliances		
80	Follow the Energy Guide labels on appliances to help selection.	2	See section 5.10.2
	5.11.5 Solar Cooling Systems		
81	Use solar cooling systems as opposed to conventional air conditioning.	2	See section 5.10.2
	5.11.6 Evaporative Cooling Systems		
82	Consideration should be given to evaporative cooling systems.	2	See section 5.10.2
	5.11.7 Geyser and pipe insulation		
83	Insulate geysers and hot water pipes	2	See section 5.10.2

Nr	CONDITION	SCORE	VERIFICATION
84	Energy and water conservation initiatives are the responsibility of the ARC in collaboration with the Estate Environmental Officer (ECO) and Technical Manager. Weekly feedback sessions to the GM must report on achieving the above-mentioned initiatives.	SE	Energy and water conservation initiatives are the responsibility of the GM. Refer to section 4.2 above
	5.12 Wildlife Management		
85	- The PPHOA must ensure that these gates are functional. The coastal corridor of approximately 100m wide has remained unfenced and should remain such - ensure game gates 1&2 are open between 6h00 and 18h00 7days/week - control room monitor gates – camera system - control room operator to take snapshots of moving game - shift manager to report issues to security manager - In the event that security breaches are noted, the PPHOA may temporarily close the gates at night (no longer than one week at a time). When gates are closed, Control Room must monitor the gates for faunal movement wanting to make use of the gates. Keep records and make these available for the annual compliance audit. - The Provincial Department of Environmental Affairs & Development Planning should be notified of any permanent changes to the operations of these faunal gates. - A <i>Guideline for Game Introduction & Management</i> is in place for the Estate (see Appendix J) specifically dealing with the recommended game species that may be introduced into the conservation areas as well as their specific habitat requirements, management and monitoring of these species. CapeNature has endorsed this Plan.	4	Game introduction and management plan 09/2012. CapeNature endorsement letter 19/03/2013. A site procedure manual: game gates 1/2014 are implemented. No changes to operations of faunal gates. No new game has been introduced into the conservation area. Two new zebras were born in 2025 and there are currently 8 Zebras. No assessment required as the Zebras are seen regularly. PPHOA appointed Veterinarian Dr Willem Burger to assist with game related needs. Refer to section 9J Game introduction and management plan 09/2012. CapeNature endorsement letter 19/03/2013 Refer to photos of Zebras below Previous Audit (2018) finding: <i>The ECO in collaboration with the Conservation Trust is responsible for implementation of the wildlife monitoring plan. Any problems with game management must be reported to the GM at weekly feedback meetings.</i> Correction action required: <i>This monitoring has not yet been initiated and the ECO is not aware of a specific monitoring plan. Security staff monitors the game on their rounds. This monitoring plan needs to be addressed in the Conservation Areas Management Plan. - Compliant</i> Previous Audit (2018) finding <i>The Conservation Trust must ensure that an annual assessment/audit of overall game management is undertaken by a suitably informed expert.</i> Correction action required: <i>This function must be taken over by either the ECO or general manager. Implement an audit of the overall game management. - Compliant</i> Previous Audit (2018) Finding: <i>The Conservation Trust must ensure</i>

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			that an annual assessment/audit of overall game management is undertaken by a suitably informed expert – Compliant  DEPARTMENT OF ENVIRONMENTAL AFFAIRS LIMPOPO PROVINCE <table border="1"> <thead> <tr> <th colspan="4">CONSERVATION CAMP GAME</th> </tr> <tr> <th>NUMBER INTRODUCED</th><th>BIRTH</th><th>DEATH</th><th>ORIGIN</th></tr> </thead> <tbody> <tr> <td>PLAIN ZEBRA</td><td>2021 Male</td><td></td><td>Pinnacle Point</td></tr> <tr> <td>" "</td><td>2021 HINGE</td><td></td><td>Pinnacle Point</td></tr> <tr> <td>" "</td><td>2022 Male</td><td></td><td>" "</td></tr> <tr> <td>" "</td><td>2022 Male</td><td></td><td>" "</td></tr> <tr> <td>" "</td><td>2023 HINGE</td><td></td><td>" "</td></tr> <tr> <td>" "</td><td>2023 Male</td><td>2023</td><td>Pinnacle Point</td></tr> <tr> <td>10 PLAIN ZEBRA</td><td></td><td></td><td>3/7/2023</td></tr> <tr> <td>CAUGHT OUT AND SOLD</td><td></td><td></td><td></td></tr> <tr> <td></td><td>2025 Male</td><td></td><td>April 25</td></tr> <tr> <td></td><td>2025 Male</td><td></td><td>May 25</td></tr> </tbody> </table> 	CONSERVATION CAMP GAME				NUMBER INTRODUCED	BIRTH	DEATH	ORIGIN	PLAIN ZEBRA	2021 Male		Pinnacle Point	" "	2021 HINGE		Pinnacle Point	" "	2022 Male		" "	" "	2022 Male		" "	" "	2023 HINGE		" "	" "	2023 Male	2023	Pinnacle Point	10 PLAIN ZEBRA			3/7/2023	CAUGHT OUT AND SOLD					2025 Male		April 25		2025 Male		May 25
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86	The ECO in collaboration with the Conservation Trust are responsible for implementation of the wildlife monitoring plan. Any problems with game management must be reported to the GM at weekly feedback meetings.	4	Game is the responsibility of the EM. Refer to section 4.2 above																																																

Nr	CONDITION	SCORE	VERIFICATION
87	The Conservation Trust must ensure that an annual assessment/audit of overall game management is undertaken by a suitably informed expert.	2	Previous Audit (2018) Finding: Review this requirement, consult with an expert on the way forward and update the EMPR accordingly. – no annual assessment required only 8 Zebras left on the estate Recommendation: Only 8 Zebras on site, no need for annual assessment - Update EMP to reflect accordingly.
	5.12.1 Destruction of Natural Habitats and Populations		
88	1. Restrict development and construction activities to planned areas. 2. Clear each building site individually 3. Restrict the footprint of development to the smallest area possible. 4. Preserve undeveloped portions of erven in their natural state 5. Create laydowns in previously disturbed areas or on erf under construction 6. Clear the site in a sequence towards natural areas. 7. Rehabilitate affected areas where possible 8. Manage functional areas appropriately 9. Create indigenous gardens 10. Facilitate search-and-rescue before and during site clearance 11. Facilitate collection of scientific material and information before and during site clearance 12. Leave undeveloped portions of erven unfenced 13. Make provision for and manage ecological corridors 14. Widen ecological corridors where possible where allowing gardens and open space corridors to merge. 15. Swimming pools must be of beach type 16. Use recommended types of security fencing 17. Create continuity with neighbouring properties 18. Where possible, place pipelines and cables underground and rehabilitate 19. Restrict creation of unwanted tracks 20. Use natural materials to surface footpaths	4	1. Sites are fenced off before clearing and search and rescue is carried out before site clearance. Construction waste bins for rubble. 2. See 1. 3. Landscaping guideline 09/09 section 5.3 “No extension of an ervens garden is allowed into immediately adjacent undisturbed areas”. 4. Section 4.11.1 “a minimum of 25% (40% for the footprint erven) of existing erf size shall remain undisturbed during construction, except for an area 2.5metre beyond the perimeter of the building”. 5. See 1. 6. See 1 7. Section 8.3 “after the final inspection the home owner will be required to properly maintain the rehabilitated garden area, by a PPHOA approved and accredited garden service. Failing proper maintenance, the PPHOA will employ such a garden service at the cost of the home owners concerned”. 8. Section 5.1 “the gardening and landscaping activities of an erf owner shall be confined to the physical extent of the pegged residential erven (undisturbed area may not be entered into)”. 9. Section 3.4.2 “only a limited range of indigenous plant material is appropriate for planting on this site. The estate’s approved plant list of recommended species

Nr	CONDITION	SCORE	VERIFICATION
			<i>defines or will define those species which may only be used on this site to the exclusion of all others". Section 3.3.1 "any form of exotic plant that is not indigenous to the Garden Route area, will not be allowed on site".</i> 10. Section 4.9.1 <i>"all search and rescue plants that have been moved off the erven must be noted on the landscape search & rescue form, and issued to the HOA's office".</i> 11. Section 4.9.2 <i>"In order to prevent the search & rescue (especially Red data species) plants being taken off site, HOA's permission needs to be given".</i> 12. Section 4.8.1 <i>"Green corridors are to be created on either side of residential erven to allow fauna to move freely around. A minimum of 1.5m must be kept free away from the cadastral boundary on both sides of the property".</i> 13. See 12. 14. Not applicable 15. Refer to swimming pool requirements section 5.10.7 16. Netted security fencing specified for construction of new dwellings 17. During visual site visit auditor can confirm continuity with neighbouring properties 18. Comply 19. Comply 20. During visual site visit auditor noticed footpath on the side of the road is covered with sand. Below is brushcutting conducted during 9-20 October 2025. During the site visit this was verified.

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89	1. Restrict speed on roads 2. Place warning signage in appropriate places 3. Use appropriate curb designs - no barrier curbs.	4	HOA House rules 19/03/2024 section 6.9 “10km/hr of golf cart driveways and 30km/hr on roads. In the event of any person contravening or failing to comply with, or being deemed to have contravened or failed to comply with any provision of the House Rules contained in Section 6, in the sole discretion of the Association he shall be liable to a penalty up to R10 000 (Ten Thousand Rand) depending on the severity of the offence, and/or temporary suspension of membership of the golf club”.																																																																																																																																																																																																																				

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	5.12.3 Light pollution		
90	1. Reduce exterior lighting and avoid constant lighting 2. Use only long-wavelength or low wattage lights for exterior lighting. 3. Use directional fittings for exterior lights. No direct light sources should be seen from outside the township. 4. Encourage the screening of interior lighting.	4	Landscape guidelines 09/09 section 4.12.2 <i>"Garden lighting is not permitted other than bulkhead lighting units fitted with 45 degree louvers attached to the building itself"</i> . Section 5.11.3 above. The auditor was not on site during the night and cannot confirm this.
	5.12.4 Poaching of local wildlife		
91	1. Educate workers to avoid poaching 2. Patrol the area to ensure that no snares are set 3. Maintain perimeter security to prevent unauthorised access by people and domestic animals 4. Report incidents of snaring to the PPHOA 5. Keep record of incidents 6. Extend the network of footpaths where appropriate to increase patrol areas. 7. Control materials to avoid pollution and damage of fauna 8. Control after-hour access.	4	1. Induction training material includes section 10b <i>"No animals are allowed to be killed or injured"</i> 2. Security patrol the entire estate 24/7 3. See 2 above 4. No snaring incidents reported. No poaching incidents in the last year. 5. Record of incidents will be kept 6. Yes 7. All waste disposed of in waste bins and emptied weekly. 8. Construction personnel only allowed until 18h00. Security access at main gate is controlled.
	5.12.5 Problem animal scenarios		
92	1. Do not allow feeding of wild animals 2. Keep attractive resources out of reach this includes planting of fruit trees too close to dwellings; 3. Keep food out of reach of baboons and monkeys i.e. don't leave a picnic unattended; 4. Exercise rigorous control of edible refuse; 5. Do not leave dustbins outside in easy reach 6. Keep windows and doors securely closed 7. Avoid bird feeders.	4	HOA House rules 19/03/2024 section 2: <i>"Domestic refuse"</i> .
	5.12.6 Domestic animals		
93	1. No domesticated animal may roam outside of the owners property unsupervised	4	HOA House rules 19/03/2024 section 3: <i>"Domestic animals 3.1 All domestic animals are to be kept and retained within the</i>

Nr	CONDITION	SCORE	VERIFICATION
	2. Animals roaming the nature areas unsupervised are liable to be removed from the site at the PPHOAs discretion; 3. The municipal regulations regarding the number of animals that may be kept must be adhered to		<i>erf boundaries as covered in the Municipal by-law under section 156(2) of the Constitution of the Republic of South Africa” 3.4 Animals found running loose without a nametag will be handed over to the SPCA and any costs incurred will be for the owner’s account.” 3.9 Dogs: Maximum of 2 dogs per erf allowed. “ It was confirmed by Golf Course Superintendent that no feeding of francolin and doves are allowed and no nuisance currently experience</i> Previous audit (2015) finding: Section 5.12.5 Problem animal scenarios: Do not allow feeding of wild animals Finding: Francolin and doves are fed by the PPHOA staff to tame these birds and encourage them to frequent buildings as a feature for visitors. Golf course management, however, sometimes find problems with francolin damaging lawn.- Compliant
	5.13 Waste management		
	5.13.1 Recycling		
94	1. Recycling bins placed at central point in the Estate to encourage recycling 2. Bins need to be adequately marked 3. The PPHOA should enter into an agreement with a local recycling organisation for collection of these materials.	4	1. Waste handling at Pinnacle point follows an integrated approach for reducing, collecting, recycling and disposing of waste products generated by residential use. Refuse removal are coordinated by the PPHOA according to the HOA House rules 2024 section 2.15. <i>“Domestic refuse”</i> Table with waste streams and disposal

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			<table border="1"> <thead> <tr> <th>Pinnacle Point Waste Streams</th><th>% of waste generated</th><th>Disposal</th><th>Frequency of collection</th></tr> </thead> <tbody> <tr> <td>Domestic waste (Wet waste)</td><td>70%</td><td>4x GreenJobs - Invisible Waste Bins. Disposal to PetroSA general waste landfill site (G:M:B-)</td><td>Daily</td></tr> <tr> <td>Recyclables (Office paper, plastic, packaging, glass etc)</td><td>6%</td><td>Henqua waste</td><td>2x week</td></tr> <tr> <td>Garden waste (Garden refuse) - mulching are done at Pinnacle Point</td><td>10%</td><td>Louis Fourie Class B (G:C:B-) organic waste site</td><td>Daily from estate Every Friday</td></tr> <tr> <td>Golf course waste (grass clippings, pruning)</td><td>10%</td><td>Louis Fourie Class B (G:C:B-) organic waste site</td><td>Daily in estate Every Friday</td></tr> <tr> <td>Construction waste - for maintenance work. Each contractor is responsible for the construction waste</td><td>3%</td><td>Groot Brak solid waste facility</td><td>1x skip removed 2x month</td></tr> <tr> <td>Hazardous waste (Used oils, lubricants, petrol, diesel, paint, maintenance products, herbicides, pesticides, batteries, solvents)</td><td>1%</td><td>Oiltech</td><td>When required</td></tr> <tr> <td>Fluorescent bulbs</td><td><1%</td><td>Municipality</td><td>When required</td></tr> </tbody> </table> 2. Wheelie bins for each home 3. See table above	Pinnacle Point Waste Streams	% of waste generated	Disposal	Frequency of collection	Domestic waste (Wet waste)	70%	4x GreenJobs - Invisible Waste Bins. Disposal to PetroSA general waste landfill site (G:M:B-)	Daily	Recyclables (Office paper, plastic, packaging, glass etc)	6%	Henqua waste	2x week	Garden waste (Garden refuse) - mulching are done at Pinnacle Point	10%	Louis Fourie Class B (G:C:B-) organic waste site	Daily from estate Every Friday	Golf course waste (grass clippings, pruning)	10%	Louis Fourie Class B (G:C:B-) organic waste site	Daily in estate Every Friday	Construction waste - for maintenance work. Each contractor is responsible for the construction waste	3%	Groot Brak solid waste facility	1x skip removed 2x month	Hazardous waste (Used oils, lubricants, petrol, diesel, paint, maintenance products, herbicides, pesticides, batteries, solvents)	1%	Oiltech	When required	Fluorescent bulbs	<1%	Municipality	When required
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	5.13.2 Garden refuse																																		
95	- Garden refuse, such as pruning's and grass clippings may not be disposed of in the open space areas. - Unwanted germination of seed in natural areas is to be prevented at all costs. Homeowners must take the responsibility of removing or having it removed to a suitable disposal site. Where there is sufficient space and / or mechanisms in place, garden refuse may be composted. No burning of garden waste on site is permitted.	4	- HOA House rules 2024 section 8: <i>"Open spaces 8.3. No person shall discard any litter or any nature whatsoever at any place in the estate other than in such receptacles and in such places as may be set aside for the purpose designated as such by the Association"</i> - HOA House rules 2024 section 2.13 <i>"No burning of rubbish in the Estate is permitted."</i>																																
	5.13.3 Biodegradable refuse																																		
96	- Compost heaps is not advisable due to the potential issues around leaving biodegradable refuse at any place accessible by baboons and monkeys - Worm farms are an acceptable method of composting as they can be kept indoors away from predators. - Waste management is the responsibility of the Technical Manager. Problems with waste management must be reported to the GM during weekly feedback sessions	2	- No compost heaps allowed. See section 5.13.2 - Noted - Waste management is the responsibility of the EM. Refer to section 4.2 above Previous Audit (2024) Recommendation: Update guideline document to include this recommendation – guideline document being updated Recommendation: Update guideline document to include this recommendation																																

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	5.14 Authorisations, Permits and Licenses		
97	Apart from the abovementioned authorisations required for the Estate, the following permits and licenses are also required by land owners within the Estate: Recreational Fishing and Bait Collection Permits must be obtained. Available from the Mossel Bay Post office, or any DEA: Oceans and Coast (previously known as Marine and Coastal Management) office; Forestry permits for the removal or trimming of protected tree species; Archaeological demolition permits for any instance where archaeological remains are exposed that may require relocation. Introduction of game to the conservation area.	4	- Proof of permits: Proof verified during audit - Proof of permits: Proof verified during audit. Permits for Milkwood tree removal applications filed per landowner file. The EM presented an application report and Licence WC-GR-0245-2024-25 for ERf 19324 to auditor - Proof of permits: No additional archaeological permits were triggered. Email from Dr Nilssen on 17/10/2025: Fully compliant and ongoing - Proof of permits: No introduction of game permits was required. No new game were introduced
98	With the exception of introduction of game (Conservation Trust), the ECO is considered to be the responsible party with whom individuals on the Estate can make contact to ensure that they comply and obtain relevant permits / licenses / authorisation as may be required	4	Permit applications facilitation is the responsibility of the EM. Refer to section 4.2.
	6 Decommissioning phase Environmental Management Requirements		
99	In general, should the facility be decommissioned, the following should be undertaken: - Only identified buildings should be removed within a demarcated area to prevent unnecessary damage to the surrounding vegetation; - Materials that can be recycled should be correctly sorted and stacked for removal to appropriate waste stream sites; - The footprint area of the facility must be rehabilitated.	N/A	This condition is applicable to the decommissioning phase of the development. The condition is therefore not scored.
	7 Non-compliance		
	7.1 Procedure for construction phase offenses		
100	The contractor shall comply with the environmental specifications and requirements of this EMPR, any additional EMPR, any EA issued and Section 28 of NEMA, on an on-going basis and any failure on his part to do so will entitle the ECO or PPHOA to impose a penalty.	SE	Refer to section 4.2 Engineers and Contractors.

Nr	CONDITION	SCORE	VERIFICATION
	7.2 Procedures for operational phase offenses		
101	In the event that an offense in terms of the EMPR is identified the recommended process should be followed: 1. The PPHOA shall issue a Notice of Non-compliance to the land owner/ responsible entity, stating the nature and magnitude of the contravention; 2. The land owner shall act to correct the transgression within the period specified in by the PPHOA; 3. The land owner shall provide the PPHOA with a written statement describing the actions to be taken to discontinue the non-conformance, the actions taken to mitigate its effects and the expected results of the actions; 4. In the case of the entity failing to remedy the situation within the predetermined time frame, the PPHOA shall notify the relevant authorities, depending on the nature of the transgression and recommend halting the activity or initiate a Committee investigation into the failure to comply; 5. In the case of non-compliance giving rise to physical environmental damage or destruction, the PPHOA shall notify the relevant authorities; 6. In the event of a dispute, difference of opinion, etc. between any parties in regard to or arising out of interpretation of the conditions of the EMPR, disagreement regarding the implementation or method of implementation of conditions of the EMPR, etc. any party shall be entitled to require that the issue be referred to the PPHOA committee and any specialists.	SE	The PPHOA take note of these requirements and will follow this procedure if any offence is identified or reported. No EMPr offences reported. Environmental incident register at the PPHOA office. No incidents reporting since the previous audits (Refer to section 4.3)
	8 Conclusion		
102	1. The PPHOA must keep record of changes to appendices attached to this EMPR and provide the record and reason for such changes or amendments to the relevant person conducting the Annual Compliance Audit. The results of every audit must be used as a	SE	Refer to section 1.1

Nr	CONDITION	SCORE	VERIFICATION
	guideline for updating and improving the EMPR where necessary. 2. The PPHOA must ensure that the EMPR is updated every two (2) years and all previous versions of the EMPR must be kept on file for future reference 3. This EMPR is a legally binding document and once approved by the DEA&DP the PPHOA has a duty and responsibility to ensure that it complies with all conditions and recommendations contained in the main document as well as in the relevant Appendices		
	9. Appendixes		
	9B. Integrated Fire Management Plan 07/2010		
	2.0 Ecological Fire Management		
103	a. Limestone fynbos should burn within a rotation 15>25 years. b. Proteoid fynbos should burn within a rotation of 12>25 years c. Coastal Thicket should not burn and considered as non-flammable d. Burn only in late summer or early autumn (February – mid April) during hot, dry conditions. e. Do not burn blocks of less than 50 ha.	N/A	This information was taken into consideration to compile the schedule of controlled burns.
	2.4 Schedule of controlled burns		
104	Burning should have occurred as follows: 2008 FMUs 3d, 1a,3a 2010 FMUs 1 c, 2, 3b,c 2011 FMUs 4, 5,6, 7, 12 2012 FMUs 8,9, 10, 11, 13 2013 FMUs 14 2024 FMUs 8,9,13 2025 FMUs 3a,3b,3c,3d,14 2026 FMUs 4,5,6,7,12	2	The FMP includes the portion of Municipal land adjacent to Louis Fourie Road that is planned for development by the Municipality. The affected blocks are 14, 15, 16 and 17. These blocks should no longer be considered part of the Estate for conservation management. Once the cemetery and new road section that are planned in blocks 15 and 16 have been developed, the width and position of fire breaks on the boundary need to be reviewed, as these developments will represent new potential points of ignition Previous Audit (2024) Recommendation: Update the FMP /EMPR accordingly – not yet updated Recommendation: Update EMPR/FMP to include this change
	3.3. Implementation of wildfire mitigation measures		

Nr	CONDITION	SCORE	VERIFICATION
105	Comply with the National Veld and Forest Fire Act (101 of 1998): a. Prepare fire breaks on the side of the boundary b. Have equipment, protective clothing and trained personnel for extinguishing fires c. Do everything in the power of the PPHOA to stop the spread of wild fire from the property.	SE	a. Photos of firebreaks verified. Photos shows fire breaks on the east side and fire breaks on the west side. b. Refer to section 5.7 c. Refer to section 5.7 Refer to section 5.7 for more photos
	3.3.1 Fire Breaks		
106	a. Prepare fire breaks of 10m wide along the inside of the boundaries by brush-cutting twice a year (September/October and March/April) down to ground level. Scatter debris some distance inside of the break, not along the edge. Care should be taken on belts in steep gradients where erosion may occur. b. Establish fire breaks 10m around the entire perimeter of the property c. Establish perimeter tracks along the same alignment as the fire breaks. (3m track; 7 m brush cut fire break) d. The fire breaks in Lease Area A 111ha will need to be established once the agreement for the lease has been signed. Maintain fire break No.2 along the boundary between Leased Area C and Leased Areas A and B as a cut-off break.	SE	Refer to section 5.7
	3.3.2 Trained personnel and equipment		
107	It is recommended that the staffs from the security component of the PPB&GR is provided with appropriate training, in terms of basic principles of wildfire fighting and the use of existing vehicle-mounted fire-fighting unit and equipment such as fire beaters and knapsack water pumps.	SE	Refer to section 5.7
	3.3.3 Membership of the Southern Cape Fire Protection Association		
108	Membership of the SCFPA is recommended as a fire protection measure.	SE	Refer to section 5.7
	3.3.4 Other wildfire mitigation measures		
109	a. Asset Protection Zones: Fuel reduction and landscaping Establish APZ around individual buildings and clusters. At least 3x the height of surrounding vegetation. Where fynbos is removed, non-flammable thicket species can be planted for visual impact.	2	Main office building has an APZ, but not residences. This requirement conflicts with the requirements for footprint erven and wind break planting next to pools. Reconsider this EMP requirement during EMPR review to ensure full

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	b. Fire Wise housekeeping: Decks should be sealed around the sides and debris and combustible objects must be removed beneath them. Clean gutters and other features from debris. Store gas cylinders away from combustible plant material comply c. Construction standards Include as little flammable external material as possible Avoid designs that trap embers or allow build-up of dead plant material d. Dedicated firefighting water supply: Ensure adequate dedicated firefighting water supply that includes pipelines, tanks, pumps and electrical supply. e. Fire manager: Appoint a locally based, experienced fire manager. Detailed planning includes public participation, obtaining burning permits, notification of neighbours, recruitment and application of adequate resources, preparation of fire breaks and tracer belts.		compliance. Refer to section 5.7 Previous Audit (2018) finding: Establish Asset Protection Zones around individual buildings and clusters. At least 3x the height of surrounding vegetation. Where fynbos is removed, non-flammable thicket species can be planted for visual impact. This clause from the Integrated Fire Management Plan was never incorporated into the OEMP for action by landowners to be implemented. It is being implemented by the PPHOA at their buildings. Correction action required: Revise the OEMP to include the implementation of Asset Protection Zones by homeowners according to the recommendations.- Not yet updated Recommendation: Review the APZ requirement and update the EMPR with most effective solution.
	9C. Archaeological conservation management plan 02/2014		
	2. Conservation and Management Goals		
110	i. Develop and set up a management structure to ensure that the ACMP is implemented successfully. This includes establishing a Conservation Trust responsible for ensuring that implementation and financing the ACMP is successful and sustainable ii. Develop a budget in conjunction with PPHOA to ensure adequate funds are available for implementing and financing the ACMP is successful and sustainable. iii. Key archaeological resources or areas should be nominated and proclaimed as Provincial or National Heritage sites, which will ensure that their level of protection can be enforced by the heritage authorities and DEA&DP. iv. Establish current status of archaeological resources and make	4	I. Refer to Table 5_PPHOA Audit checklist EA conditions nr 15. II. Refer to Table 5_PPHOA Audit checklist EA conditions nr 15. III. National Heritage Site proclaimed in 2012 and World Heritage Site in 2024 - refer to website link Caves - Pinnacle Point Estate. IV. The PPSC was proclaimed a PHS in 2012 and a UNESCO WHS in 2024 and hence receive the highest level of protection under the NHRA of 1999. V. Email from Dr Nilssen on 17/10/2025: Done through archaeological monitoring of vegetation clearing and

Nr	CONDITION	SCORE	VERIFICATION
	adequate provision to maintain or improve their condition. v. Develop and effective strategy to avoid and/or minimize impact during construction activities. vi. Implement measures to avoid and/or minimize the impact of pedestrian traffic and activities. vii. Develop and implement measures to avoid and/or minimize the impact of water in the form of erosion and chemical alteration of archaeological sediments and materials. viii. Develop a strategy and schedule for monitoring and reviewing the ACMP. ix. Describe strategies, procedures and processes necessary for interventions such as mitigation. x. Recommend the manner in which archaeological resources are presented to the public to ensure that their significance and values are understood by visitors and local communities. xi. A schedule for implementing different aspects of the ACMP including parties responsible for decisions and actions.		earthworks. VI. House rules 2024 section 7.15 <i>“Access to Heritage sites within estate, as well as PPHOA caves are prohibited, save for specific visits for historical or archaeological research or the like, and only with prior arrangement with the Association”</i>. Email from Dr Nilssen on 17/10/2025: Compliant and done through PPHOA and PoHO VII. Water drip monitoring has led to rehabilitation of an area of golf course near the clubhouse to fynbos. This has been completed. PPHOA has appointed MAPCRM (PTY) to do monthly evaluations of the archaeological sites. Weekly monitoring checks are done measuring the amount of water collected in the buckets, testing pH levels and taking basic chemistry of water. A summary of observations are given through to the PPHOA. Email from Dr Nilssen on 17/10/2025: Done and compliant and monitored by MAPCRM directed by Prof Marean VIII. An integrated management plan was also developed between 2015 and 2024 for the Pinnacle Point Site Complex (PPSC) as part of United Nations Educational, Scientific and Cultural Organisation (UNESCO) requirements for World Heritage Site (WHS). The integrated management plan was part of the requirements for maintaining the site’s status. The integrated management plan was not presented to or reviewed by the auditor during the audit process. IX. Email from Dr Nilssen on 17/10/2025: Other than site PP5-6N&S referred to above, none required at this time

Nr	CONDITION	SCORE	VERIFICATION
			X. Archaeological tours are conducted by Point of Origin; refer to the PPHOA website Caves - Pinnacle Point Estate and Point of Human Origins: Archaeological Tours, South Africa website for information on these caves, cave tours and visits as well as photos, signs and visitor reviews of these tours. Email from Dr Nilssen on 17/10/2025: Information boards – pending updates and displays, PoHO tours, public talks, school groups, education & outreach through newly established PPSC Non-Profit-Company https://youtu.be/hjvKMgkP8FE XI. Implemented
	2.2 Relevant role players and their responsibilities		
	1. Pinnacle Point Conservation Trust		
111	- Board consists of Two trustees PPHOA, one trustee by PPHOA as the Estate EO, one trustee Mosselbay Municipality, one trustee acting as Environmental Officer - To ensure that apart from the EMPR, that the management structure of the ACMP is efficient in gauging the progress and success of the implementation of the ACMP - That the PPHOA approved budget will be managed by the Conservation Trust	SE	Refer to Table 5_PPHOA Audit checklist EA condition 15
	2. Pinnacle Point Home Owners Association		
112	i. Ensure that adequate funding is available to manage the responsibilities of the approved ACMP ii. Ensure that unrestricted access is granted to the archaeological and paleontological sites and geological features for scientists approved by HWC, SAHRA, SA Council for Geosciences, or some other professional scientific organisation iii. Ensure that there is controlled access to the sites by the public for the purpose of public education – conservation through	SE	i. The Financial Manager has verified the Pinnacle Point Home Owners Association's FY2026 Consolidated Budget in collaboration with the Auditor. PPHOA is confident that the funds allocated for environmental management in previous financial years, as well as those earmarked for upcoming years, are sufficient to ensure continued implementation and compliance with the Environmental Authorisation (EA) and

Nr	CONDITION	SCORE	VERIFICATION
	education. iv. To ensure that proper information signage are installed at all major sites and to update these signs as new information arises v. Ensure that all walkways and stairs leading to the sites are maintained at all times. vi. Ensure that proper security measures are in place to avoid any unnecessary access to the archaeological sites by unapproved visitors. vii. Ensure that all Home Owners abide by the conditions of the approved ACMP viii. Ensure that a qualified archaeologist is present whenever any excavation work is done on the Estate be it for a private dwelling or any other works ix. Create awareness amongst the Home Owners and visitors onto the Estate of the significance and sensitivity of the archaeological sites. x. To ensure that all the conditions as set out in the approved ACMP are met. xi. Ensure that no erosion takes place that might damage any artefacts of sensitive archaeological areas xii. Stabilization and conservation of site. PP7 & PP5-6		Environmental Management Programme (EMP) requirements. Proof of Email 6/10/2025. ii. Unrestricted access granted. Email from Dr Nilssen on 17/10/2025: Fully compliant iii. House rules 2024 section 7.15 <i>“Access to Heritage sites within estate, as well as PPHOA caves are prohibited”</i> Email from Dr Nilssen on 17/10/2025: compliant and managed by PoHO tourism initiative iv. Refer to the Point of Human Origins: Archaeological Tours, South Africa website photos of signs. Email from Dr Nilssen on 17/10/2025: agreed by scientists that signage at sites not appropriate and that signage and displays on St Blaize trail, at platform and in vicinity of the “mosaic tunnel”. Information is conveyed by PoHO guide trained by archaeologists v. Walkways and stairs are inspected and maintained regularly. Email from Dr Nilssen on 17/10/2025: vi. Public access to the sites is controlled at the main gates. Registers available. Email from Dr Nilssen on 17/10/2025: Fully compliant – implemented by PPHOA and PoHO vii. Refer to 9C ACMP plan conditions verification. Email from Dr Nilssen on 17/10/2025: compliant through existing PP Estate security system viii. Refer to section 5.8 “An independent monitor...” Email from Dr Nilssen on 17/10/2025: compliant to the best of my knowledge ix. On the PPHOA website Caves - Pinnacle Point Estate and Point of Human Origins: Archaeological Tours, South Africa website for information on these caves, cave visits as well as photos, signs and visitor reviews

Nr	CONDITION	SCORE	VERIFICATION
			of these tours. https://youtu.be/hjvKMgkP8FE. Email from Dr Nilssen on 17/10/2025: fully compliant through MAPCRM and Dr Nilssen x. Refer to 9C ACMP plan conditions verification . Email from Dr Nilssen on 17/10/2025: compliant to the best of my knowledge xi. Weekly and monthly evaluations undertaken by MAPCRM. They will bring any damage to the attention of the PPHOA. Email from Dr Nilssen on 17/10/2025: compliant to date xii. Stabilization has been undertaken and an audit report was conducted. Email from Dr Nilssen on 17/10/2025: plans underway for stabilisation and protection of PP 5-6N&S Previous audit (2018) finding: "The ECO is responsible to ensure implementation of the ACMP" <i>It was found that the ECO has no knowledge of or authority for implementation of the ACMP.</i> Correction action required: Review of the OEMP is required to address this issue or else the ECO should be given authority to check the implementation of the ACMP. It is recommended that the ACMP be included in the terms of reference for the next audit. - Compliant
	3. Mosselbay Archaeological Project or other suitable archaeological consultant.		
113	i. The archaeological sites will receive a regular (monthly) evaluation to check for site security, erosion and damage - This would take place at regular intervals through the year, and monthly is considered optimal. - It is the responsibility of the PPHOA to assure that the survey occurs and the PPHOA would cover the costs. - The examiner would conduct a walk-through of all the major sites and examine the sites for damage and signs of recent human	SE	- Refer to section 5.8 - Refer to section 5.8 "An independent monitor..." - Refer to section 5.8

Nr	CONDITION	SCORE	VERIFICATION
	activity. 4. The examiner would complete a form describing the state of the sites and take a few photographs of the sites. 5. The examiner would file a report with the PPHOA and HWC 6. This survey could be done in conjunction with the water monitoring. ii. All vegetation clearing and earthmoving activities will be monitored by an independent archaeologist 1. If the archaeologist identifies heritage being disturbed they would alert the PPHOA and a suitable Principal investigator for a site visit and evaluation. 2. Approved by HWC at the cost of the homeowner. iii. The water flowing into the archaeological sites will be monitored: 1. Weekly check buckets strategically placed at the drip points of major sites. 2. The monitoring would be conducted by an independent archaeologist approved by HWC 3. It will be the responsibility of the PPHOA to assure that the water monitoring occurred and the PPHOA would cover the costs. 4. There will be regular communication between the head grounds-keeper and the archaeologist monitoring the water flow, and if the water flow is determined by the archaeologist to be too high, the irrigation will be cut back. 5. The archaeologist will file reports with the PPHOA and HWC		
	4. Department of Environmental Affairs & Development Planning(DEA&DP) and Heritage Western Cape (HWC)		
114	DEA&DP and HWC will : i. Provide a budget for regular visits to monitor progress with respect to conservation and management measures and activities ii. Evaluate effectiveness of conservation and management	N/A	This condition is the responsibility of the DEA&DP and HWC and therefore not scored. It is confirmed by the EM that visits are being conducted.

Nr	CONDITION	SCORE	VERIFICATION
	strategies and to take action if they are not iii. Plan an overall review of the ACMP every three to five years		
	9J. Game Introduction and management plan 09/2012		
115	The management plan must be amended to align and address objectives of the GTUP (Game Translocation and Utilization Policy) The objectives are: • To ensure that risks posed to biodiversity by the introduction of extra-limital game species are effectively mitigated • To ensure sustainable utilization of natural resources • To ensure ecological integrity of species and • To ensure effective protection, security and compliance The approval of the game management plan does not exempt the landowner from permits. The approval of this management plan is further subject to the submission of a written undertaking by the landowner to implement this management plan and it is therefore requested that a signed written undertaking to implement this management plan, be submitted.	4	According to the conservation management plan 2018 section 3.3 <i>"no further game introductions will be taking place"</i> .
	4. Habitat management		
116	a. All roads should be regularly brush-cut/mowed to encourage grass cover development. b. Dams: Clear some thick cover to facilitate easy access for game to the water c. The infestation of Australian myrtle along the north-south gravel road leading to the sewerage works should be cleared as soon as possible. d. An offloading ramp will have to be constructed at the release site.	4	a. It was clear from the site visit that roads are brush cut/mowed. b. Game drink at water containers provided for the purpose – refer to photos below c. All Australian myrtle has been removed d. Not applicable as no new game will be introduced.

Nr	CONDITION	SCORE	VERIFICATION
			
5. Monitoring			
117	Establish an objective veld condition monitoring system: • Establish about 5 fixed-point photo sites and at least one fenced enclosure • Complete a survey record sheet for fixed point photo sites. • It is recommended that the manager appoints a suitably competent person to institute and carry out the monitoring plan.	4	Photos are taken, however not fixed point as stipulated, regularly of the areas used by the game. Refer to old feeding points and new feeding point photos below: Eight (8) Zebras are visually seen weekly. See photos below 

Nr	CONDITION	SCORE	VERIFICATION
			 Previous Audit (2018) finding: Establish an objective veld condition monitoring system: • Establish a number (about 5) fixed-point photo sites • Complete a survey record sheet for fixed point photo sites. • It is recommended that the manager appoints a suitably competent person to institute and carry out the monitoring plan. Correction action required: This monitoring system has not yet been implemented as it has not been incorporated into the OEMP. This monitoring plan needs to be addressed in the Conservation Areas Management Plan. – Monitoring is being conducted on the 8 Zebras -Compliant Previous Audit (2024) Recommendation: Review this condition and determine whether fixed point photos sites are still required. Update EMPR accordingly. - Monitoring is being conducted on the 8 Zebras - Compliant
	5.2 Game population monitoring		
118	1. Accurate records should be kept of game introduced, population numbers and mortalities. 2. The total numbers of all game species should be accurately censused at least annually.	4	1. According to the conservation management plan 2018 section 3.3 “no further game introductions will be taking place. Existing zebra, ostrich and springbuck are managed according to these guidelines”. Eight (8) Zebras left on the estate (Two new Zebras were born during 2025). 2. Annual census not applicable.

Nr	CONDITION	SCORE	VERIFICATION
			Previous Audit (2015) Finding: Section 5: Guidelines for games introduction and management. Monitoring: Establish an objective veld condition monitoring system: - Establish a number (about 5) fixed-point photo sites - Complete a survey record sheet for fixed point photo sites. - It is recommended that the manager appoints a suitably competent person to institute and carry out the monitoring plan. Finding: No monitoring system for grazing impact has been established. – Refer to previous condition - Compliant
	6. Supplementary feeding		
119	- Provision should be made for supplementary feeding (e.g. lucerne) - Provide feed in a manner that prevents waste and water-logging	4	- Additional feed are provided for game. Lucerne pellets, molasses blocks, molatek blocks. Invoices available. - Feeding areas are regularly moved to prevent degradation of feeding areas. Refer to previous condition for photos of old and new feeding sites.
	7. External Parasite and Disease Control		
120	- If at all possible, the animals should be left to develop a natural resistance to parasites of the area - Treatments should only be used if conditions become critical. - Animals introduced should be from sources already adapted to the parasites of the area. - Animals that are obviously sick or diseased should be culled and disposed of to eliminate a possible source of disease or parasite contamination for other animals.	4	- Animals are left to develop a natural resistance - If required animals are treated by appointed veterinarian - Animals introduced originated from Springerbaai 23km from Pinnacle Point. - PPHOA appointed Veterinarian Dr Willem Burger to assist with these game related needs.
	8. Maintaining Genetic Heterozygosity		
121	Because of the relatively small populations of game on the reserve, it will be necessary to supplement the genetic integrity of populations with additional unrelated animals of each species (1 or 2 individuals) every 5-7 years	4	According to the conservation management plan 2018 section 3.3 “no further game introductions will be taking place”.

Nr	CONDITION	SCORE	VERIFICATION
	9L Conservation management programme 12/2018		
	3.1 Property management		
122	The properties of which the conservation area is currently being made up are partially under ownership of the Pinnacle Point Homeowners' Association and partially under Municipal ownership. The Municipal land adjacent to Louis Fourie Road is no longer under management by Pinnacle Point, as a cemetery and a new road development have been approved on part of that land. It is uncertain what will happen when the lease agreement for erf Rem/15390 lapses, but as this portion was included in the development plan for the Environmental Authorisation, it will need to be managed for conservation, even if so by the Municipality. 1. The conservation worthy land consists of all land south of the prison property, running west up to the Pinnacle Point fence. It is recommended that Pinnacle Point (with the Municipality) apply to Cape Nature for declaration of all conservation worthy land under their Stewardship programme or investigate other ways to formalise the conservation status of the land. 2. Review boundary fencing and fire breaks to accommodate the changes in land use of the land next to Louis Fourie Road.	SE	Refer to Table 5_PPHOA Audit checklist EA condition 25
	3.2 Vegetation management		

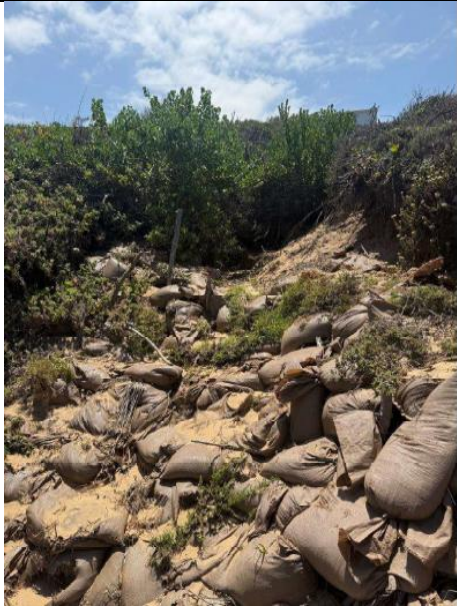
Nr	CONDITION	SCORE	VERIFICATION
123	Keeping inventories of plants, animals and birds found on the Estate has value in that it informs management of the conservation area and species present and their management need, and it raises awareness amongst residents and visitors. It is important to be aware of the presence of rare or endangered species to ensure their continued conservation 1. Appoint a botanist or botany students to undertake a survey of the Estate to compile an updated species inventory. 2. Provide a page or a link on the Pinnacle Point website where residents or visitors can log birds and mammals that is automatically inserted into a list. Undertake this as soon as possible and communicate the update to the website to the residents and golfers. 3. Undertake an annual audit of these lists by qualified specialists to ensure that the quality of the information is not compromised.	2	1. Inventories of plants, introduced game and bird list is available. Photos of wildlife also available. Whatsapp group available with all wildlife spotted on the estate. Appointment of a botanist to undertake survey will be considered complied with. See photos of recent wildlife on estate. 

Nr	CONDITION	SCORE	VERIFICATION
			 2. Birdlife checklist available on the website. https://pinnaclepointestate.co.za/wp-content/uploads/2017/05/SasolScichecklist.pdf. Active bird watching community at Pinnacle Point with regular bird watching outings and bird counting instances. The birdlife checklist is being updated. Birdlife checklist updated and verified by auditor 3. Annual birdlife audit of an estate bird expert will be considered and complied with. – updated bird life checklist available Previous Audit (2024) Recommendation: Make use of a botanist/botany student to verify plant list and appoint birdlife expert to verify bird list – botany appointment to still to be conducted Recommendation: Make use of a botanist/botany student to verify plant list
	3.2.2 Monitoring of rare or endangered species		
124	Currently the only known rare or endangered species present on the	4	Photo presented to auditor of the red data species on the

Nr	CONDITION	SCORE	VERIFICATION
	Estate are <i>Diosma aristata</i>, <i>Lampranthus diutinus</i> and <i>Drosanthemum lavisiae</i>. Until further species are discovered, monitoring will focus on these species 1. Do annual monitoring during spring when the plants are flowering, recording the following information. 2. Count the number of plants in the population. 3. Indicate the life stage (seedling, adult or moribund/dying) and reproductive stage (flowering, non-flowering, seeding) of each plant. 4. Measure the size of the plant (height and spread) 5. Measure the distance between plants or the spread of the plants 6. Take photographs of the population. 7. Note the person doing the monitoring and his/her qualifications and the date. 8. The monitoring data must be compared to previous year's data to identify trends and determine the health and viability of the population. The following comparisons need to be made: a. Number of plants (increasing or decreasing?) b. Spread of the population (increasing or decreasing) c. This information should be made available to botanists or Cape Nature, should they be interested in the plants.		estate. Photo shows no changes since the 2024 audit Previous Audit (2024) Recommendation: Capture the monitoring detail on the photo in a table for each year. Take into consideration the specific requirements.- Compliant
	3.2.3 Erosion & Stormwater management		
125	Land use practices prior to the establishing of the Estate have left erosion scars in the landscape. These scars have been treated by stabilising the soil with sand bags and other means. Targets: 1. To respond to all erosion problems as soon as they are identified by identifying the cause of erosion and treating the cause as well as the erosion to repair the damage. Deliverables: 1. Continual erosion management. 2. Healthy environment, with special attention to archaeological sites.	2	Comment received during public participation(10 June 2026) Complaint issued by landowner in 2022 to PPHOA regarding ongoing erosion between the 6th and 7th holes, alleged non-compliance with the Environmental Authorisation and potential risks to heritage resources and adjacent properties. Finding Final Environmental Audit Report (Revision 3_17/07/2026): Erosion partial compliance: Documentation received from Estate Manager on 22 June 2026 shows that temporary

Nr	CONDITION	SCORE	VERIFICATION
	Action: 1. Continually monitor the stabilized erosion sites for establishment of vegetation cover. Rehabilitate the site by planting seedlings or covering the area with seed bearing branches, should vegetation cover be slow to re-establish. 2. A problem with stormwater was identified by the archaeologists, causing undesirable impacts on a cave at the coast. An erosion problem associated with this stormwater flow exists off the St Blaze hiking trail. Identify the source of the stormwater problem and treat the problem appropriately to avoid further erosion and damage to the cave. Stabilise the erosion scar to allow revegetation.		(nature based) erosion control measures were implemented according to a proposal by the previous ECO Mr Manie Steenkamp in July 2023. This included removal of the two thinner plastic pipes and installation of sandbag cross-walls (± 2.0 m apart, ± 30 cm high) in the upper section, together with securing of the sides to control flow velocity. These measures provided short-term stabilisation of the upper section. Recognising the limitations of the temporary sandbag solution for long-term coastal dune erosion control, the Estate commissioned a detailed professional engineering assessment, <i>A Coastal Erosion Protection Design Report</i>, completed by ILIFA Africa Engineers (Report No. P25-137-01, dated 02 June 2026). The report recommends a robust, engineered solution consisting of gabion retaining walls along the gully edges and Reno mattresses along the base, supported by a geotextile filter layer. The Estate is consulting with a registered EAP to confirm applicable legal requirements for the proposed erosion rehabilitation. The Estate has demonstrated meaningful progress by moving from initial temporary stabilisation measures to a professionally engineered long-term solution however implementation and rehabilitation remain incomplete

Nr	CONDITION	SCORE	VERIFICATION
			Pinnacle Point Erosion  Legend Map Center: Lon: 22°45'3.6"E Lat: 34°12'21.9"S Scale: 1:4,514 Date created: 2026/16/07  Western Cape Government FOR YOU

Nr	CONDITION	SCORE	VERIFICATION
			 Photo above from Ilifa No: P25-137-01 Report 2 June 2026 Recommendation: • The Estate must implement appropriate measures to address the erosion and ensure that all activities are undertaken in compliance with applicable environmental legislation and authorisations • The Estate should maintain records of erosion management actions undertaken and implementation timelines for further rehabilitation measures. • Continue monitoring the site as stipulated by the Conservation Management Programme (2018)

Nr	CONDITION	SCORE	VERIFICATION
	3.2.4 Veld rejuvenation/fuel management		
126	Some areas of open/conservation space are too small to be burnt and are not included in the rotational burning plan for the Estate. The Integrated Fire Management Plan points to areas adjacent to FMUs 4,5,6,7,8,9 and 12. These areas being fynbos, however, also need rejuvenation to maintain a healthy ecosystem and fuel management for safety purposes. 1. Areas that are too narrow to be burnt safely between erven can be brush-cut to just above ground level on a rotation of 12-15 years. Cut material can be chipped and spread on the ground. 2. Compile a record for the cutting of vegetation to avoid too frequent cutting.	SE	These areas are brush-cut and a record is kept. Refer to 5.7 Fire Management
	3.3 Wildlife management		
127	Since such animals are of novelty value and not the focus of the Estate, it has been decided not to undertake further game introductions. Some animals, including zebra, ostrich and springbuck, were released on the Estate and need management in accordance to the guidelines provided in the "Guidelines for introduction and management of Game" report which was approved by CapeNature.	SE	Refer to section 5.12 Wildlife management
	3.3.1 Continuity of wildlife habitat		
128	Pinnacle Point Beach & Golf Resort is a coastal development with a responsibility to ensure and maintain corridor function and movement of wild animals. Such continuity is essential for maintenance of healthy wildlife populations. For security purposes areas have been fenced with gates inserted at specified intervals to allow for the movement of game. The coastal corridor of approximately 100m wide has remained unfenced and should remain such. Maintenance of the game gates is problematic and although frustrating, the PPHOA must ensure that these gates are functional. For this reason, a Site Procedure Manual for Security has been prepared, which stipulates that: 1. The on-duty Shift Manager shall ensure that the faunal gates, number one and two, on the perimeter fence are to be opened and	SE	Refer to section 5.12 Wildlife management

Nr	CONDITION	SCORE	VERIFICATION
	remain so between 06:00 and 18:00 seven days a week. 2. The Control Room Operator must monitor these faunal gates by means of camera system and motion detector sensors to ensure that no unauthorized entry is gained through these points. 3. The Control Room Operator must take snapshots of any game moving through the gates in order to determine the effectiveness of these features in the overall wild life management. 4. The on-duty Shift Manager shall report any issues regarding safety risks at these gates to the Security Manager at a timeous manner. 5. In the event that any security breaches are noted (unlawful trespassing or domestic animals) the PPHO reserves the right to temporarily (no longer than one week at a time) close these faunal gates at night. During this time the Control Room must monitor for indigenous faunal movement wanting to make use of these gates. 6. Daily records of indigenous faunal movement must be kept on record and make available for the Annual Compliance Audit. The Provincial office of the Department of Environmental Affairs & Development Planning (DEA&DP) should be notified of any permanent changes to the operations of these game gates.		
	3.3.2 Game population monitoring		
129	The monitoring of game populations to determine their viability, growth and health is important for managing the populations as well as the veld 1. Take photographs and keep record of the animals crossing the game gates. 2. Keep records of species of wildlife observed on the Estate and where they were found. 3. Keep records of the counts, photographs and condition of introduced wildlife. Keep record of each animal in the Wildlife Register for the Game Camp (Appendix 1 of this report) 4. Do annual game counts during early summer. Keep records of the numbers of game species and compare the records annually to	4	Refer to section 5.12 Wildlife management. Photos of wildlife available and presented to the auditor. The estate wildlife whatsapp group keep record and photos of all wildlife spotted. Eight(8) Zebras on the estate Previous Audit (2024) Recommendation: <i>Keep record of all species wildlife available on the estate. – Whatsapp group showing all wildlife on the estate- compliant</i>

Nr	CONDITION	SCORE	VERIFICATION
	identify changes in the population numbers. The Game Census Recording Sheet is found in Appendix 2 of this report. 5. Do drive through monitoring of the game populations or fly through with a drone once every 3 months to identify sick or injured animals that may require treatment. Security personnel should also report any sick or injured animals found during security checks.		
	3.3.3 Parasite management		
130	Naturally occurring game species are adapted to the pests from the area. Introduced species are, however, not adapted and are susceptible to parasites and their associated diseases. Treat antelope for ticks according to the guidelines provided in the specialist report.	SE	Refer to section 9J nr 7
	3.3.4 Supplementary feeding		
131	The fynbos vegetation is not adequate to provide good nutrition to large herbivores introduced to the Estate and supplement feeding is required 1. It has been recommended that the zebra receive lucerne and/or game pellets to supplement their diet, especially during dry periods. 2. Salt licks can also be supplied for both zebra and other animals.	SE	Refer to section 9J nr 6
	3.3.5 Pasture management		
132	The area of the Estate into which game was introduced is fairly small, with limited habitat variability. The introduced game species are grazers, while the fynbos vegetation is mostly shrubby. Open areas need to be maintained for grass development to provide adequate pasture for grazers. 1. Brush-cut all road verges in the conservation area regularly up to a width of 5 m to encourage grass cover development for grazing.	SE	Refer to section 9J nr 4
	3.3.6 Veld monitoring		
133	Zebras and other game species can congregate at areas with good grazing grass, water points or feeding areas, trampling and over utilising these areas. Monitor the condition of such areas to prevent damage to the vegetation and soil.	SE	Refer to 9J. Game Introduction and management plan 09/2012: 5. Monitoring 1. Photos of water and feeding points available. It was also visible during the site visit.

Nr	CONDITION	SCORE	VERIFICATION
	1. Identify areas that are frequented by game, such as water points, feeding points and others. Log these on a map or by gps coordinates. 2. Do annual fixed point photographs of these sites by planting a post from which photographs are taken in specific directions. 3. Annually during spring to identify changes in the grass cover and potential erosion problems. 4. Do annual aerial photographs by drone to look for new high use open areas. 5. Should over utilising lead to veld degradation in any areas, game should be encourage to move off to other areas. Consider moving water or feeding points or fence off these areas for a period of time to recover.		2. Refer to section 9J nr 5 3. Photos available 4. Aerial photos available 5. Water and feeding points are moved regularly to prevent erosion and degradation. Shown to the auditor during the site visit,
	3.3.7 Wildlife and human interaction		
134	Wild animals should be left undisturbed as far as possible, wherever they may roam on the Estate and are likely to come into contact with people. 1. Most animals will move away when people are encountered and are not a problem 2. Snakes are likely to come in contact with humans and should not be killed, as they provide a useful service by controlling vermin populations. Whenever snakes cause a problem, Estate security can be contacted to catch the snake and release it in the conservation area. 3. Adequate waste and rodent control will lessen the likelihood of snakes or other animals frequenting buildings. 4. People may not feed any wild animals to encourage interaction.	4	1. This condition is a statement and therefore not scored. 2. Refer to section 9M GMP section 2.2.4 Pest control. 11. <i>"Snakes will never be regarded as pests, since they are unlikely to reach problematic population sizes. Furthermore, they are likely to control moles and rodents that are a problem on the Estate"</i>. Problematic snakes will be caught and relocated on the Estate. See below. The EA is the contact. 3. House rules (2024) section 2.15 "all refuse shall be placed in black bag into wheelie bins on day of collection". 4. House rules(2024) section 8.6 <i>"No person shall disturb, harm, destroy any wild animal, reptile or bird"</i> & section 8.14 <i>"Fauna shall not be chased, trapped, or interfered with in any way"</i>

Nr	CONDITION	SCORE	VERIFICATION
			
	3.3.8 Annual game management audit		
135	The effectiveness of the wildlife management measures need to be measured. The Conservation Trust must ensure that an annual assessment/audit of overall game management is undertaken by a suitably informed expert.	SE	Refer to section 5.12 Wildlife management
	3.4 Invasive Management 3.4.1 Alien Invasive plant control		
136	Alien invasive plants have to a large degree been eradicated from the Estate. Occasional plants are found that have sprouted and grown after previous control efforts. Alien invasive plant control is therefore a continual process. Pinnacle Point Estate Conservation Management Plan.	SE	Refer to Table 5_ PPHOA Audit Checklist EA Conditions Extra Conditions nr 5 1. There is currently one (1) certified pest control officer on the estate. The EM is currently in the process to certify as

Nr	CONDITION	SCORE	VERIFICATION
	In addition to the alien invasive plants in listed under the NEMBA, kikuyu grass is not allowed to spread from the golf course (condition of the Environmental Authorisation). Kikuyu grass has been established in some, previously disturbed, areas of the Estate, in the conservation area as well as in out of play areas have been previously disturbed and overgrown with kikuyu grass prior to the development of the golf course and estate. These areas will most likely never be rehabilitated to be free of this grass. The grass should, however, be controlled where natural vegetation is found. 1. The South African Green Industries Council present invasive species identification and control courses. Send one or more employees of the Estate on such a course at the first opportunity available. 2. The species known from the Estate and their control methods are listed in Table 1. 3. As the estate has been cleared of most mature alien invasive plants, regular follow up is required as prescribed in Table 3. 4. Golf course management must check the golf course boundaries for invasive shrubs that establish from seed brought in by golfers' shoes. 5. Golfers must be forced to wipe all old soil deposits from their shoes with a brush provided at the clubhouse before entering the golf course to prevent or contain the spread of seeds from outside of the Estate.		a pest control officer. In house training is conducted to ensure the correct control methods. Below a photo of kikuyu control 2. Correct. This condition is a statement and therefore not scored 3. Continuous alien clearing is conducted by the golf management as well as the EM on the estate 4. Continuous alien clearing is conducted by the golf management 5. Brush for golfer shoes available at clubhouse.  Kikuyu control
3.4.2 Invasive animal control			
137	Invasive fauna are not usually as visible as the plants and the threat is therefore not as easily recognized. The exception on Pinnacle Point would be the establishment and increasing numbers of Guinea fowl that causes damage on the golf course. Relevant species and the methods of preventing their spread are addressed in Table 2. Invasive Fauna control methods	N/A	This condition is a statement and therefore not scored. Guinea-fowl and francolin are currently not experienced as a problem.

Nr	CONDITION	SCORE	VERIFICATION
	3.5 Fire management plan		
	3.5.1 Fire protection and response		
138	These ignitions probably pose the greatest threat to the Estate, and are most likely to occur on the northern, western and eastern (in order of probable likelihood) boundaries. The southern boundary appears to be the safest because the vegetation here is predominantly coastal thicket, which, if intact, does not really support the ignition and spread of wildfires. This, however, does not rule out the need for residents to be aware and careful with potential causes of wildfires 1. Wild fire management is described in great detail in chapter 3 of the <i>Integrated Fire Management Plan</i>. 2. Pinnacle Point Beach & Golf Resort is currently a member of the South Cape Fire Protection Agency (SCFPA). It is recommended they remain such in order to benefit from the Agency's support as well as training. 3. The Bolweki Integrated Fire Management Plan includes the portion of Municipal land adjacent to Louis Fourie Road that is planned for development by the Municipality. The affected blocks are 14, 15, 16 and these blocks should no longer be considered part of the Estate for conservation management. Once the cemetery and new road section that are planned in blocks 15 and 16 have been developed, the width and position of fire breaks on the boundary need to be reviewed, as these developments will represent new potential points of ignition.	SE	1. Refer to section 5.7 Fire management 2. Refer to section 5.7 Fire management 3. Refer to section 9B 2.4
	3.5.2 Fireproofing properties		
139	The layout of the Estate residential properties have been done in such a manner that narrow "fingers" of natural vegetation exist between rows of properties. Many of these fingers are so narrow that they are impractical and unsafe to burn with the larger vegetation units. These areas need to be managed for fuel load or fire risk, as wild fires could spread into these fingers and create a risk for properties.	4	1. These "fingers" are brush cut when required 2. This condition is a statement and therefore not scored 3. Aged and dying proteas are removed. 4. Dead vegetation is removed from these fingers continuously. They are self-sustainable and are not irrigated

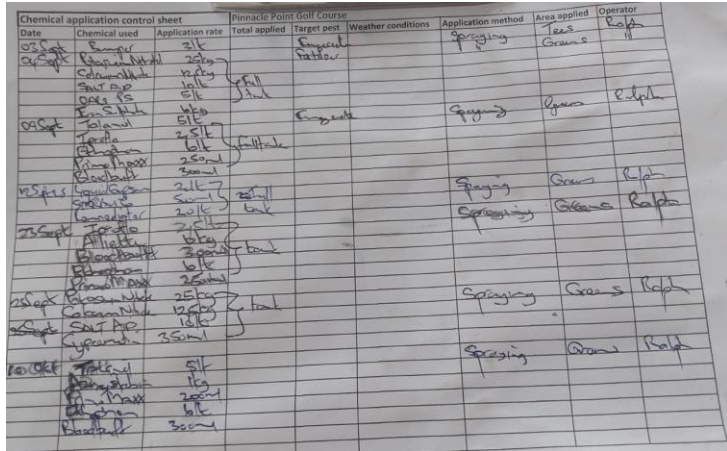
Nr	CONDITION	SCORE	VERIFICATION
	1. Check the entire Estate to identify “fingers” of natural vegetation that are too narrow for safe burning. Identify the vegetation type present. The Integrated Fire Management Plan points to areas adjacent to FMUs 4,5,6,7,8,9 and 12. 2. Short limestone fynbos does not need action. 3. Sandy patches with tall shrubs should be actively landscaped with thicket species that are fire resistant. Remove aged or dying proteas, <i>Chrysanthemoides</i> or other shrubs that could easily ignite. 4. It is important that these thicket patches between the houses be irrigated continually, especially during dry periods. Dry thicket is as flammable as fynbos and provides fuel ladders to reach high up structures.		
	3.5.3 Ecological Fire Management		
140	The maintenance of a fire regime that mimics as closely as possible the natural regime that shaped the evolution of the biota of the Estate is critically important. This is the motivation behind the condition of the Environmental Authorisation (EA) that a fire management plan be developed for and implemented on the Estate. Refer to Integrated fire management plan requirements.	N/A	This condition is a statement and therefore not scored.
	3.6 Golf course impact management		
141	The golf course was approved on the premise that the impacts associated with the development thereof should be contained in order to maintain the natural vegetation on the property. Fynbos is sensitive to water and nutrient changes in the soil, especially phosphorous. The golf course is irrigated with treated effluent, which is phosphorous rich. In addition, high levels of boron have been found in some water samples, also attributed to the treated effluent. In order to manage the impacts on the fynbos, a soil monitoring programme was required and developed in the Pinnacle Point EMPR. This monitoring was undertaken, but a few shortcomings were experienced. Estate management therefor identified the need to compile a Golf course management plan (GMP) to address	4	Golf course management plan has been compiled and implemented.

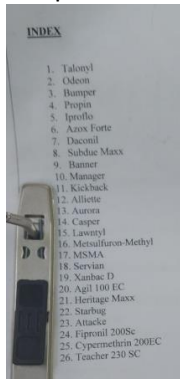
Nr	CONDITION	SCORE	VERIFICATION
	golf course impact on the out of play area. A golf course management plan was compiled by an environmental specialist in 2019.		
	3.7 Recreation management		
142	For construction of new paths and rehabilitation of existing paths, follow the landscaping guidelines and "Ongoing Construction on the Estate" requirements in the EMPR.	SE	This condition is a statement and therefore not scored.
	9M Golf Course Management Plan 02/2019		<i>Previous Audit (2018) Recommendation: It is recommended that a specific EMP, as a subsection of the EMPR, be developed to address golf course management issues. This is to enable effective implementation by the golf course management. – Compliant</i>
	1.4.1 Conditions of approval		
143	The mitigation /rehabilitation measures and recommendations as detailed in the Environmental Impact Report dated July 2003 compiled by Mr C.M. Gaither of CODEV, must be adopted and implemented. These recommendations and (their method of implementation in brackets) are: 1. Water quality monitoring programme (irrigation water quality monitoring). 2. Installation of sub-surface drains in high risk areas, draining into strategically sited detention ponds/ wetlands. (Properly maintain sub-surface drains and associated infrastructure). 3. Soil chemistry and salt balance study to ensure minimum quantity of fertilizer is used (adapt fertilizing according to soil and grass sample results and water quality results). 4. Design groundwater monitoring network to monitor ground water rise and build-up of salt in soils and levels of pesticides. (Soil sample monitoring).	SE	1. Irrigation water lab tests done. Refer to Table 9: Compliance evaluation of the DWA General Authorisation section 9K nr 2 2. Drain points on golf course drain into stormwater system. 3. Soil lab tests are done to indicate nutrient shortages before fertilizer applications. Refer to section 9M GMP section 2.2.3 Fertilising: "Fertilisers will be applied according to needs based on soil, irrigation water and plant analyses". This was confirmed. 4. Soil lab tests are done. Refer to section 5.10.1
	1.8 Document control and record keeping		
144	The following documentation control procedures with respect to the GMP must be fulfilled: 1. A copy of this management programme must be available to each manager. A master copy must be available at the Estate office at all	4	A copy of the GMP is available at the PPHOA offices. The Golf Course Superintendent confirmed this.

Nr	CONDITION	SCORE	VERIFICATION
	times. 2. Each department/line function must maintain copies of the operating procedures that are specifically applicable to its activities. These can be extracted from the GMP and placed in a separate Operating Procedures Manual for that specific section/department, for ease of reference. 3. Each departmental/section manager is responsible for ensuring that the latest version of the operating procedure is kept on file and implemented. To this end, operating procedures revisions should be numbered and dated (e.g. Revision 1.0, 11 February 2000). 4. The Estate Manager must maintain a full schedule/data base of the operating procedures, in which the operating procedure, the revision number and the date is listed. This information can be stored electronically and either an electronic or hard copy back-up must be maintained.		
	1.9 Roles and Responsibilities		
145	Amongst others the following responsibilities lie with Golf Operations: 1. Ongoing monthly training to golf personnel to ensure the correct application of poison, pesticides, herbicides and fertilisers; 2. Testing for and reporting on soil chemistry and salt balance to ensure optimal quantity of fertiliser is used; 3. Golf course drainage and maintenance with associated repairs to reinstate disturbed areas and protect the surrounding natural areas from erosion; 4. Quality control for irrigation water (treated effluent); 5. Verify wind speed and direction to prevent overspray of treated effluent onto neighbouring natural areas surrounding the golf course; 6. Maintain photographic record of natural areas at each course hole as an additional measure to monitor irrigation edge-effect on natural areas surrounding the golf course; and 7. Management of turf to ensure that it does not encroach into	4	Yes these responsibilities fall under the Golf Operations.

Nr	CONDITION	SCORE	VERIFICATION
	remaining natural areas surrounding the golf course.		
	2.1 Golf course edge management		
146	This edge between the golf course and the conservation area needs to be kept as narrow as practically possible. Creeping of this edge into the conservation areas must be prevented. 1. Maintain the boundary pegs on the golf course; 2. Prevent overspraying into the fynbos by setting the sprayers correctly, checking for leaks and faulty spray heads or spray direction daily and not spraying when wind causes substantial wind drift.(refer to the Irrigation specifications) 3. Prevent granular fertilisers from landing in fynbos (refer to the fertilizing specifications) 4. Prevent the spread of weeds and golf course grasses in to the fynbos. (refer to the weed and kikuyu control specifications). 5. Monitor the width of this edge through annual fixed point photographs during spring. Mark points next to sensitive fynbos areas, especially limestone fynbos, adjacent to the golf course (i.e. not previously disturbed areas). Mark the boundary between the visible edge and the unaffected fynbos with a peg. Take photographs in the same direction every time, past the peg. Compare the width of the visible edge with that from previous years, as well as the condition and health of the fynbos. Note any observed changes and discuss these with the PPHOA landscape manager to determine action required. 6. Fynbos that grows over the edge of the golf course is cut back to a maximum of 30 cm length. 7. Beyond the golf course edge pruning of vegetation is only allowed where and to the extent pre-arranged with the PPHOA landscape manager. 8. No milkwood (<i>Sideroxylon inerme</i>) branches may be cut. Pruning of milkwood trees need to be arranged by the landscape manager.	4	1. The golf course edge is marked with a visual furrow and no other practises take place outside this boundary. Boundary trench in place. 2. Sprayers are set and serviced at regular intervals. 3. Only shortly mowed in play areas are fertilized. 4. Manual weeding and selective chemical applications done regularly when needed. Kikuyu is eradicated continuously. 5. The golf course edge is marked with a fixed 40cm wide trench. No other practises take place outside this boundary. Photos are taken when areas show signs damage from irrigation. Follow up photos are captured after rehabilitation. No such incidences reported Previous Audit (2024) Recommendation: Revisit this requirement to ensure full compliance or update the GMP to reflect the current practice - Compliant 6. This is done accordingly 7. This is done accordingly 8. Milkwood pruning is not allowed 9. No one except the trained golf pickers is allowed in the out of play fynbos area.

Nr	CONDITION	SCORE	VERIFICATION
	9. Only conservation management staff may enter the out-of-play area or retrieve golf balls from beyond the marked edge of the golf course		
	2.2 Turfgrass Maintenance		
	2.2.1 Turfgrass Replacement and Reseeding		
147	1. Adequate grass patches of <i>Agrostis palustris</i> will be maintained in the nursery for replacement on the golf course. 2. For greens and surrounds that need replacement, grass will be sodded or plugged from the nursery either with a sodding machine, hole cutter or a hexagon plugger. 3. Grass spots on the tees, fairways and roughs will be replaced with grass from the warm-up area or from sods of the nursery. 4. Imported sods will be washed before it is planted on the Golf Course, to prevent contamination of the soil with a different layer. This will cause layering that result in bad water penetration. 5. Reseeding on the golf course is done by a machine that plants the seed rather than spreading it to improve seedling recruitment and prevent seeds from entering the fynbos	4	1. Seeding is more cost effective and requires less water. 2. This is done accordingly 3. This is done accordingly 4. Pinnacle Point does not import sods 5. This is done accordingly. Spike seeder used.
	2.2.2 Mowing		
148	1. Greens, fairways and tees will be mowed in different directions to ensure striping for better quality grass. 2. Aprons/Collar must be kept at 5-8mm three times a week. 3. Very low mowing leads to a lot less food production since all the plants' food is manufactured by chlorophyll containing cells in the leaf blade. If more than one third of the leaf blade is being removed in a single operation, either the cutting height or the mowing frequency will be increased. 4. Mower blades must be kept sharp as blunt blades inflict larger wounds and provide more opportunity for pathogens to gain entry. 5. Mow the driving range last, after mowing the course. Wash the machines after mowing the driving range. 6.	4	Requirements 1-5 are done accordingly

Nr	CONDITION	SCORE	VERIFICATION
2.2.3 Fertilising			
149	1. Fertilisers will be applied according to needs based on soil, irrigation water and plant analyses. Probes are used to measure soil temperature, salinity, electrical conductivity and moisture. 2. Soil and leaf analysis are done at the end of summer and end of winter (six monthly) on the greens, fairways and tees to determine the Nitrogen (N), Phosphate (P) and Potassium (K) contents. The fertilising programme is adapted according to the results from the soil and leaf analysis. 3. No fertiliser will be applied during heavy rainfall periods. 4. Soluble fertiliser application with irrigation water is preferred, as the nutrients being provided can be better controlled than with granular fertiliser. 5. Granular fertilisers that are generally high in nitrogen are only applied before tournaments to boost the grass condition. 6. A granular fertiliser application will immediately be followed by irrigation for at least 10 minutes per area. 7. Fertilising through irrigation or distribution of granular fertilisers up to the marked boundary of the golf course both span this boundary, contributing to the golf course edge. Care must be taken not to impact beyond the edge between the markers and the fynbos. 8. Keep record of fertilisers used, the date, quantity applied and area treated.	4	1. Laboratory analysis is used. 2. Soil analysis is conducted. Refer to section 5.10.1 3. No fertiliser is applied during heavy rainfall. 4. Foliar fertiliser applications are done with only one annual granular application. 5. Done annually 6. This is done accordingly 7. Fertilizing through irrigation is not done. Granular applications are done only on in play areas 8. Record keeping in place, see chemical application control sheet below. 
2.2.4 Pest Control			
150	1. Pinnacle Point will implement Integrated Pest Management to prevent pests from becoming a problem where possible. Curative spraying of pests will be implemented, and not preventative spraying. A policy of minimal use of chemicals that are extremely harmful will, therefore, be adhered to.	4	1. This is done. Various other curative practices are in place to assist with plant health, soil health and to limit pest damage. 2. Visual inspections are conducted daily. 3. No highly persistent pesticides are used.

Nr	CONDITION	SCORE	VERIFICATION
	2. Each section of the golf course will be visually inspected daily to detect change in the uniformity, colour, and/or density of the turf. Initial recognition of an impending problem typically is based on grass symptoms, such as a decline in shoot growth, loss of green colour and decreased density. 3. No highly persistent pesticides will be purchased or used on the Estate. 4. A full inventory of the pesticides in store must be maintained. The storage and handling procedures specified by the manufacturer or on the Material Data Safety Sheet must be followed. 5. Keep record of pesticides applied, the date, and quantity applied as well as the area a pest treated. 6. The staff involved will be trained at all levels in pest identification, options for control, appropriate timing, dosages and application methods for pesticides. 7. Affected areas will only be treated through spot treatments rather than general spraying to limit pesticide application. 8. Pesticide application should be avoided on windy days and before heavy rains. 9. Pesticides will at all times be stored in the chemicals store. Only management staff is allowed to unlock and enter the store. Empty containers will be perforated and stored securely until disposal in a responsible manner. 10. A database of past problems should be maintained, containing dates, weather conditions, location, and nature of problem, solution employed and success rate of treatment. 11. Snakes will never be regarded as pests, since they are unlikely to reach problematic population sizes. Furthermore, they are likely to control moles and rodents that are a problem on the Estate. Problematic snakes will be caught and relocated on the Estate. 12. Guinea-fowl and francolin are discouraged from using the golf course		4. Pesticide inventory index below. MSDS's for each pesticide in the file.  5. Yes, see previous condition 6. There is currently one (1) certified pest control officer at the Golf course operations (Registration P42330) The EM has completed pest control officer qualification and in the process of being registered. 7. Yes. Only spot treatments are conducted 8. No spraying on windy days 9. Pesticides stored in the dedicated chemical store. 10. No problems reported in the last year 11. Refer to section 9L 3.3.7 12. Guinea-fowl and francolin is not deemed as a problem 13. No problems reported 14. This condition is a statement and therefore not scored. This process will be followed when applicable.

Nr	CONDITION	SCORE	VERIFICATION
	by the greenkeeper's dog. This method is effective, non-destructive and will be continued. 13. The rats are currently caught and relocated on the Estate. The species should be identified through capture of one animal which is to be sent to a specialist for identification. Suitable control measures can be devised from the species known habits and biology. 14. When a pest cannot be identified, specialists will be consulted for identification and recommendation of treatments, rather than experimenting with pesticides.		
	2.2.5 Weed Control		
151	1. The use of chemicals for weed control will be limited as far as possible. Herbicides that prolong in the soil (e.g. pre-emergence herbicides) and may cause detrimental effects on the environment will not be used. 2. Herbicides specific for kikuyu control will be used on this grass. 3. Harmful herbicides, e.g. Garlon, may not be used in or near low-lying areas or drainage courses. 4. Labour intensive hand weeding will be implemented as an environmental precaution, as well as a social benefit to the local community. 5. The Greenkeeper will monitor the turf daily through visual inspection to determine the need for weeding. 6. Greens: Weeding staff will ensure no weeds. Regular (3 times a week) edging on aprons will ensure no weeds and better definition. 7. Tees and bunkers: Weeding will be done weekly. 8. Remaining areas: Weeding per chemical spraying or hand weeding when weeds become problematic. 9. Continual evaluation of methods will be done. 10. A full inventory of the herbicides must be maintained. 11. The storage and handling procedures specified by the manufacturer or on the Material Data Safety Sheet must be followed.	4	1. This condition is a statement and therefore not scored. PPHOA take note of this condition. However only selective herbicides are used.  AGIL® 100 EC Reg. no. L4694 Act/Wet 36 d/1 van 1947 N-AR 0786 An emulsifiable concentrate herbicide for the selective post-emergence control of annual grasses in crops as indicated. 'n Emulgeerbare konsentraat onkruidsdoder vir selektiewe naopkomsbeheer van eenjarige grasse in gewasse soos aangedui. 2. Yes, the above is used for the eradication of kikuyu 3. Correct. This is done accordingly 4. Hand weeding are used when required 5. Daily visual inspections are conducted 6. Correct. This is done accordingly 7. Correct. This is done accordingly 8. Chemical spraying is only used to treat Kikuyu 9. Correct. Continual evaluation of methods is considered. 10. Yes, see previous condition verification. Inventory available 11. Yes, see previous condition verification. MSDS's for each herbicide are stored with their chemical. 12. Staff is trained by the certified pest control officer. Due to

Nr	CONDITION	SCORE	VERIFICATION
	12. The staff involved will be trained at all levels in weed identification, options for control, appropriate timing, dosages and application methods for herbicides. 13. Herbicide application should be avoided on windy days and before heavy rains. 14. Herbicides will at all times be stored in the chemicals store. Only management staff is allowed to unlock and enter the store. 15. A database of past problems should be maintained, containing dates, weather conditions, location, and nature of problem, solution employed and success rate of treatment. 16. Supply brushes at the golf clubhouse doors for golfers to clean their shoes before entering the club house or going onto the course to reduce the risk of weed seeds being spread. 17. The area around the driving range is cleared of invasive grasses and shrubs biannually.		time constraints proof of training could not be verified. 13. No spraying on windy days and before heavy rains 14. Chemicals are stored in the chemical stored and locked by the greenkeeper. 15. Database of past problems reported 16. Brushes available at clubhouse 17. Driving range area cleared continuously
	2.3 Bunkers		
152	1. Sand for the bunkers will only be obtained from legitimate, weed free sources where there is no detrimental environmental impact. Double washed maintenance sand is currently obtained from the Transand quarry. 2. Sand bunkers will be raked daily to an even depth of 100mm. 3. Monthly checks on the levels of the sand will be done to secure consistency in the bunkers. 4. The bunkers will not be fertilised. 5. Edging and weeding of bunkers will be done on a weekly basis. 6. Bunkers will be kept free of debris. 7. Due to the nature of bunkers, maintenance will be done and drainage will be checked on an ongoing basis to ensure playability. 8. Underground drainage pipes will drain the fairway bunkers continuously. 9. The underground sump at the 9th hole needs to be emptied regularly	4	1. Sand is bought from Transand quarry. Invoices available on request 2. Requirements 2-8 are conducted accordingly 3. No underground sump at the 9th hole

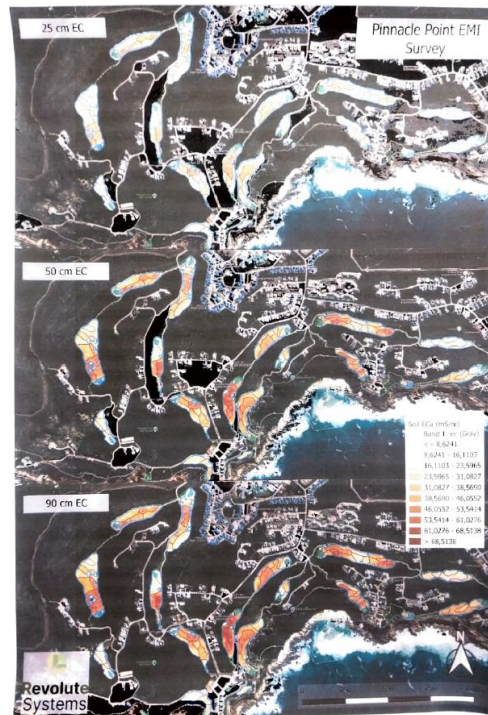
Nr	CONDITION	SCORE	VERIFICATION
	into the stormwater system. Check the pump and the water levels monthly to ensure that the system is functioning properly.		
	2.4 Cart Path Maintenance		
153	1. Clean and maintain the paths weekly, as needed. 2. Check the path system annually for signs of impacts on the adjacent vegetation (e.g. parking off the path) and short cuts. 3. Discipline maintenance workers driving off these paths, creating short cuts.	4	Paths are cleaned continuously.
	2.5 Maintenance area		
154	1. All the lawn mowers, tractors, etc. will be parked in the fenced maintenance yard, when it is not used. 2. Washing of vehicles and equipment may only occur in the maintenance yard. 3. All irrigation supplies will be stored in the maintenance area. 4. Hazardous materials include, but are not confined to: a. Fuels (petrol, diesel, oils) b. Chemical cleaning materials c. Herbicides & Fertilisers d. Paints e. Gas products 5. A hazardous materials store exists to the specifications and operational requirements of the Occupational Health and Safety Act. Lists and logs of hazardous materials must be kept current. All safety and fire specifications for these facilities per legal requirements must be enforced. A responsible person shall be nominated and registered to control and inspect on these issues. 6. All incidents (e.g. spills, fires, injuries) involving hazardous materials must be recorded. 7. Diesel is stored in a 1500 litre overhead tank provided with a concrete bund. 8. Petrol is stored inside the store in smaller quantities (220 litres).	4	1. During site visit the lawn mowers and tractors were parked inside fenced area 2. No washing activity was evident during the site visit. Only washed in wash bay. 3. Stored in irrigation storeroom 4. All hazardous material stored in dedicated chemical stores. 5. Chemical store regulations are followed as specified by Act 36 of 1947. Registered PCO, K Suhr, registration number P42330 6. Correct. This is done accordingly 7. Diesel stored in fuel room. Maximum 300liter 8. Correct. This is done accordingly 9. Used oils are collected by Oilkol 10. No spill kit on site, golf course superintendent will order a spill kit. 11. Correct. This is done accordingly 12. Correct. This is done accordingly 13. Only hand wash facility. Container for potable water on the spray rig 14. Correct. This is done accordingly 15. Containers are perforated before discarding.

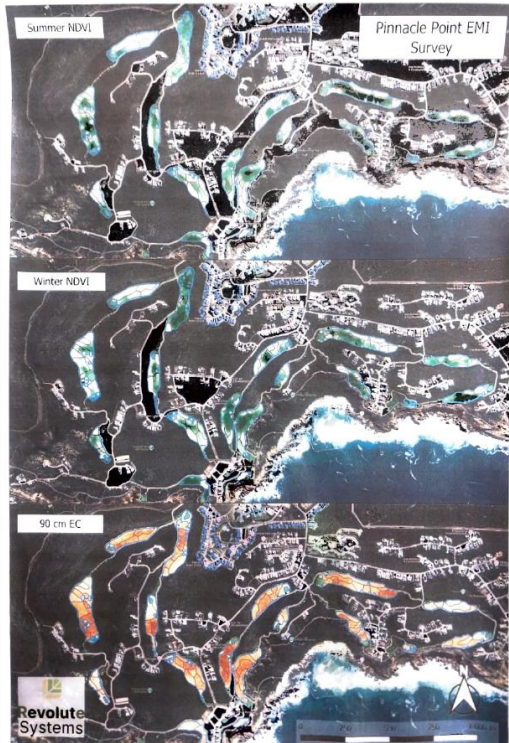
Nr	CONDITION	SCORE	VERIFICATION
	9. Used or contaminated hydrocarbon oils are discarded in small quantities. Currently these used oils are all taken by workers to paint their shacks. Tripple rinsed empty chemical containers may be used for these oils. 10. Absorptive sawdust and a spill kit (e.g. Spill Tech) will be readily available at the maintenance area to soak up spills and leaks of oil, petrol, diesel or chemicals. 11. Pesticides are stored in a cool, dry and airy room, which is fireproof and can be securely locked in this area. A weatherproof warning sign will be hung on the door. 12. Herbicides are to be stored apart from pesticides. 13. A shower and hand wash facility must be provided next to the chemical storage room. 14. Supplies of detergent, hand soap and water will always be available in this area. 15. A special disposal area has been established for surplus chemicals and containers being held for disposal. These chemicals and/or containers will be dumped at a waste dumpsite with suitable classification. 16. Containers will be checked regularly for corrosion, leaks and loose caps. 17. All safety and fire specifications for these facilities per legal requirements must be enforced. 18. The maintenance yard has a stormwater/ wash water drain that empties into the sewer pump station situated just outside the yard. 19. Check the pump station weekly to ensure that the pump is working and no leaks or spillage occur.		16. Correct. This is done accordingly 17. Correct. This is done accordingly 18. Drain relying on natural flow. 19. Correct. This is done accordingly
	2.5.1 Waste Management		
155	1. All solid waste from offices, the club house and golf course litter will be disposed through the Estate's waste disposal. 2. A preventive approach to litter disposal will be followed through	4	1. This responsibility falls under PPHOA EM.

Nr	CONDITION	SCORE	VERIFICATION																																
	appropriate placement of adequate sized litter cans and baskets around the golf course. These baskets will be aesthetically suitable and will be wind- and bird proof. Litter containers will be emptied daily so that they never overflow or attract animals. The Golf Course Supervisor will see to this responsibility. 3. Grass clippings from the golf course are stored in a skip at the maintenance yard that is removed to a local dump site when full. No clippings may be disposed in the out of play areas. 4. Material from pruning of shrubs is chipped with those of Estate landscaping at the maintenance yard and stored for use in landscaping. 5. Used oil is re-used by workers to paint their shacks. Excess oil will be stored in containers to be removed by Oilcol. 6. Chemical (pesticide and herbicide) containers must be rinsed 3 times and punctured before storage for disposal. These containers need to be disposed at an appropriate landfill site and may not be re-used for water or any other consumable products. Tripple rinsed containers may be used for storing used oils. 7. Rinse water from the chemical containers may not be disposed of in the environment. This water should be flushed through the sewer system. 8. A record of all waste that is disposed of by the contracted waste company must be maintained.		<table border="1"> <thead> <tr> <th>Pinnacle Point Waste Streams</th><th>% of waste generated</th><th>Disposal</th><th>Frequency of collection</th></tr> </thead> <tbody> <tr> <td>Domestic waste (Wet waste)</td><td>70%</td><td>4x GreenJobs - Invisible Waste Bins. Disposal to PetroSA general waste landfill site (G:M:B-)</td><td>Daily</td></tr> <tr> <td>Recyclables (Office paper, plastic, packaging, glas etc)</td><td>6%</td><td>Henqua waste</td><td>2x week</td></tr> <tr> <td>Garden waste (Garden refuse) - mulching are done at Pinnacle Point</td><td>10%</td><td>Louis Fourie Class B (G:C:B-) organic waste site</td><td>Daily from estate Every Friday</td></tr> <tr> <td>Golf course waste (grass clippings, pruning)</td><td>10%</td><td>Louis Fourie Class B (G:C:B-) organic waste site</td><td>Daily in estate Every Friday</td></tr> <tr> <td>Construction waste - for maintenance work. Each contractor is responsible for the construction waste</td><td>3%</td><td>Groot Brak solid waste facility</td><td>1x skip removed 2x month</td></tr> <tr> <td>Hazardous waste (Used oils, lubricants, petrol, diesel, paint, maintenance products, herbicides, pesticides, batteries, solvents)</td><td>1%</td><td>Oiltech</td><td>When required</td></tr> <tr> <td>Fluorescent bulbs</td><td><1%</td><td>Municipality</td><td>When required</td></tr> </tbody> </table> Invoices of all the above waste available at the PPHOA office 2. Emptied every morning 3. Correct. This is done accordingly 4. Responsibility of PPHOA EM 5. Removed by Oilkol 6. Correct. This is done accordingly 7. Correct. This is done accordingly 8. Responsibility of PPHOA EM	Pinnacle Point Waste Streams	% of waste generated	Disposal	Frequency of collection	Domestic waste (Wet waste)	70%	4x GreenJobs - Invisible Waste Bins. Disposal to PetroSA general waste landfill site (G:M:B-)	Daily	Recyclables (Office paper, plastic, packaging, glas etc)	6%	Henqua waste	2x week	Garden waste (Garden refuse) - mulching are done at Pinnacle Point	10%	Louis Fourie Class B (G:C:B-) organic waste site	Daily from estate Every Friday	Golf course waste (grass clippings, pruning)	10%	Louis Fourie Class B (G:C:B-) organic waste site	Daily in estate Every Friday	Construction waste - for maintenance work. Each contractor is responsible for the construction waste	3%	Groot Brak solid waste facility	1x skip removed 2x month	Hazardous waste (Used oils, lubricants, petrol, diesel, paint, maintenance products, herbicides, pesticides, batteries, solvents)	1%	Oiltech	When required	Fluorescent bulbs	<1%	Municipality	When required
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	2.6 Irrigation and Water Management																																		
156	Applications and systems will be managed according to the following guidelines: 1. The irrigation needs will be determined through weather conditions and soil moisture content monitoring. 2. The quality of waste water stored in the dam may not exceed the levels listed in Table 1. Do not irrigate with water of poor quality. 3. The greens, fairways and tees (in-play areas) will be irrigated	4	1. This is current practice 2. In place. Aerator installed on irrigation dam. Refer to Table 9: Compliance evaluation of the DWA General Authorisation section 9K 3. This is current practice 4. This is current practice 5. This is current practice. New system due for installation																																

Nr	CONDITION	SCORE	VERIFICATION
	optimally to ensure a high quality grass cover. The extremely close cutting height used on greens causes a substantial reduction in the depth and extent of the root system. The resulting limited water absorption capability necessitates an increased irrigation frequency. Light daily irrigation of greens or hand irrigation of specific areas may be necessary, particularly during midsummer. 4. Water application should be uniform over the green and collar to avoid wet or dry spots. Hand watering of localized dry spots is sometimes necessary, particularly on high spots and along the edges of greens. 5. Sprayers are set to overspray the golf course edge by 1 m to accommodate wind blowing water away from the edge. This ensures even coverage. 6. A record of daily water consumption must be kept to determine the amount of water needed for the golf course irrigation during different seasons. 7. Irrigation will be applied in the early morning or late afternoon/evening to reduce evaporation and wind drift, unless additional irrigation is required during the day to prevent heat stress of grass or dilution of fertiliser. 8. Irrigation for at least 10 minutes per area must immediately follow the application of granular fertiliser. 9. It is important that no leaks occur in irrigation pipes and sprayers to avoid water wastage, pooling or overland flow of treated sewage. Leaks in irrigation pipes must be repaired as soon as detected to prevent water wastage. Daily inspections of irrigation equipment (e.g. pipes, sprinklers) must be undertaken and if leaks are detected these must be repaired immediately. 10. Check the spray direction and distance of spray heads daily to prevent spraying into the fynbos. 11. There must be an adequate supply of spares required for		May 2026 6. This is current practice 7. This is current practice 8. This is current practice 9. Leaks are fixed as soon as they are id 10. Daily checks and adjustments are done 11. Fully equipped storeroom at the workshop 12. This is current practice 13. Aerator and Biofilter installed at the irrigation dam 14. Use of wastewater for irrigation is included in the golf newsletters. In the process to investigate signs Previous Audit (2024) Recommendation: Revisit this recommendation to ensure full compliance. – Compliant 15. Correct. This is done accordingly

Nr	CONDITION	SCORE	VERIFICATION
	maintenance purposes and an annual stock taking of spares must be completed at least 2 months prior to scheduled yearly maintenance. 12. All sub-surface drains and associated infrastructure must be checked weekly and maintained in a proper functioning condition. 13. Investigate the possibility of installing water treatment infrastructure that will reduce the salt content of the treated effluent. 14. Provide warning signs on the golf course warning visitors of the use of treated effluent for irrigation. 15. Stop irrigating the driving range when water shortages are foreseen.		
	2.6.1 Monitoring Protocol 2.6.1.1 Irrigation water monitoring		

Nr	CONDITION	SCORE	VERIFICATION
157	1. Monitor the EC of the treated effluent daily. Keep record of the readings and feed back to the Municipality when problems are found with water quality, especially EC readings. 2. When EC is found to be above 70 mS/m above intake to a maximum of 150 mS/m, water samples are to be taken and analysed in a laboratory. 3. Irrigation water from treated sewerage must be monitored monthly at the storage dam outlet to ensure that the water standards meet the legal requirements for irrigation. Take water samples taken from the treated effluent outlet into the dam and have it analysed at a laboratory. The target water quality range for irrigation water is stipulated in Table 1. Water should also be tested for organic carbon contaminants (or pesticides). 4. Keep records of all monitoring data.	4	1. No daily EC records are taken however samples are taken and analysed when required. The use of EC (Electrical Conductivity) measurements with the revolute system at Pinnacle Point Golf Course is currently under investigation as part of environmental monitoring and planning for future irrigation practices. 

Nr	CONDITION	SCORE	VERIFICATION
			 Previous Audit (2024) Recommendation: Investigate using a handheld EC meter or way to take daily EC measurements of the treated effluent from the municipality – Compliant - According to the analysis presented to the auditor the EC results were indicated as compliant. - Refer to Table 9: Compliance evaluation of the DWA General Authorisation section 9K nr 4 Records available of analysis conducted.
	2.6.1.2 Soil monitoring		

Nr	CONDITION	SCORE	VERIFICATION
158	1. Take monthly readings of soil salinity and EC on all 18 greens and the practice greens. 2. Take monthly readings of soil salinity and EC on all 18 fairways and the driving range. Take the readings midway between the tee and green, on the lowest part of the fairway where it is sloped. Take the geographical coordinates of the monitoring point for reference purposes. 3. Take annual soil samples for analyses of the fairways in the same location where the monthly readings are taken. Take these samples during summer (January/February). Have the samples analysed for specifically salts and boron. 4. Take remedial action when raised salinity, and/or EC, and/or boron values are measured. 5. Keep records of all monitoring data.	SE	Refer to Section 5.10.1 Golf Course Irrigation
	2.6.1.3 Groundwater monitoring		
159	The Department of Water Affairs required that the quality of all boreholes in the ground water quality network be analysed quarterly.	SE	Refer to Table 9: Compliance evaluation of the DWA General Authorisation section 9K nr 4

Table 9: Compliance evaluation of the DWA General Authorisation

9K DWA General Authorisation 16/2/7/K101/B19 30/03/2013																																																																													
1	Table 1: Quantity of Water Containing Waste for Irrigation <table><tr><th>Reference Name</th><th>Total area of land irrigated (ha)</th><th>Total volume (m³/day)</th><th>Total volume (m³/a)</th><th>Type of crop irrigated</th></tr><tr><td>Pinnacle Point Golf Estate</td><td>35.0</td><td>1 500</td><td>297 000</td><td>Bent/ Rye Grass</td></tr></table> 1. The quantity of wastewater authorised to be irrigated may not be exceeded without prior authorisation by the Department Table 2: Waste Disposal facilities <table><tr><th>Reference Name</th><th>Operational area (ha)</th><th>Total Capacity (m³)</th><th>Co-ordinates</th><th>Purpose</th></tr><tr><td>Pinnacle Point Golf Estate Irrigation Dam</td><td>1</td><td>24 830</td><td>34° 11'42.96"S 22° 04'41.75"E</td><td>Storage of waste water for irrigation</td></tr></table> 2. The quality of the water containing waste for irrigated may not exceed the parameter listed in Paragraph 1.7(1) of GA dated 6 September 2013 GG 36820 3. The quality of waste water disposed into the irrigation dam shall not exceed the following limits	Reference Name	Total area of land irrigated (ha)	Total volume (m ³ /day)	Total volume (m ³ /a)	Type of crop irrigated	Pinnacle Point Golf Estate	35.0	1 500	297 000	Bent/ Rye Grass	Reference Name	Operational area (ha)	Total Capacity (m ³)	Co-ordinates	Purpose	Pinnacle Point Golf Estate Irrigation Dam	1	24 830	34° 11'42.96"S 22° 04'41.75"E	Storage of waste water for irrigation	2																																																							
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		1. Monthly irrigation volumes for 2025 below. Volumes below 1500m³/day <table><tr><th>Month</th><th>Total used M3</th><th>Daily Average M3</th><th>Monthly average M3</th><th>Rainfall mm</th></tr><tr><td>Jan</td><td>34078</td><td>1135.93</td><td></td><td>71</td></tr><tr><td>Feb</td><td>32352</td><td>1115.59</td><td></td><td>20</td></tr><tr><td>Mar</td><td>19365</td><td>624.68</td><td></td><td>35</td></tr><tr><td>Apr</td><td>5012</td><td>167.07</td><td></td><td>35</td></tr><tr><td>May</td><td>11613</td><td>374.61</td><td></td><td>3</td></tr><tr><td>Jun</td><td>7659</td><td>255.30</td><td></td><td>17</td></tr><tr><td>Jul</td><td>14422</td><td>465.23</td><td></td><td>9</td></tr><tr><td>Aug</td><td>14540</td><td>469.03</td><td></td><td>6</td></tr><tr><td>Sep</td><td></td><td>0.00</td><td></td><td></td></tr><tr><td>Oct</td><td></td><td>0.00</td><td></td><td></td></tr><tr><td>Nov</td><td></td><td>0.00</td><td></td><td></td></tr><tr><td>Dec</td><td></td><td>0.00</td><td></td><td></td></tr><tr><td></td><td></td><td>4607.43</td><td></td><td></td></tr><tr><td></td><td>139041</td><td>383.95</td><td>11586.75</td><td>196</td></tr></table> 2. The Pinnacle Point Wastewater Treatment plant (WWTP) falls under the Mosselbay Municipality. Analyses of wastewater leaving the Pinnacle Point WWTP are conducted by the municipality. Verbal discussions with Mr R Visagie indicated that the monitoring results are conducted according to legal requirements. According to him monitoring results are not disclosed to the public, however he indicated that results are within wastewater limits as required by Table 3: Wastewater limits values related to disposal into water resource. Previous Audit (2024) Recommendation: Request these results from the Municipality monthly and keep these results available. – no results available for auditor to verify 3. Refer to nr 2 above: Additional irrigation analysis by the PPHOA is conducted quarterly by bemlab a SANAS accredited testing laboratory. Twenty constituents are analysed for the purposes of ensuring safe irrigation of the Golf Course. It is assumed that the Mosselbay Municipality analyse for the standard waste water	Month	Total used M3	Daily Average M3	Monthly average M3	Rainfall mm	Jan	34078	1135.93		71	Feb	32352	1115.59		20	Mar	19365	624.68		35	Apr	5012	167.07		35	May	11613	374.61		3	Jun	7659	255.30		17	Jul	14422	465.23		9	Aug	14540	469.03		6	Sep		0.00			Oct		0.00			Nov		0.00			Dec		0.00					4607.43				139041	383.95	11586.75	196
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Table 3: Wastewater limits values related to disposal into water resource

Variable	Limits
pH	5.5 - 9.5
EC (mS/m)	70 mS/m above intake to a maximum of 150 mS/m
Faecal coliforms (per 100ml)	1000
COD (mg/l)	75 (l)
Soap, oil, or grease (mg/l)	2.5
Suspended solids (mg/l)	25
NO ₃ /NO ₂ as N (mg/l)	15
NH ₄ as N (mg/l)	6
PO ₄ as P (mg/l)	10
F (mg/l)	1
Cl (mg/l)	0.25

4. The applicant shall develop a groundwater monitoring programme to determine the impact of all the waste water disposed onto the irrigation dam to the groundwater resource
5. The applicant shall analyse the quality of all boreholes in the groundwater quality network, quarterly for the following variables

Table 3: Monitoring Variables

Variables	
pH	Cl (mg/l)
EC (mS/m)	F (mg/l)
Faecal coliforms (per 100ml)	PO ₄ as P (mg/l)
COD (mg/l)	NH ₄ as N (mg/l)
Soap, oil, or grease (mg/l)	NO ₃ /NO ₂ as N (mg/l)
Suspended solids (mg/l)	Al (mg/l)
Na (mg/l)	SO ₄ (mg/l)

6. The date, time and monitoring point in respect of each sample taken shall be recorded together with the results of the analysis and the water quality report must be made available upon request to the Department
7. The conditions of the general authorisation must be strictly implemented and adhered to

variables as the following are not being analysed by the PPHOA, Chloride, SS, F, Grease, COD, Fluoride, F Coli, Ammonia(N), Ortho phosphate and Nitrate(N).

Previous Audit (2024) Recommendation: Requirement frequency stipulates monthly analyses instead of quarterly. It also stipulates constituents that has to be analysed for which are not analysed for. Revisit this requirement to ensure full compliance - The Municipality does monthly analysis of their WWTP effluent. According to verbal discussion with the M Visagie the auditor were informed that this is being done. This could not be verified as the analysis were not provided

Recommendation: Request monthly analysis from Mosselbay Municipality to be able to give proof of water quality limits during audits.

4. The applicant is not clear about the requirement of this condition. There are no boreholes on the estate as specified by EA, Extra condition 11, "no groundwater abstraction allowed on the estate". No groundwater quality network implemented. Irrigation dam is lined. Discussion with Mr R Visagie from Mosselbay Municipality indicated that no groundwater monitoring is currently taking place at the Pinnacle Point WWTP.

Previous Audit (2024) Recommendation: Seek advice from a groundwater specialist to assess this condition and current situation and suggest recommendations to comply with this condition. – Non-Compliant

Recommendation: Seek advice from DWA on this requirement

5. No boreholes on the estate
6. No boreholes on the estate
7. This condition is a statement and therefore not scored. Verification of these conditions is part of this audit.
8. This condition is a statement and therefore not scored. PPHOA take note of this condition

8. The conditions of this authorisation shall be brought to the attention of all persons(employees, sub-consultants, contractors etc.) associated with the undertaking of this activity 9. Should the circumstances regarding your water use change, you are kindly requested to approach this office for assistance 10. The Department will approach you should the GA be altered to such an extent that it may impact on the authorisation of you water use 11. Please take note that if you do not comply with the conditions of the GA you water use will be regarded as unlawful.	9. This condition is a statement and therefore not scored. PPHOA take note of this condition 10. This condition is a statement and therefore not scored. PPHOA take note of this condition 11. This condition is a statement and therefore not scored. PPHOA take note of this condition
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5.3 FINDINGS OF THE AUDIT

From the compliance evaluation three (3) non-compliances were raised against the requirements of the EA and EMPr. Refer to table 10 for a list of these non-compliances and recommendations. DWA General Authorisation recommendations are listed in table 11.

Table 10: Non-compliances/Partial-compliances & Recommendations EA & EMPr

Section Reference	Management Outcome	Compliance Status	Audit Finding/Link to Non-Compliance or Partial Compliance	Required action and recommendation
5.3 / EMPr 1.1	Ensure the Environmental Management Programme (EMPr) remains current and aligned with approved requirements and amendments.	Non-compliant	EMPr was not updated at the required 2-year intervals as specified in the EMPr (missed updates in multiple cycles). The EMPr specifies a requirement for updates every two years, with the responsibility falling on the PPHOA to ensure compliance. It appears that while there was an attempt to update the EMPr in 2019, it hasn't yet been approved. The lack of updates in 2017, 2020, and 2023 still represents a deviation from the specified timeline outlined in the approved EMPr, which requires updates every two years.	Recommendation: It is proposed that the Environmental Management Programme (EMPr) be amended on an as-needed basis, rather than at fixed intervals, and specifically where required by environmental audit findings. This approach aligns with the Environmental Impact Assessment Regulations, which require amendments where there are changes in project scope, environmental impacts, or where improvements to management measures are necessary. This ensures that the EMPr remains relevant and effective. It is proposed that the EMPr is updated accordingly with the audit recommendations.

Section Reference	Management Outcome	Compliance Status	Audit Finding/Link to Non-Compliance or Partial Compliance	Required action and recommendation
5.3 / EMPr 5.1	Ensure continuous environmental compliance monitoring through regular auditing.	Non-compliant	Annual audits were conducted in 2018, 2024 and 2025. Annual audits were not conducted in 2017, 2020 to 2023. Although annual environmental audits were not conducted between 2016 and 2023, the 2024 audit marks a return to compliance with the approved 2014 EMPr. Until the 2019 revised EMPr is formally approved, the requirement for annual audits remains applicable. Therefore, the absence of audits during the intervening years constitutes non-compliance with the current EMPr, despite the recent corrective action.	Recommendation: The proposed five (5) year audit interval is considered appropriate for the current operational phase, where activities are stable, environmental risks are low, and a strong track record of compliance has been demonstrated. The Environmental Impact Assessment Regulations do not prescribe a fixed audit frequency, allowing for a risk-based approach. It is therefore reasonable to reduce the audit frequency to five yearly, subject to approval by the Department of Environmental Affairs and Development Planning, and to update the EMPr accordingly. It is proposed that the EMPr is updated accordingly.
5.3 / EMPr Section 4.3	Environmental incidents and complaints are effectively identified, recorded in the designated register, investigated, and resolved with corrective and preventative actions to ensure regulatory compliance and prevent recurrence	Non-compliant	Procedural non-compliance: No proof provided of registered complaint(2022) by homeowner in Environmental Incident/Complaint register. This demonstrates a non-compliance with the requirements of OEMP Section 4.3 <i>"Maintain a record of environmental incidents as well as corrective and preventative measures taken"</i>	Recommendation: • Maintain a record of environmental incidents as well as corrective and preventative measures taken. • Record the 2022 complaint retroactively, including corrective and preventative measures taken.

Section Reference	Management Outcome	Compliance Status	Audit Finding/Link to Non-Compliance or Partial Compliance	Required action and recommendation
5.3/ Conservation Management Programme (2018). Section 3.2.3	Ongoing erosion on the estate is effectively identified, recorded in the Environmental Incident/Complaint Register, investigated, and managed through appropriate corrective and preventative measures (e.g., stabilisation, rehabilitation, and monitoring) to prevent further environmental degradation, sedimentation, habitat loss, or impacts on adjacent sensitive areas (such as heritage or conservation zones)	Partially compliant	Erosion partial compliance: Erosion between 6th and 7th hole, (Erf 17852 and Erf 17851). The Estate has demonstrated meaningful progress by moving from initial temporary (nature based) stabilisation measures to a professionally engineered long-term solution however implementation and rehabilitation remain incomplete. This demonstrates a partial compliance with the requirements of CMP Section 3.2.3 <i>“To respond to all erosion problems as soon as they are identified by identifying the cause of erosion and treating the cause as well as the erosion to repair the damage”</i>	Recommendation: • The Estate must implement appropriate measures to address the erosion and ensure that all activities are undertaken in compliance with applicable environmental legislation and authorisations. • Maintain records of erosion management actions undertaken and implementation timelines for further rehabilitation measures. • Continue monitoring the site as stipulated by the Conservation Management Programme (2018))
5.3 / EA Condition 15	Maintain adequate institutional and financial mechanisms to support long-term environmental management.	Partially compliant	Institutional arrangements have evolved (PPHOA managing), but EMPr not updated to reflect this. Pinnacle Point Beach and Golf Resort established a Conservation Trust on September 20, 2007, according to the Deed of Trust. However due to Pinnacle Point Resort (Pty) Ltd, liquidation in November 2011, the Pinnacle Point Home Owners Association (PPHOA) has taken over these responsibilities. The funding for managing the estate, including the implementation of the Operational Environmental Management	Recommendation: Update the EMPr to reflect that the Pinnacle Point Home Owners Association (PPHOA) has assumed responsibility for the Conservation Trust and that environmental management is funded through levies.

Section Reference	Management Outcome	Compliance Status	Audit Finding/Link to Non-Compliance or Partial Compliance	Required action and recommendation
			Plan (EMPR) and associated appendices and management plans, is provided through levies collected from the homeowners. The Financial Manager has verified the Pinnacle Point Home Owners Association's FY2026 Consolidated Budget in collaboration with the Auditor. PPHOA is confident that the funds allocated for environmental management in previous financial years, as well as those earmarked for upcoming years, are sufficient to ensure continued implementation and compliance with the Environmental Authorisation (EA) and Environmental Management Programme (EMP) requirements. Proof of Email 6/10/2025	
5.3 / EMPr 4.1	Maintain an accurate and up-to-date environmental management structure.	Partially compliant	Organogram not aligned with current structure	Recommendation: Update the EMPr to include the current organisational structure (organogram).
5.3 / EMPr 4.2	Ensure clear allocation of environmental management roles and responsibilities.	Partially compliant	Although roles and responsibilities for environmental management have evolved over time, the allocation of such responsibilities remains clear and effectively implemented, and is therefore considered compliant. However, the Environmental Management Programme (EMPr) has not been updated to reflect these changes and should be revised accordingly and submitted	Recommendation: Update the EMPr to reflect current roles and responsibilities.

Section Reference	Management Outcome	Compliance Status	Audit Finding/Link to Non-Compliance or Partial Compliance	Required action and recommendation
			to the Department of Environmental Affairs and Development Planning for approval	
5.3 / EMPr 4.4	Ensure effective environmental awareness and training aligned with EMPr requirements.	Partially compliant	Training conducted, but not clearly linked to EMPr requirements <i>“As a minimum, training should include:</i> <i>• Explanation of the importance of complying with the EMPR and the employees accountability;</i> <i>• Discussion of the potential environmental impacts of construction activities;</i> <i>• The benefits of improved personal performance;</i> <i>• Employees’ roles and responsibilities, including emergency preparedness;</i> <i>• Explanation of the mitigation measures that must be implemented when carrying out their activities;”</i> <i>• Explanation of the specifics of this EMPR and its specification (no-go areas, etc.)</i> <i>• Explanation of the management structure of individuals responsible for matters pertaining the EMPR.</i> Induction training resides with EM. Training material and attendance registers verified by auditor.	Recommendation: Revise induction and training material to explicitly reference the EMPr, including its legal status and applicable environmental obligations.

Section Reference	Management Outcome	Compliance Status	Audit Finding/Link to Non-Compliance or Partial Compliance	Required action and recommendation
			The induction training includes important environmental instructions (e.g., staying within netted areas, protecting flora and fauna, spill reporting), which align with EMP principles. Attendance registers for 2025 confirm participation by key contractors. Attendance registers available for contractors Rawland, Tinshack, Premier Gardens, E-Power, Prosite, ArnoTrim. The House Rules outline specific transgressions related to environmental harm, reinforcing behavioral expectations on site. (e.g <i>littering, lighting a fire, disturbing, collecting, harming or destroying any flora in open areas or undisturbed areas, chasing, trapping or interfering with fauna, damaging heritage sites etc</i>). In the Architectural guideline the requirement to adhere to the PPHOA Environmental Management Plan during construction is explicitly stated.	
5.3 / EMPr 5.7	Ensure that fire management practices are appropriate, effective, and aligned with current site conditions and risks.	Partially compliant	Fire management implemented, but differs from EMPr (e.g. brushcutting vs burning). Fire management at Pinnacle Point is overseen by the PPHOA in accordance with the Fire Management Plan (FMP), which outlines prescribed burning requirements through 2028. However, the Environmental Manager (EM) has confirmed that current fire fuel reduction is being implemented	Recommendation: Update the Fire Management Plan to reflect current practices (e.g. brushcutting and fuel load reduction in place of controlled burning where appropriate).

Section Reference	Management Outcome	Compliance Status	Audit Finding/Link to Non-Compliance or Partial Compliance	Required action and recommendation
			through brushcutting and the removal of dead plant material, while carefully preserving the seed bed. This approach aligns with the FMP and avoids the use of burning, which has proven to be impractical and poses significant risks to nearby residential properties. Experience has demonstrated that reducing fuel loads—such as dry leaves, twigs, and branches—effectively lowers wildfire intensity and spread. Mechanical clearing methods like brushcutting also support the maintenance of firebreaks, enhance safety near homes, and preserve ecological integrity by allowing native vegetation to regenerate naturally. While burning remains a component of broader fire management strategies, brushcutting and debris removal are currently the preferred and more viable alternatives in sensitive or densely populated areas.. Given the high impact and risks associated with burning near homes, the EM is consulting a fire specialist to reassess the current strategy. A formal reconsideration of the burning approach is now underway	
5.3 / EMPr	Ensure that environmental monitoring programmes	Partially compliant	Soil monitoring approach differs from EMPr and lacks updated justification. Soil analysis	Recommendation: Update the EMPr to reflect the current soil monitoring

Section Reference	Management Outcome	Compliance Status	Audit Finding/Link to Non-Compliance or Partial Compliance	Required action and recommendation
5.10.1	are scientifically justified and aligned with site-specific conditions.		conducted every 3 months is available for holes 4, 15 & 18.. It was explained to the auditor that soil irregularities are expected to be detected through sampling at three key areas, which are considered representative of broader site conditions. Specifically: a. Holes 1, 2, and 4 are indirectly covered through analysis conducted at Hole 4 b. Additional coverage is provided by sampling at Hole 15, which informs analysis for Holes 16 c. Coverage is provided by sampling at Hole 18,m which informs analysis for Hole 10 However, the rationale behind the Environmental Management Programme Report (EMPR) specifying Holes 1, 2, 4, 10, 16, and 18 as sampling points remains unclear. To ensure alignment with environmental monitoring objectives in the EMP this needs to update as part of an EMP update.	rationale and sampling locations.
5.3 / EMPr 5.10.2, 5.10.3, 5.10.4, 5.10.5, 5.10.6, 5.10.7,	Promote resource efficiency and sustainable infrastructure practices	Partially compliant	Measures likely implemented but not formally documented in EMPr/guidelines EMPR 5.10.2: Dual flush toilets -Update guideline document to include this	Recommendation: Update applicable guideline documents to include requirements for water conservation, energy efficiency, and waste

Section Reference	Management Outcome	Compliance Status	Audit Finding/Link to Non-Compliance or Partial Compliance	Required action and recommendation
5.10.9, 5.11.2, 5.11.4, 5.11.5, 5.11.6, 5.11.7, 5.13.3	within the development.		recommendation. EMPR 5.10.3: Low flow shower heads - Update guideline document to include this recommendation EMPR 5.10.4: Low flow taps - Update guideline document to include this recommendation EMPR 5.10.5: Washing machines - Update guideline document to include this recommendation EMPR 5.10.6: Geyser and pipe insulation - Update guideline document to include this recommendation EMPR 5.10.7: Swimming pools – Update guideline document to include this recommendation EMPR 5.10.9: Rainwater storage tanks – Update guideline document to include this recommendation EMPR 5.11.2: Solar heating water systems – Update guideline document to include this recommendation EMPR 5.11.4: Energy efficient appliances - Update guideline document to include this recommendation EMPR 5.11.5 Solar cooling systems – Update guideline document to include this recommendation EMPR 5.11.6: Evaporative cooling systems - Update guideline document to include this recommendation	management measures.

Section Reference	Management Outcome	Compliance Status	Audit Finding/Link to Non-Compliance or Partial Compliance	Required action and recommendation
			EMPR 5.11.7: Geyser and pipe insulation - Update guideline document to include this recommendation EMPR 5.13.3: Biodegradable refuse - Update guideline document to include this recommendation	
5.3/EMPR	Ensure game management practices remain appropriate, sustainable, and adaptive	Partially compliant	Only 8 Zebras on site, no need for annual assessment	Recommendation: Update EMPR to reflect accordingly
5.3/Appendix 9B Sec 2.4	Ensure fire management planning reflects current land use and external development pressures.	Partially compliant	FMP includes areas no longer under control (municipal land). The FMP includes the portion of Municipal land adjacent to Louis Fourie Road that is planned for development by the Municipality. The affected blocks are 14, 15, 16 and 17. These blocks should no longer be considered part of the Estate for conservation management. Once the cemetery and new road section that are planned in blocks 15 and 16 have been developed, the width and position of fire breaks on the boundary need to be reviewed, as these developments will represent new potential points of ignition	Recommendation: Update the Fire Management Plan to exclude municipal land no longer under conservation management and revise firebreak requirements accordingly.
5.3/Appendix 9B Sec 3.3.4	Ensure Asset Protection Zone (APZ) requirements are practical and	Partially compliant	APZ requirements not practically implementable in current layout. Main office building has an APZ, but not residences. This requirement conflicts with the requirements	Recommendation: Update the Fire Management Plan with the reviewed APZ requirements to reflect a feasible

Section Reference	Management Outcome	Compliance Status	Audit Finding/Link to Non-Compliance or Partial Compliance	Required action and recommendation
	implementable.		for footprint erven and wind break planting next to pools. Reconsider this requirement in the Fire Management plan d to ensure full compliance.	and effective approach.
5.3 / Conservation Programme (2018)	Maintain an up-to-date biodiversity inventory to support conservation management.	Partially compliant	The species list has not been updated and may not reflect current conditions. It should be reviewed and updated accordingly	Recommendation: Appoint a qualified botanist or botany student to undertake a survey and update the species inventory.

Table 11: Non-compliances/ Partial-compliances & Recommendations Water Use Licence

Section Reference	Management Outcome	Compliance Status	Audit Finding/Link to Non-Compliance or Partial Compliance	Required action and recommendation
5.3 / GA 16/2/7/K101/B19 30/03/2013 (Wastewater)	Demonstrate compliance with wastewater standards.	Partially compliant	Monitoring is conducted by municipality, but data not available for audit. The Pinnacle Point Wastewater Treatment plant (WWTP) falls under the Mosselbay Municipality. Analyses of wastewater leaving the Pinnacle Point WWTP are conducted by the municipality. Verbal discussions with Mr R Visagie indicated that the monitoring results are conducted according to legal requirements. According to Mr Visagie monitoring results are not disclosed to the public, however he indicated that results are within wastewater limits as required by GA	Recommendation: Obtain monthly wastewater analysis results from Mossel Bay Municipality to provide verifiable proof of compliance during audits.

			Table 3: Wastewater limits values related to disposal into water resource. Additional irrigation analysis by the PPHOA is conducted quarterly by bemlab a SANAS accredited testing laboratory. Twenty constituents are analysed for the purposes of ensuring safe irrigation of the Golf Course. It is assumed that the Mosselbay Municipality analyse for the standard waste water variables as the following are not being analysed by the PPHOA, Chloride, SS, F, Grease, COD, Fluoride, F Coli, Ammonia(N), Ortho phosphate and Nitrate(N).	
5.3 / GA 16/2/7/K101/B19 30/03/2013 (Groundwater)	Ensure potential groundwater impacts are appropriately assessed and managed.	Partially compliant	Monitoring requirements unclear / not implemented. The applicant is not clear about the requirement of this condition. There are no boreholes on the estate as specified by EA, Extra condition 11, " <i>no groundwater abstraction allowed on the estate</i> ". No groundwater quality network implemented. Irrigation dam is lined. Discussion with Mr R Visagie from Mosselbay Municipality indicated that no groundwater monitoring is currently taking place at the Pinnacle Point WWTP	Recommendation: Seek formal guidance from the Department of Water and Sanitation (DWS) regarding groundwater monitoring requirements and applicability.

Table 12: Proposed changes to EMP

Page/Section	Existing approved OEMP	Replace with the below proposed changes (in red)
Pg 4: Section 1.1: Revisions of this OEMP	Updated versions of any of the Appendices must be noted and reported in the Annual Audit and the OEMP updated to reflect significant changes (to Addendums also) every two (2) years from date of approval.	Any updated versions of the Appendices must be noted and reported during external environmental audits. The OEMP must be revised to reflect significant changes, including addendums, where there are changes in project scope, environmental impacts, required improvements to management measures, or changes arising from environmental audit findings approved by the competent authority
Pg 5: Section 1.2: Purpose of OEMP	This OEMP is viewed as a dynamic document that should be reviewed and updated on a continual basis.	This OEMP is viewed as a dynamic document that should be reviewed and updated as prescribed in section 1.1: Revisions of this OEMP.
Pg 49: Section 8: Conclusion	The PPHOA must ensure that the OEMP is updated every two (2) years and all previous versions of the OEMP must be kept on file for future reference.	The PPHOA must ensure that the OEMP is updated as prescribed in section 1.1: Revision of this OEMP and all previous versions of the OEMP must be kept on file for future reference.
Pg 24: Section 5.1 Annual Compliance Audit	Annual Compliance Audit	Compliance Audit
Pg 23: Section 5.1 Annual Compliance Audit	In the absence of an Environmental Liaison Committee (ELC) ¹ it is the recommendation of this OEMP that an Annual OEMP Compliance Audit be undertaken as a motion to ensure compliance with the OEMP.	It is the recommendation of this OEMP that OEMP compliance audits be undertaken every 5 years as a motion to ensure compliance with the OEMP

¹ The ELC was a condition of the EA to oversee the construction phase. The ELC has subsequently been disbanded.

Pg 23: Section 5.1 Annual Compliance Audit	Annual OEMP	OEMP Compliance Audit
Pg 34: Section 5.3 Funding	Annual OEMP Compliance Audit	OEMP Compliance Audits
Pg 3: Introduction	Annual Audits	Audits
Pg 8: Section 2.2 Site Amenities	Annual Compliance Audit	Compliance Audits
Pg 8: Section 2.2 Site Amenities	Annual Compliance Audit	Compliance Audits
Pg 32: Section 5.9 Environmental Awareness and Education	Annual OEMP Compliance Audit	OEMP Compliance Audits
Pg 35: Section 5.10 Water Conservation and Monitoring	Annual OEMP Compliance Audit	OEMP Compliance Audits
Pg 36: Section 5.10 Water Conservation and Monitoring	Annual OEMP Compliance Audit	OEMP Compliance Audits
Pg 38: Section 5.10.1 Golf course irrigation	Annual OEMP Compliance Audit	OEMP Compliance Audits
Pg 43: Section 5.12 Wildlife Management	Annual OEMP Compliance Audit	OEMP Compliance Audits
Pg 44: Section 5.12 Wildlife Management	Annual assessment/audit	assessment/audit
Pg 49 Conclusion	Annual Compliance Audit	Compliance Audits
Pg 20 Section 4.4 Pinnacle Point Conservation Trust	The Trust's activities are funded by the PPHOA	The Trust's activities are funded by the PPHOA. The PPHOA has assumed responsibility for the Conservation Trust and the funding for managing the estate, including the implementation of the OEMP and associated appendices and management plans is provided through levies collected from the homeowners.
Pg 20 Section 4.4	Current Organogram with functions	New Organogram with functions

Pg 17 Section 4 Roles and Responsibilities	The GM oversees individual Department Managers which inter alia include the Director of Golf, Technical Manager and the Estate Conservation Officer (ECO)	The GM oversees individual Department Managers which inter alia include the Director of Golf, Technical Manager Golf Superintendent and the Estate Conservation Officer (ECO) during construction and Environmental Manager.
Pg 18 Section 4.2 Technical Division	The Technical Manager is one of the department managers that reports directly to the GM Contractor induction, compliance with architectural guidelines, stormwater management, and waste management, fall within his/her scope of works. The following entities all report to the Technical Manager who in turn report on relevant matters to the GM.	The Technical Manager Environmental Manager is one of the department managers that reports directly to the GM and is responsible for environmental management during operations. Contractor induction, compliance with architectural guidelines, stormwater management, and waste management, alien eradication burning plan, conservation areas management, archaeological management and landscaping fall within his/her scope of works. The following entities all report to the Technical Manager Environmental Manager who in turn report on relevant matters to the GM.
Pg 20 Section 4.4 Environmental Induction and Training	The ECO or PPHOA in consultation with the Technical Manager shall	The ECO or PPHOA in consultation with the Technical Manager Environmental Manager shall
Pg 21 Section 4.5 Golf Operations	The Director of Golf reports directly to the GM. The Golf Course Deputy, Greenkeeper / Spray Technician and the Assistant Spray Technician all report to the Director of Golf. The Irrigation Technician, as a specialised division, reports to the Deputy Greenkeeper.	The Director of Golf reports directly to the GM. The Golf Course Superintendent manages the supervisor, irrigation technician, machine operator, greenkeeper and beautification employee and, Deputy Greenkeeper / Spray Technician and the Assistant Spray Technician all report to the Director of Golf. The Irrigation Technician, as a specialised division, reports to the Deputy Greenkeeper.
Pg 30 Section 5.7 Fire Management	The Environmental Conservation Officer (ECO) is responsible for alignment of these activities in the following repetitive cycles (unless otherwise determined by the Fire Management Plan)	The Environmental Conservation Officer (ECO) Environmental Manager is responsible for alignment of these activities in the following repetitive cycles (unless otherwise determined by the Fire Management Plan)
Pg 31 Section 5.6 Alien	Alien clearing and management is the	Alien clearing and management is the responsibility of the

Vegetation Management Plan	responsibility of the Estate Environmental Conservation Officer (ECO) who in consultation with the Conservation Trust oversees implementation of optimal alien clearing. Both parties must ensure compliance with alien clearing requirements. The ECO and representative of the Conservation Trust must report back on any non-compliance to the GM at weekly feedback sessions.	Estate Environmental Conservation Officer (ECO) Environmental Manager during operation who in consultation with the Conservation Trust oversees implementation of optimal alien clearing. Both parties must ensure compliance with alien clearing requirements. The Environmental Manager and representative of the Conservation Trust must report back on any non-compliance to the GM at weekly feedback session.
Pg 32 Section 5.7 Fire Management	Fire management is the responsibility of the Estate Environmental Officer (ECO) who in consultation with the Conservation Trust oversees implementation of the Integrated Fire Management Plan	Fire management is the responsibility of the Estate Environmental Officer (ECO) Environmental Manager who in consultation with the Conservation Trust oversees implementation of the Integrated Fire Management Plan. The ECO Environmental Manager and representative of the Conservation Trust must report back on any non-compliance to the GM at weekly feedback sessions.
Pg 33 Section 5.8 Archaeology Conservation Management	Archaeological monitoring falls within the responsibilities of the Estate Environmental Officer (ECO)	Archaeological monitoring falls within the responsibilities of the Estate Environmental Officer (ECO) Manager
Pg 37 Section 5.10.1 Golf course irrigation	soil samples adjacent to above mentioned golf course holes must be taken regularly (quarterly is optimum) to have comparative data from which to determine if any leaching is taking place from the golf course into natural vegetation areas – in the event that the data shows an increase in unwanted chemistry/salt values the irrigation system must be adapted to adjust the irrigation impact	Soil analysis shall be conducted every three (3) months at Holes 4, 15, and 18. These sampling locations have been identified as representative of the broader site conditions and are used to monitor soil quality across the site. Soil irregularities are detected through sampling at these three key monitoring points, which provide representative coverage for additional areas on site, as outlined below: Hole 4 sampling provides representative monitoring for Holes 1, 2, and 4. Hole 15 sampling provides representative monitoring for Holes 15 and 16. Hole 18 sampling provides representative monitoring for

		Holes 18 and 10. Should any soil contamination or irregularities be identified in the sampled holes, additional sampling must be undertaken at the associated holes to determine the extent and implement appropriate remediation measures if required. This monitoring approach ensures adequate site-wide soil quality monitoring while maintaining a practical and cost-effective sampling programme.
Pg 43 Section 5.11 Energy Conservation	Energy and water conservation initiatives are the responsibility of the ARC in collaboration with the Estate Environmental Officer (ECO) and Technical Manager	Energy and water conservation initiatives are the responsibility of the ARC in collaboration with the Estate Environmental Officer (ECO) and Technical Manager Environmental Manager
Pg 44 Section 5.12 Wildlife Management	The ECO, in collaboration with the Conservation Trust, are responsible for implementation of the monitoring plan Any problems with the activity of game management must be reported to the GM at weekly feedback meetings.	The ECO, in collaboration with the Conservation Trust, are responsible for implementation of the monitoring plan during construction and the Environmental Manager during operation. Any problems with the activity of game management must be reported to the GM at weekly feedback meetings.
Pg 48 Section 5.14 Authorisations, permits and licenses	With the exception of introduction of game (Conservation Trust), the ECO is considered to be the responsible party with whom individuals on the Estate can make contact to ensure that they comply and obtain relevant permits / licenses / authorisation as may be required	With the exception of introduction of game (Conservation Trust), the ECO or Environmental Manager is considered to be the responsible party with whom individuals on the Estate can make contact to ensure that they comply and obtain relevant permits / licenses / authorisation as may be required

5.4 CONTINUED ADEQUACY OF THE EMPR

An EMPR amendment application was submitted to DEA&DP during 2019; however the process was not completed and not approved. The recommendation is to amend the EMPR to incorporate all the necessary changes and to seek approval from the DEA&DP.

5.4.1 NEW IMPACTS IDENTIFIED

Based on the areas inspected and information made available during the environmental audit, no new environmental impacts were identified.

Erosion management on the Estate was identified and assessed as a potential environmental impact during the original Environmental Authorisation (EA) process, and the associated management measures and desired outcomes are included in the Environmental Management Programme (EMPr) and Conservation Management Plan (2018) and therefore erosion management on the estate is not considered a new environmental impact for purposes of this audit.

A registered Environmental Assessment Practitioner (EAP) has been consulted by the PPHOA to determine whether the proposed remediation activities of the reported erosion may trigger the need for any environmental authorisation, permit, licence, or other regulatory approval in terms of applicable environmental legislation before the works are implemented.

5.4.2 EFFECTIVENESS OF THE EMPR

Based on the information review, and areas inspected during the audit, the EMPR is currently considered adequate and effective to manage and mitigate the current activities and impacts of the project.

5.4.3 SHORTCOMINGS IN THE EMPR

Based on the information review and areas inspected during this audit, it is the auditor's interpretation that the EMPR did not have any shortcomings.

5.4.4 RECOMMENDATIONS

It is recommended that the project should continue to manage the EMPR requirements. Implementing the recommended actions will further strengthen compliance.

6. CONCLUSION

CIMARRON CONSULTANTS (PTY) LTD was appointed by PPHOA to undertake the fourth (4) annual – environmental audit to assess compliance with the conditions of the EA and EMPR.

The audit conducted independently and in accordance with NEMA regulations, found that out of a total of hundred and forty three (143) EA and EMPR conditions assessed, the majority, 116, were found to be in full compliance with the applicable requirements. Additionally, 24 conditions were in partial compliance, indicating areas where improvements or adjustments may be needed to fully meet the requirements. However, there were three (3) instances of non-compliance identified. Two (2) of the eleven (11) DWA General Authorisation, conditions were found to be in partial compliance, while the remaining 9 were assessed as compliant.

The audit recommends actions to address the identified non-compliances and partial compliances, and propose amendments to the approved EMPr.

In conclusion, the 2025 Environmental Audit for the Pinnacle Point Residential Golf Resort Development confirms that the project remains largely compliant with its Environmental Authorisation (EA) and approved Environmental Management Programme (EMPR).

On-going improvement and compliance with the Environmental Authorisation (EA) and Environmental Management Programme Report (EMPR) will support the long-term sustainability and environmental integrity of the Pinnacle Point development.

PPHOA should be reminded of the following

1. Requirements of Regulations 34 of the EIA Regulations, 2014 with regards to findings of the adequacy of the EMPR and access to the audit report. Regulation 34 states:

6) Within 7 days of the date of submission of an environmental audit report to the competent authority, the holder of an environmental authorisation must notify all potential and registered interested and affected parties of the submission of that report, and make such report immediately available-

a) to anyone on request; and

b) on a publicly accessible website, where the holder has such a website.

2. EMP Section 5.1

***“Annual Compliance Audit: The PPHOA must be given a reasonable opportunity (not exceeding 2 months after completion of the audit) to review and comment on the audit report where it will be the responsibility of the PPHOA to Submit copies of the audit report with their Response Report to the Provincial Department of Environmental Affairs & Development Planning, the Mossel Bay Municipality and Heritage Western Cape for their records and/or further actions within two months of completing their Response Report.*”**

7. ASSUMPTIONS, LIMITATIONS AND GAPS IN KNOWLEDGE

The following assumptions, limitations and gaps in knowledge apply to the audit:

- The information contained in this report was sourced from information and data supplied by third parties that is assumed to be complete, valid and true.
- This report is based on information available at the time of the assessment. The information, data, observations and evidence on what this report is based is beyond the control of Cimarron and may change without notice. Cimarron will not be liable for any loss or damage which may arise directly or indirectly because of such changes.
- The audit was based on documentation and areas made available by the holder, and that material known to the holder but not disclosed cannot be taken as compliant by default.
- Where reference is made to legislation or other statutory provisions in this report the original legislation or other statutory provisions will always take precedence and the reader is directed to revert to the original legislation or statutes.

Appendix A: ROD and EA Key factors of decision verification

ROD 2003 EG12/2/1-74-Erf2001& Erf3438	
Key factors affecting the decision	Verification
The golf estate is in line with the intent of Southern Cape Municipalities of developing a golf mecca, because golf tourists generate a lot of income for the area	Pinnacle Point Golf Estate aligns with the strategic vision of Southern Cape municipalities to establish the region as a premier golf tourism destination. The estate has consistently attracted both domestic and international golf tourists through its award-winning course design, luxury accommodations, and world-class amenities. Recognized multiple times by the World Golf Awards as Africa's Best Golf Course, Pinnacle Point enhances the region's reputation and appeal to high-value visitors. The estate contributes significantly to the local economy by generating tourism-related income through green fees, hospitality services, property investment, and employment opportunities. Its proximity to George Airport and integration into the scenic Garden Route further support its role as a cornerstone of golf tourism in the Southern Cape. By fostering sustainable tourism and offering a globally competitive golfing experience, Pinnacle Point is fully compliant with—and actively advancing—the municipalities' goal of creating a vibrant, income-generating golf mecca.
The development will go a long way towards much – needed economic injection into the Mosselbay economy	See above
More than fifty percent of the total erf is set aside for a nature reserve	In addition to its contribution to golf tourism, Pinnacle Point Golf Estate demonstrates a strong commitment to environmental sustainability. More than fifty percent of the total erf has been set aside for a nature reserve, preserving indigenous flora and fauna and maintaining the ecological integrity of the area. This dedication to conservation enhances the estate's appeal to eco-conscious travellers and aligns with the broader goals of the Southern Cape municipalities to promote tourism that is both economically beneficial and environmentally responsible.
The funds generated from the HOA is planned for maintaining the conservation worthy part of the land thus ensuring that the development remains	The Financial Manager has verified the Pinnacle Point Home Owners Association's FY2026 Consolidated Budget in collaboration with the Auditor. PPHOA is confident that the funds allocated for environmental management in previous financial years, as well as those

environmental sustainable as well as economically sustainable	earmarked for upcoming years, are sufficient to ensure continued implementation and compliance with the Environmental Authorisation (EA) and Environmental Management Programme (EMP) requirements.
Given the applicants financial imperatives, the extent to which the proposed activity has been modified to accommodate environmental consideration is recognised and together with the proposed mitigation measures will ensure that there are no environmental impacts so severe as to suggest that the proposed activity should not occur	The 2024 audit, along with the current audit, underscores Pinnacle Point Golf Estate's sustained dedication to transparency, environmental stewardship, and alignment with the environmental authorisation and environmental management plan.
80% of the site will be earmarked for conservation and the applicant has committed to this. Approximately 42% of the site (185ha) is transformed	Proof of renewed lease agreements verified
The requirement for a CEMP and Archaeological Conservation Management Plan(ACMP) will adequately respond to the heritage resources on site	CEMP has been implemented and has been incorporated into the internal guideline documents of the estate. Archaeological Conservation Management Plan (ACMP) 2014 has been approved and implemented. Refer to 2025 Audit report verification tables for more information.
The currently proposed development as detailed in the latest development plan submitted by Planning Partners dated 19 August 2003, represents a significant departure from the originally proposed and the derivation of this plan reflects an iterative response to the various environmental constraint and opportunities identified during the EIA	No modifications or expansions have been made beyond those outlined in the original development plan. Erven not yet developed are indicated in the report.
Public consultation: No significant objections to the proposed activity	As of the latest review, no significant objections have been raised regarding the proposed activities. This ongoing community acceptance reflects the estate's alignment with local interests and its commitment to responsible development that benefits both residents and the broader Southern Cape region.
The environmental legislation, principles of sustainable development and the preservation of the important pocket of land will not be best served by refusing the proposed beach and Golf Club development. The levies and other funds from the HOA will provide sufficient	The Financial Manager has verified the Pinnacle Point Home Owners Association's FY2026 Consolidated Budget in collaboration with the Auditor. PPHOA is confident that the funds allocated for environmental management in previous financial years, as well as those earmarked for upcoming years, are sufficient to ensure continued implementation and compliance with the Environmental Authorisation (EA) and Environmental Management

funds to conserve the sensitive vegetation and archaeological artefacts found on site.	Programme (EMP) requirements.
Amended EA 2013 16/3/1/5/D6/28/0011/13	
Reasons for decision	
The environment and the rights and interests of other parties are not likely to be adversely affected by this decision to amend the EA	As of the latest review, no significant objections have been raised regarding the proposed activities. This ongoing community acceptance reflects the estate's alignment with local interests and its commitment to responsible development that benefits both residents and the broader Southern Cape region.
Pinnacle Point Residential Golf Resort Development strictly implemented in accordance with the EA and the transfer is unlikely to negatively affect the rights of I&AP's	The proposed development is unlikely to negatively affect the rights or interests of Interested and Affected Parties (I&APs), as confirmed through ongoing public consultation and compliance audits.
Pinnacle Point (Pty) Ltd was liquidated in November 2011 and the PPPHOA has taken over the management responsibilities for the Resort	The Pinnacle Point Property Homeowners Association (PPPHOA) assumed full management responsibilities for the Resort.
The fact that there is currently no legal entity that can be held responsible for the ensuring compliance with the conditions of the EA	The Pinnacle Point Property Homeowners Association (PPPHOA) assumed full management responsibilities for the Resort.
The transfer of the EA onto the PPHOA will ensure that there is a responsible party that can be held accountable for noncompliance with the EA	The Pinnacle Point Property Homeowners Association (PPPHOA) assumed full management responsibilities for the Resort. Compliance with the EA and EMP is confirmed through compliance audits
The lease agreement for conservation areas that was signed between the PPHOA and the Mosselbay Municipality	Proof of renewed lease agreements verified
The fact that the PPHOA has proven that they are capable, financially and otherwise to implement the mitigation measures in the EMP and the EA.	The Pinnacle Point Property Homeowners Association (PPPHOA) assumed full management responsibilities for the Resort. Compliance with the EA and EMP is confirmed through compliance audits

APPENDIX B
Approved Public Participation Plan

PROPOSED PUBLIC PARTICIPATION PLAN

Environmental Audit Report Pinnacle Point Residential Golf Resort Development

Portion of Remainder Erf 2001 and Erf 3438
Mosselbay
Western Cape

DEADP Ref nr: 16/3/1/5/D6/28/0011/13

March 2026

Prepared by: Esca Coetzee
Cimarron Consultants (Pty) Ltd
Cell: +27 82 875 6800
Email: esca@cimarroncoaching.co.za

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1. INTRODUCTION

This Public Participation Plan (PPP) has been prepared to support the annual Environmental Audit for the Pinnacle Point Residential Golf Resort Development located in Mossel Bay, Western Cape.

The Environmental Authorisation (EA) was originally issued in 2003 and later transferred to the Pinnacle Point Home Owners Association (PPHOA) in 2013. The audit is undertaken in terms of Regulation 34 of the EIA Regulations, 2014, under the National Environmental Management Act (Act 107 of 1998).

The development is currently in its operational phase and consists of an 18-hole championship golf course, residential units, hotel facilities, and associated infrastructure over approximately 4.51 km², with limited ongoing construction of remaining dwellings.

This PPP outlines the process to notify Interested and Affected Parties (I&APs) and provide an opportunity to comment on the findings of the Environmental Audit.

The initial version of the Final Environmental Audit Report was submitted to DEADP on 6 November 2025, and a follow-up meeting was held on 17 March 2026. During this initial submission, previous Interested and Affected Parties (I&APs) were notified via email. Proof of email available in Annexure D

2. PURPOSE OF PUBLIC PARTICIPATION

The objectives of the public participation process are to:

- Inform stakeholders of the Environmental Audit process
- Provide access to the audit findings
- Obtain comments on compliance and non-compliances
- Ensure transparency in environmental performance reporting
- Comply with legislative and authorisation requirements

3. IDENTIFICATION OF INTERESTED AND AFFECTED PARTIES (I&APs)

The following stakeholders will be included:

- Reviewed list of all registered I&APs from previous environmental processes (list below)

Previous registered I&AP's	
Company/Authority/Estate	Name
Renzke Moore	Village on Sea
Renzke Moore	Paradise Coast Beach and Eco Estate

Charl Wade	South Cape Fire Protection Association
Colin Fordham	Cape Nature
Jessica Christie	Dept Environmental Affairs and Development Planning
Warren Manuel	Mossel Bay Municipality
Waseefa Dhansay	Heritage Western Cape
Andrew September	Heritage Western Cape
Olga van den Pol	EcoAfrica Environmental Consultants
Alwyn Maasz	Pinnacle Point Casino
Dr Peter Nillsen	Point of Human Origins
Zondi Nomfundu	Dept Water and Sanitation

- Adjacent landowners and residents within and surrounding the Pinnacle Point Estate (list below)

Suggested Adjacent landowners	
Name	Estate/Property
Erna Andrews	Village on Sea
Chris Mulder	Village on Sea
Real Estate Developer Renzke Moore	Paradise Coast Beach and Eco Estate
Willie de Beer	Pinnacle Point Casino
General Manager	Fynbos Heights Lifestyle Village

- Relevant authorities, including environmental and heritage bodies (list below)

Relevant Authorities	
Name	Authority
Mr S Kleinhans	Western Cape Department of Environmental Affairs and Development Planning: Region 3

Ms M Koen	Department of Forestry, Fisheries and Environment: Forestry Branch – Western Region
Ms Marlene Laros	Western Cape Department of Environmental Affairs and Development Planning: Coastal Management
Mr Sydney Nkosi	Department Forestry, Fisheries and Environment: Chief Director Protected Areas Systems Management
Ms Thumeka Ntloko	Department Forestry, Fisheries and Environment: Director Protected Areas Systems Management Multilateral Programmes
Mr S Naidoo	Mosselbay Municipal Manager
Mr R Minnie	Assistant Conservation Officer Mosselbay Municipality
Ms S Barnardt	Heritage Western Cape
Mrs M Simons	Cape Nature
Mr Sibonelo Ndlovu	Breede-Olifants Catchment Management Agency (BOCMA)
Mrs N Tshembhani	Breede-Olifants Catchment Management Agency (BOCMA)
Dr Nina Viljoen	Garden Route District Municipality
Dr Peter Nilssen	Human Origins
Mr Charl Wade	South Cape Fire Protection Association
Mr M Jacobs	Department Water and Sanitation Gouritz Water Management Area (important for Garden Route / Mossel Bay area)

- Estate residents and members of the PPHOA

4. PUBLIC PARTICIPATION PROCESS

- All stakeholders as specified under section 3 will be notified in English via email of the 30-day public comment period for the Draft Environmental Audit Report. The notification will include a copy of the report and provide clear instructions on the process and requirements for submitting comments within the stipulated timeframe.
- A site notice in English will be displayed at the entrance to the Pinnacle Point Residential Golf Estate.
- If required by DEADP - An advertisement in English can be published in the local newspaper, the Mossel Bay Advertiser

- If required by DEADP - A hard copy of the Draft Environmental Audit Report will be made available at the Mossel Bay Library for the duration of the 30-day comment period.
- The Draft Environmental Audit Report will also be made available electronically on either the Cimarron Consultant or Pinnacle Point website.

8. COMMENT AND RESPONSE REPORT (CRR)

All comments received will be:

- Recorded in a Comment and Response Report (CRR)
- Responded to by the environmental consultant
- Included in the Final Environmental Audit Report

9. SUBMISSION REQUIREMENTS

The following will be submitted to the competent authority as part of the audit process:

- Final Environmental Audit Report
- Comment and Response Report (CRR)
- Public Participation Report (PPP Report), including:
 - Proof of notification (emails, letters)
 - I&AP database
 - Copies of comments received

10. COMMUNICATION OF OUTCOME

Once a decision is issued:

- All registered I&APs will be notified within 14 days
- Notification will include:
 - Decision outcome
 - Reasons for decision

15. DECLARATION

I, Esca Coetzee in my capacity as the independent Environmental Consultant, hereby confirm that:

- The information provided in this Public Participation Plan is true and correct
- The process will comply with applicable environmental legislation
- All reasonable steps will be taken to ensure meaningful stakeholder engagement

Signature:



Name: Esca Coetzee

Date: 25/03/2026

ANNEXURE A: EXAMPLE OF NOTIFICATION LETTER VIA EMAIL

Subject: Notification of Environmental Audit and Invitation to Comment

Dear Stakeholder,

You are hereby notified of an Environmental Audit being undertaken for the following project:

DEA&DP Reference Number: 16/3/1/5/D6/28/0011/13

Project: Pinnacle Point Residential Golf Resort Development

Location: Mossel Bay, Western Cape

The purpose of the audit is to assess compliance with the Environmental Authorisation and the approved Environmental Management Programme (EMPr).

The development comprises a residential golf estate with associated infrastructure and is currently in its operational phase.

Please find the Draft Environmental Audit Report attached for your review. You are invited to submit written comments within a period of 30 days from the date of this notice. Should you require a hard copy of the report, please contact the undersigned. a Hardcopy of the report will be available at the Mosselbay Library.

Comment period: [Insert Dates]

Submit comments to: esca@cimarroncoaching.co.za

Kindly ensure that all comments are submitted within the specified timeframe.

Yours faithfully,

Esca Coetzee

ANNEXURE B: EXAMPLE OF NEWSPAPER ADVERT (If required)

	Cimarron Consultants (Pty) Ltd	+27 82 875 6800 ✉esca@cimarroncoaching.co.za
NOTICE AND INVITATION TO PARTICIPATE IN THE PUBLIC PARTICIPATION PROCESS FOR THE ENVIRONMENTAL AUDIT REPORT OF PINNACLE POINT RESIDENTIAL GOLF ESTATE DEVELOPMENT. DEADP REF NO: 16/3/1/5/D6/28/0011/13		
Applicant	Pinnacle Point Home Owners Association (PPHOA)	
Consultant	Cimarron Consultants Pty Ltd	
Project Location	Erf 2001 & Erf 3438 Mossel Bay, Western Cape	
Details of application	Notice is hereby given in terms of the National Environmental Management Act (Act No. 107 of 1998) and the Environmental Impact Assessment Regulations, 2014 (as amended), that an Environmental Audit is being undertaken. The Draft Environmental Audit Report is available for public review.	
Opportunity to Participate	Interested and Affected Parties are hereby provided a 30-day period <i>from include date (30 days) to</i> review the report and submit comments by contacting the consultant. The report will be made available electronically upon request. A hard copy is available at the Mosselbay Library	
Contact details	Mrs Esca Coetzee can be contacted on 082 875 6800 or via email esca@cimarroncoaching.co.ca	

ANNEXURE C: EXAMPLE OF NOTICE BOARD

	Cimarron Consultants (Pty) Ltd	+27 82 875 6800 esca@cimarroncoaching.co.za
NOTICE AND INVITATION TO PARTICIPATE IN THE PUBLIC PARTICIPATION PROCESS FOR THE ENVIRONMENTAL AUDIT REPORT OF PINNACLE POINT RESIDENTIAL GOLF ESTATE DEVELOPMENT. DEADP REF NO: 16/3/1/5/D6/28/0011/13		
Applicant	Pinnacle Point Home Owners Association (PPHOA)	
Consultant	Cimarron Consultants Pty Ltd	
Project Location	Erf 2001 & Erf 3438 Mossel Bay, Western Cape	
Details of application	Notice is hereby given in terms of the National Environmental Management Act (Act No. 107 of 1998) and the Environmental Impact Assessment Regulations, 2014 (as amended), that an Environmental Audit is being undertaken. The Draft Environmental Audit Report is available for public review.	
Opportunity to Participate	Interested and Affected Parties are hereby provided a 30-day period <i>from include date (30 days) to</i> review the report and submit comments by contacting the consultant. The report will be made available electronically upon request. A hard copy is available at the Mosselbay Library	
Contact details	Mrs Esca Coetzee can be contacted on 082 875 6800 or via email esca@cimarroncoaching.co.ca	

ANNEXURE D: PREVIOUS NOTIFICATION SENT OUT

Environmental Audit Report 2025: DEADP EA REF NO: 16/3/1/5/D6/28/0011/13 Pinnacle Point Residential Golf Resort Development - Message (HT...

Search

FileMessageHelp

Ignore

Junk

Delete

Archive

Reply

Reply All

Forward

More

Meeting

All Apps

Move

Send to OneNote

Actions

Mark Unread

Categorize

Follow Up

Tags

Find

Related

Select

Editing

Read Aloud

Immersive Reader

Immersive

Translate

Language

Zoom

Zoom

Environmental Audit Report 2025: DEADP EA REF NO: 16/3/1/5/D6/28/0011/13 Pinnacle Point Residential Golf Resort Development

E

esca@cimarroncoaching.co.za

To

elouw@mosselbay.gov.za; status1@status-mark.co.za; scfpa.riversdale@gmail.com; cfordham@capenature.co.za; Jessica.Christie@westerncape.gov.za; wmanuel@mosselbay.gov.za; Waseefa.Dhansay@westerncape.gov.za; Andrew.September@westerncape.gov.za; olga@ecoafrika.co.za; Alwyn.Maasz@tsogosun.com; peter@humanorigins.co.za; ZondiN3@dws.gov.za; DEADPEIAAdmin.George@westerncape.gov.za

Cc

Juditte van Dyk; Carl van der Linde; escacoetzee@gmail.com

You forwarded this message on 13/11/2025 10:39.

Reply

Reply All

Forward

Thu 13/11/2025 10:14

Dear Interested and Affected Parties

HEREWITH NOTIFICATION OF THE SUBMISSION OF THE 2025 ENVIRONMENTAL AUDIT REPORT FOR THE PINNACLE POINT RESIDENTIAL GOLF RESORT DEVELOPMENT, MOSSEL BAY, TO DEA&DP

I hereby notify you of the Pinnacle Point Residential golf resort development 2025 environmental audit report submitted to DEA&DP on 6 November 2025.

The environmental audit report is available and you can request a copy from carlvdl@pinnaclepointestate.co.za

Do not hesitate to contact me for any further queries.

Kind regards

Esca



7 Dikkop str, Eden, George

www.cimarroncoaching.co.za

Esca Coetzee

Environmental Specialist (>20 years experience)

Certified Neuro Coach

Certified Scrum Master (CSM), Professional Scrum Master (PSM I)

Mobile

+27 82 875 6800

Email

esca@cimarroncoaching.co.za

APPENDIX C

**DEADP Acknowledgement and Comment on Public Participation Plan
Ref: 16/3/3/6/5/D6/28/0424/25**

Record of Decision

Environmental Authorisation



REFERENCE: 16/3/3/6/5/D6/28/0424/25
DATE OF ISSUE: 27 May 2026

The General Manager
PINNACLE POINT BEACH AND GOLF RESORT HOMEOWNERS' ASSOCIATION
PO Box 1790
MOSSEL BAY
6500

Attention: Mr. Carl van der Linde

E-mail: carvdl@pinnaclepointestate.co.za

Dear Sir

ACKNOWLEDGEMENT AND COMMENT ON THE PUBLIC PARTICIPATION PLAN: THE EXTERNAL ENVIRONMENTAL AUDIT UNDERTAKEN IN RESPECT OF THE ENVIRONMENTAL AUTHORISATION (REF: EG12/2/1-74-ERF2001& ERF3438) AS AMENDED, FOR THE PINNACLE POINT RESIDENTIAL GOLF RESORT DEVELOPMENT, MOSSEL BAY

1. The Public Participation Plan dated March 2026 ('PP-Plan') regarding the external audit undertaken in respect of the environmental authorisation (Ref: EG12/2/1-74-Erf2001&Erf3438) as amended, for the Pinnacle Point residential golf resort development, prepared by Ms. Esca Coetzee of Cimarron, as received by this Department on 25 March 2026.
2. This letter serves as acknowledgement of the abovementioned document by the Department on 25 March 2026.
3. The Directorate: Development Management (Region 3) ('this Directorate') has reviewed the PP-Plan received on 25 March 2026. According to the plan, the following public participation steps are proposed:
 - 3.1. informing the identified Interested and Affected Parties ('I&APs') via e-mail of the 30-day public comment period on the Draft Environmental Audit Report;
 - 3.2. placement of a site notice in English at the entrance to the Pinnacle Point Residential Golf Estate;
 - 3.3. if required by the Department, an advertisement can be published in the local newspaper i.e. Mossel Bay Advertiser;
 - 3.4. if required by the Department, placement of a hard copy of the Draft Audit Report at the Mossel Bay Library for the duration of the 30-day comment period;
 - 3.5. making the Draft Audit Report available electronically on either the Cimarron website or the Pinnacle Point website.
4. Considering the above, this Directorate agrees to the following public participation steps:
 - 4.1. informing the identified Interested and Affected Parties ('I&APs') via e-mail of the 30-day public comment period on the Draft Environmental Audit Report. Please be advised that where the



Land Management
(Region 3)

REFERENCE: 16/3/15/D6/29/0011/13
ENQUIRIES: Shresh Puler
DATE OF ISSUE: 2015-10-09

The Chairperson
Pinnacle Point Home Owners Association
P.O. Box 1790
MOSEL BAY
6500

Attention: Mr. C. van der Linde

Tel: (044) 606 5000
Email: carvdl@pinnaclepointestate.co.za

Dear Sir

**APPLICATION FOR AMENDMENT OF THE RECORD OF DECISION FOR PINNACLE POINT
RESIDENTIAL GOLF RESORT DEVELOPMENT, MOSSEL BAY**

With reference to your application for the abovementioned, find below the amendment to the "Record of Decision"/Environmental Authorisation with respect to this application.

ADDENDUM TO ENVIRONMENTAL AUTHORISATION

A. DECISION

By virtue of the powers conferred on it by the National Environmental Management Act, 1998 (Act No. 107 of 1998, as amended) and the Environmental Impact Assessment Regulations, 2010 ("NEMA EIA Regulations") the competent authority herewith grants the amendment of the Environmental Authorisation issued on 27 October 2003.

The Environmental Authorisation is amended as set out below:

1. The applicant referred to under section C of the Environmental Authorisation must read as follows:

The Chairperson
Pinnacle Point Home Owners Association
Mr. C. van der Linde
P.O. Box 1790
MOSEL BAY
6500

Tel: (044) 606 5000
Email: carvdl@pinnaclepointestate.co.za
Shresh Puler Building,
93 York Street, George, 6530
Tel: +27 44 505 6600 Fax: +27 44 505 2425

Private Bag 35506, George, 6530
www.environment.gov.za/edc

Verrekening
Reference
Isiphiliso

EG12/2/1-74-ERF 2001 & ERF 3438
PINNACLE POINT GOLF ESTATE (36556)

Akwama
Enquiries
Inqibulo

D ELFORD

Datum
Date
Umhla

29-10-03



*Departement van Omgewingsake en Ontwikkelingsbeplanning
Department of Environmental Affairs and Development Planning
Isibhe leMiclambi yaNdalo esiNgqongileyo noCwangciso loPhuhliso*

Pinnacle Point Resort (Pty) Ltd.
PO Box 26780
HOUT BAY
7872

Attention: Mr I Stratford

Tel: (021) 419-7866
Fax: (021) 419-7867

Dear Sir

**APPLICATION: THE PROPOSED RESIDENTIAL GOLF RESORT DEVELOPMENT
AT PINNACLE POINT, MOSSEL BAY**

With reference to your application, find below the Record of Decision in respect of this application.

RECORD OF DECISION

A. DESCRIPTION OF ACTIVITY:

The construction of the proposed Pinnacle Point Beach and Golf Club development consisting of the following:

- An 18 hole championship golf course with ancillary facilities
- 500 residential units
- 300 hotel rooms in one or more establishments, with
- Conference, sport, health, leisure and entertainment facilities
- Resort management / operational facilities
- Open space and conservation area
- Associated infrastructure.

proximate to the layout plan No. 213501 by Planning Partners, dated 16 August 2003.

A temporary contractor's campsite will be erected where fuel will be stored in aboveground tanks for the duration of the construction phase.

(021) 433-2723
www.dema.gov.za

Ukhawulo, Dorpsstraat 1
Private Bag 29085, Kapstadt 8000

Umthetho, Dorpsstraat 1
Private Bag 29085, Cape Town 8000

Tel/Ab:
Fax/Isi:
Inqanaba:
Hlabathi

Esilinda

APPENDIX D

Minutes of Meeting with Competent Authority



Minutes of meeting

DEADP Pinnacle Point Residential Golf Resort Environmental Audit 2025 Feedback

Date: 17 March 2026

Time: 10:00

Attendees:

Francois Naude	DEA&DP: Development Management (Region 3)
Steve Kleinhans	DEA&DP: Development Management (Region 3)
Carl van der Linde	General Manager: Pinnacle Point Beach and Golf Resort HOA
Esca Coetzee	Cimarron Consultants

1. Formal Completion of the Environmental Audit Process

(Responsibility: Cimarron)

The following steps are required to formally conclude the Environmental Audit process:

1. Update the environmental audit recommendations to reflect agreed management outcomes and associated management actions.
2. Submit the draft (concept) Environmental Audit Report, together with the Public Participation Plan (including public participation already undertaken), to the Department of Environmental Affairs and Development Planning (DEADP) for review and approval.
3. Obtain approval or non-approval from DEADP.
4. Undertake the public participation process in accordance with the approved Public Participation Plan.
5. Incorporate all comments received, together with responses thereto, into the draft Environmental Audit Report.
6. Submit the final Environmental Audit Report, together with the updated Environmental Management Programme (EMPr), to DEADP for acceptance.
7. Receive and consider feedback from DEADP, and implement any further requirements as may be stipulated by the competent authority.

It is recommended that the Environmental Audit process be finalised and accepted by DEADP prior to initiating the application for the inclusion of an expiry date on the Environmental Authorisation.

2. Application for Inclusion of an Expiry Date on the Environmental Authorisation (EA)

(Responsibility: Applicant to appoint independent EAP)

Based on discussions with DEADP, it is highly likely that the application for the inclusion of an expiry date on the Environmental Authorisation will need to be undertaken as a Part 2 Amendment in terms of the Environmental Impact Assessment Regulations, and must be conducted by a registered Environmental Assessment Practitioner (EAP).

The inclusion of an expiry date constitutes a substantive amendment to the Environmental Authorisation, as it alters the duration, applicability, and legal enforceability of the authorisation. As such, the competent authority is required to assess whether adequate environmental management mechanisms will remain in place post-expiry, thereby necessitating a Part 2 Amendment process.

2.1 Key Considerations from DEADP Engagement

1. The development is not yet fully completed, which must be clearly motivated in the application.
2. An expiry period (e.g. 5–10 years) may be considered, potentially linked to demonstrated environmental performance.
3. Mechanisms must be in place to ensure ongoing environmental management during the construction of residential units or further development phases.

2.2 Some of the Key Factors to be addressed in the Part 2 Amendment Application

The following aspects must be clearly motivated and substantiated:

1. The justification for why the Environmental Authorisation does not need to remain in effect indefinitely.
2. The proposed timeframe for the expiry date.
3. The mechanisms to ensure that the environmental duty of care is maintained post-expiry.
4. The existing track record of environmental management on site.
5. The management of all operational aspects, including how compliance will be ensured going forward.

2.3 Supporting Mechanisms and Examples

The application should include evidence of legally binding and institutional mechanisms that will ensure continued environmental protection, such as for example:

1. Registration of nature reserve servitude over sensitive areas, including clearly defined conditions preventing future development.
2. Inclusion of environmental conditions within title deeds.
3. Formal endorsements or ongoing oversight mechanisms involving DEADP and the relevant Municipality.
4. Clear systems for the management of approvals and compliance obligations.

Event: DEA&DP Ref: 16/3/1/5/D6/28/0011/13 – Pinnacle Point meeting regarding the audit and possible amendment application		Date: 17 March 2026		
Protection of Personal Information Act (POPIA) Disclaimer: Please note that your name, organisation and contact details will be included in a formal attendance register and circulated to the meetings attendees after the meeting. All personal information will be handled as required by the Protection of Personal Information Act (Act 4 of 2013).				
Full Name	Organisation / Directorate	Email	Telephone	Signature
Francois Naude	DEA&DP: Development Management (Region 3)	Francois.Naude@westerncape.gov.za	044 814 2011	
Steve Kleinhan	DEA&DP: Development Management (Region 3)	Steve.Kleinhan@westerncape.gov.za	044 814 2022	
Esca Coetzee	Cimarron	esca@cimarroncoaching.co.za	082 875 6800	
Carl van der Linde	General Manager: Pinnacle Point Beach and Golf Resort Homeowners Association	carlvd@pinnaclepointestate.co.za	044 606 5300	

APPENDIX E

Comments and Response Report including evidence of implementation of Public Participation Plan

PINNACLE POINT RESIDENTIAL GOLF RESORT DEVELOPMENT, MOSSEL BAY

COMMENTS AND RESPONSES

DEA&DP Reference No.:

Record of Decision: EG12/2/1-74-Erf2001& Erf3438

Environmental Authorisation: 16/3/1/5/D6/28/0011/13

Acknowledgement and comment on Public

Participation Plan: 16/3/3/6/5/D6/28/0424/25

Prepared For

Pinnacle Point
Home Owners
Association
(PPHOA)

Prepared By

Cimarron Consultants (Pty) Ltd

☎+27 82 875 6800

✉esca@cimarroncoaching.co.za

PROCESS

Public participation was undertaken according to the public participation plan agreed to by the Department of Environmental Affairs and Development Planning (DEA&DP) on 27 May 2026. Interested and Affected Parties (I&APs) were provided with a 30-day comment period from 9 June 2026 to 15 July 2026 to review and comment on the Draft Environmental Audit Report and proposed amendments to the EMPr.

Table 1: Public Participation Process

Action	Detail	Date
Local Newspaper advertisements	Mosselbay Advertiser	5 June Edition
Site Notice (1)	At the entrance of Pinnacle Point Golf Estate Development	2 June 2025
Mossel bay Library	Hard copy available at the Mossel Bay Library	2 June 2025
Letters to neighbours and authorities to register as IAPs and provide issues or comments based on the Draft Environmental Audit Report and notifying them of the availability of the report	✓ Electronic copy available upon request; ✓ Electronic copy available on the Pinnacle Point website under the Estate, Environmental section: https://www.pinnaclepointestate.co.za ✓ Electronic copy available on the consultant's website: https://echohub.co.za/project/draft-environmental-audit-report-pinnacle-point-residential-golf-resort-development-mossel-bay/	2 June 2025
Comment period	60 days	From 9 June 2025 to 15 July 2026

Authorities received notices of the report. The authorities and adjacent landowners consulted or added as a result of the public participation process are stipulated below in table 2

Table 2: Authorities and Adjacent Landowners

Adjacent landowners	
Name	Estate/Property
Erna Andrews	Village on Sea
Chris Mulder	Village on Sea
Renzke Moore	Paradise Coast Beach and Eco Estate- Mosselbay PamGolding
Willie de Beer	Pinnacle Point Casino
General Manager	Fynbos Heights Lifestyle Village

Relevant Authorities	
Name	Authority
Mr S Kleinhans	Western Cape Department of Environmental Affairs and Development Planning: Region 3
Ms M Koen	Department of Forestry, Fisheries and Environment: Forestry Branch – Western Region
Ms Marlene Laros	Western Cape Department of Environmental Affairs and Development Planning: Coastal Management
Mr Sydney Nkosi	Department Forestry, Fisheries and Environment: Chief Director Protected Areas Systems Management
Ms Thumeka Ntloko	Department Forestry, Fisheries and Environment: Director Protected Areas Systems Management Multilateral Programmes
Mr S Naidoo	Director Mosselbay Infrastructure Services
Colin Puren	Mosselbay Municipal Manager
Mr R Minnie	Assistant Conservation Officer Mosselbay Municipality
Ms S Barnardt	Heritage Western Cape
Mrs M Simons	Cape Nature
Mr Sibonelo Ndlovu	Breede-Olifants Catchment Management Agency (BOCMA)
Mrs N Tshembhani	Breede-Olifants Catchment Management Agency (BOCMA)
Dr Nina Viljoen	Garden Route District Municipality
Dr Peter Nilssen	Human Origins
Mr Charl Wade	South Cape Fire Protection Association
Mr M Jacobs	Department Water and Sanitation Gouritz Water Management Area (important for Garden Route / Mossel Bay area)
Mr Brandon Layman	Department of Agriculture: Western Cape Government
Natalie Kendrick	Heritage Western Cape

Table 3: Comments and Responses

Nr	Stakeholder	Comment/Issue	EAP Response to I&AP	Detailed Response to comment	Report Amendment / Location in BAR
1	Me Stephanie Barnardt	3 June 2026 Email from Me Barnardt to Cimarron Consultants: I would like to register as an I&AP	3 June 2026 2026 Email from Cimarron Consultants to Me Barnardt: Acknowledged receipt of the submission	Register as I&AP. Included in I&AP Register	Not applicable
2	Registered Home owner Pinnacle Point Estate Mr Erwin Lehmann	10 June 2026 Email from Mr Lehmann to PPHOA Board: Mr Erwin Lehmann submitted a detailed written submission concerning erosion at Pinnacle Point. The submission raised concerns regarding ongoing erosion between the 6th and 7th holes, alleged non-compliance with the Environmental Authorisation and potential risks to heritage resources and adjacent properties. 18 June 2026 Email from Mr Lehmann to Cimarron Consultants: Mr Lehmann requested that his submission be treated as a formal complaint rather than	18 June 2026 Email Cimarron Consultants to Mr Lehmann: Acknowledged receipt of the submission. The acknowledgement confirmed that the comment had been received, would be included in the public participation process, and would be recorded in the Comments and Responses Report appended to the Final Environmental Audit Report. 1 July 2026 Email Cimarron Consultants to Mr Lehmann: It was confirmed that the erosion concerns and supporting information would be reviewed against the applicable Environmental Authorisation and Environmental Management	Procedural non-compliance finding and Erosion partial compliance finding added to the Final Environmental Audit Report Revision 3_17/07/2026 Procedural non-compliance: No proof provided of registered complaint in Environmental Incident/Complaint register. This demonstrates a non-compliance with the requirements of OEMP Section 4.3 <i>“Maintain a record of environmental incidents as well as corrective and preventative measures taken”</i> Erosion partial compliance: Erosion between 6th and 7th hole, (between Erf 17852 and Erf 17851). The Estate has demonstrated meaningful progress by moving from initial temporary (nature based) stabilisation measures to a professionally engineered long-term	EMPr Section 4.3 and Audit Report Non-compliances/Partial-compliances & Recommendations EA & EMPr Table 10 9L Conservation management programme Section 3.2.3 Erosion and Stormwater Management and Audit Report Non-

Nr	Stakeholder	Comment/Issue	EAP Response to I&AP	Detailed Response to comment	Report Amendment / Location in BAR
		merely a public participation comment. He requested written responses to two questions: Whether the erosion feature would be assessed against the conditions of the EA and EMPr and addressed in the audit report itself, rather than only being appended as a public comment and how the draft audit could conclude that no new impacts were identified when documented evidence of significant erosion exists, including the findings contained in the Ilifa Africa Engineers report dated 2 June 2026. 30 June 2026: Email from Mr Lehmann to Cimarron Consultants: Mr Lehmann followed up, noting that he had not received a response to his questions. He reiterated the two questions and argued that they relate to the integrity of a	Programme, where relevant to the audit scope, to determine whether any updates to the draft findings were required. It was further confirmed that all comments would be considered after the close of the public participation period (15 July 2026) before the report was finalised and submitted to DEADP, with the final report to be circulated to all registered Interested and Affected Parties.	solution, however implementation and rehabilitation remain incomplete. This demonstrates a partial compliance with the requirements of CMP Section 3.2.3 <i>“To respond to all erosion problems as soon as they are identified by identifying the cause of erosion and treating the cause as well as the erosion to repair the damage”</i>	compliances/Partial-compliances & Recommendations EA & EMPR Table 10

Nr	Stakeholder	Comment/Issue	EAP Response to I&AP	Detailed Response to comment	Report Amendment / Location in BAR
		Regulation 34 compliance audit. He requested a response by 7 July 2026, indicating that failing this he would refer the matter to the Environmental Assessment Practitioners Association of South Africa.			
3	Me Melanie Koen	29 June 2026 Email from Me Koen to Cimarron Consultants: Request copies of documents to comment on 13 July 2026 Email from Me Koen to Cimarron Consultants: Comment letter from DFFE (EIA-WC-GR-0024-2026-27). The DFFE emphasised the protection of natural forests and protected trees under the National Forests Act (No. 84 of 1998). They noted the presence of protected trees and coastal forest on the property and requested that greenbelts be maintained as	30 June 2026 Email from Cimarron Consultants to Me Koen: Acknowledged receipt of the submission and Draft Environmental Audit Report sent through to Me Koen 13 July 2026 Email from Cimarron Consultants to Me Koen: The comment was acknowledged and confirmed as having been registered as part of the environmental audit public participation process. It was noted that the issues raised and supporting information would be reviewed and considered against the applicable EA, EMPr and	1. The presence of protected trees and coastal forest on the site is acknowledged and has been assessed in the Environmental Audit Report. 2. Greenbelts are maintained as no-go areas in line with the Operational Environmental Management Programme (EMPR) and Conservation Management Programme (2018). 3. The Pinnacle Point Environmental Manager (Ms. Juditte van Dyk) maintains a good working relationship with DFFE Forestry and will continue to acknowledge the DFFE's mandate under Sections 7 and 15 of the National Forests Act (as noted in the audit under legislative requirements and roles & responsibilities). 4. The PPHOA commits to full ongoing compliance with the National Forests	Section 1.2 Project Description, page 2–3, and relevant EMPR sections on conservation areas EMPR Section 2.5 and Conservation Management Programme Section 3 EMPR Section 5.14 Authorisations,

Nr	Stakeholder	Comment/Issue	EAP Response to I&AP	Detailed Response to comment	Report Amendment / Location in BAR
		no-go areas, continued compliance with licence requirements (Sections 7 & 15), and the opportunity to comment on future development plans. The letter is not a licence and they reserve the right to revise comments. (Letter attached in appendix F)	relevant legislative requirements, where applicable to the scope of the audit. A detailed response would be provided in the final Comments and Responses Report.	Act. No indigenous trees in natural forest or protected trees will be cut, damaged, disturbed, or removed without the necessary licences from DFFE 5. Applications for Section 7 and Section 15 licences will be submitted timeously for any future dwelling developments, once layout plans are approved, the EA remains in force, and all municipal prescriptions are met. 6. The DFFE Forestry Branch will continue to be provided with the opportunity to comment on any future building plans or development proposals that may affect their mandate. This comment has been noted and incorporated into the Final Environmental Audit Report (Revision 3).	Permits and Licences and Section 3.8 National Forests Act
4	Dr M de Villiers	14 July 2026 Email from Dr M de Villiers to Cimarron Consultants: CapeNature expressed general support for the high level of compliance and the audit recommendations. However, they raised specific concerns	14 July 2026 Email from Cimarron Consultants to Dr de Villiers: Acknowledged receipt of the submission	1. Environmental Liaison Committee (Condition 9 of the EA) The ELC was established as a requirement primarily to oversee the construction phase of the development. Following the successful completion of construction and the subsequent disbandment of the ELC, the approved Operational Environmental	EMPr Section 5.1

Nr	Stakeholder	Comment/Issue	EAP Response to I&AP	Detailed Response to comment	Report Amendment / Location in BAR
		regarding: 1. The disbanded Environmental Liaison Committee (Condition 9 of the EA); 2. The unapproved 2019 EMPr revision and lack of subsequent updates; 3. Genetic integrity of introduced Plains Zebra and the need for additional animals in 2026; 4. The absence of a captivity permit for Plains Zebra; 5. Recommendation to phase out extralimital game species; 6. Snake handling practices by security staff.		Management Programme (OEMPr) — as per the DEA&DP approval letter EG12/2/1/74/3865(B) 27 August 2014 — explicitly addresses the transition to operational phase management. Specifically, on page 23 of the approved OEMPr, under section 5 Operational phase environmental management requirements (and subsection 5.1 Annual compliance audit), it states: “In the absence of an Environmental Liaison Committee (ELC) it is the recommendation of this OEMP that an Annual OEMP Compliance Audit be undertaken as a motion to ensure compliance with the OEMP”. This annual independent compliance audit process has been implemented as the primary mechanism for ongoing oversight, stakeholder engagement (where relevant), and ensuring adherence to the OEMP during the operational phase. This Audit Report forms part of this commitment. 2. The need to finalise the 2019: EMPr revision and implement regular updates is acknowledged. This is already captured as a key	

Nr	Stakeholder	Comment/Issue	EAP Response to I&AP	Detailed Response to comment	Report Amendment / Location in BAR
				recommendation in the audit. The PPHOA commits to prioritising the submission of an updated EMPr for approval in 2026. 3. Genetic Integrity of Introduced Wildlife (Plains Zebra): The recommendation to introduce additional unrelated Plains Zebra in 2026 to maintain genetic integrity (EMPr Condition 121) is noted. The PPHOA will investigate and implement this action in consultation with CapeNature. 4. Captivity Permit for Plains Zebra: The PPHOA will submit an application for the necessary captivity permit to CapeNature. 5. Extralimital Game Species: The recommendation to reconsider the keeping of extralimital species and focus on ecotypical species (e.g. Cape Grysbok and Common Duiker) will be considered as part of future game management planning. 6. Snake Handling: The PPHOA takes the incident highlighted in the Facebook video seriously. Relevant security staff will receive accredited snake-handling training as a matter of priority to ensure compliance with	EMPr Section 5.3 Table 10 EMPr Section 5.12 Wildlife Management and Appendix 9J Game Management

Nr	Stakeholder	Comment/Issue	EAP Response to I&AP	Detailed Response to comment	Report Amendment / Location in BAR
				EMPr Condition 134(2) This comment has been noted and incorporated into the Final Environmental Audit Report (Revision 3).	

COMMENTS RECEIVED AFTER THE REVIEW PERIOD

No comments were received after the close of the public review period.

SUMMARY

A total of four (4) comments were received during the public participation process. All comments were considered and responded to in the Comments and Responses Report. Where relevant, the audit report was amended to reflect the comments received and the supporting information submitted.

Annexure A: Register of all I&APs

Title	Initial	Surname	Position	Authority/ Neighbour	Organisation
Mr.	S	Kleinhans	Regional Environmental Officer / Case Officer (Region 3)	Authority	Western Cape Department of Environmental Affairs and Development Planning: Region 3
Ms	M	Koen	Forestry Control Officer / Forestry Official	Authority	Department of Forestry, Fisheries and Environment: Forestry Branch – Western Region
Ms	M	Laros	Coastal Management Officer	Authority	Western Cape Department of Environmental Affairs and Development Planning: Coastal Management
Mr.	S	Nkosi	Chief Director: Protected Areas Systems Management	Authority	Department Forestry, Fisheries and Environment: Chief Director Protected Areas Systems Management
Mrs.	T	Ntloko	Director: Protected Areas Systems Management – Multilateral Programmes	Authority	Department Forestry, Fisheries and Environment: Director Protected Areas Systems Management Multilateral Programmes
Mr.	S	Naidoo	Director: Infrastructure Services	Authority	Mosselbay Municipality
Mr	C	Puren	Municipal Manager	Authority	Mosselbay Municipality
Mr	R	Minnie	Assistant Conservation Officer	Authority	Mosselbay Municipality
Mrs.	S	Barnardt	Specialist Heritage Officer (Archaeology)	Authority	Heritage Western Cape
Dr	M	De Villiers	Landscape Conservation Intelligence Manager - East	Authority	Cape Nature
Mr	S	Ndlovu	Water Use Authorisation / Water Resource Management Official	Authority	Breede-Olifants Catchment Management Agency (BOCMA)
Mrs	N	Tshembhani	Water Resource Management Official	Authority	Breede-Olifants Catchment Management Agency (BOCMA)
Dr	N	Viljoen	Environmental Health Practitioner / Environmental Health	Authority	Garden Route District Municipality

			Services		
Dr	P	Nilssen	Professional Archaeologist / Heritage Specialist	Authority	Human Origins
Mr	C	Wade	Fire Manager / Fire Protection Officer	Authority	South Cape Fire Protection Association
Mr	M	Jacobs	Water Resource Management Official	Authority	Department Water and Sanitation Gouritz Water Management Area (important for Garden Route / Mossel Bay area)
Mr	B	Layman	Agricultural Advisor / Agricultural Resource Management Official	Authority	Department of Agriculture: Western Cape Government
Mrs	N	Kendrick	Heritage Officer / Heritage Practitioner	Authority	Heritage Western Cape
Mrs	E	Andrews	Homeowners Association Representative / Estate Manager	Neighbour	Village on Sea
Mr	C	Mulder	Homeowners Association Representative / Estate Management Representative	Neighbour	Village on Sea
Mrs	R	Moore	Real Estate Developer / Property Development Representative	Neighbour	Paradise Coast Beach and Eco Estate- Mosselbay PamGolding
Mr	W	de Beer	General Manager / Casino Manager	Neighbour	Pinnacle Point Casino
Ms	H	Scherman	General Manager	Neighbour	Fynbos Heights Lifestyle Village
Mr	E	Lehmann	Home Owner Pinnacle Point Estate	Home Owner	Pinnacle Point Estate

Annexure B: Proof of email notification to Stakeholders (Authorities, Neighbours and Home Owners) & Proof of website

NOTICE AND INVITATION TO PARTICIPATE IN THE PUBLIC PARTICIPATION PROCESS FOR THE DRAFT ENVIRONMENTAL AUDIT REPORT Pinnacle Point Residential Golf Estate Development DEA&DP Reference No.: 16/3/1/5/D6/28/0011/13 - Message (HTML)

File Message Help

Ignore Delete Archive Reply Reply All Forward Meeting More

Junk Delete

Archive Team Email Create New

To Manager Reply & Delete

Rules Send to OneNote

Move Actions

Mark Unread Follow Up

Find Related Select

Read Aloud Immersive Reader

Translate

Zoom

NOTICE AND INVITATION TO PARTICIPATE IN THE PUBLIC PARTICIPATION PROCESS FOR THE DRAFT ENVIRONMENTAL AUDIT REPORT Pinnacle Point Residential Golf Estate Development DEA&DP Reference No.: 16/3/1/...

esca@cimarroncoaching.co.za

To 'Esca Coetzee'

Bcc 'mkoen@environment.gov.za'; 'Marlene.Laros@westerncape.gov.za'; 'tntloko@dfre.gov.za'; 'shnkosi@dfre.gov.za'; 'dnaidoo@mosselbay.gov.za'; 'municipalmanager@mosselbay.gov.za'; 'minnie@mosselbay.gov.za'; 'Stephanie.Barnardt@westerncape.gov.za'; 'msimons@capenature.co.za'; 'sndlovu@bocma.co.za'; 'tngobeni@bocma.co.za'; 'nina@gardenroute.gov.za'; 'peter@humanorigins.co.za'; 'scfpa.riversdale@gmail.com'; 'jacobsmd@dws.gov.za'; 'natalie.kendrick@westerncape.gov.za'; 'brandon@elsenburg.com'; 'status11@status-mark.co.za'; 'mulderchris4@gmail.com'; +4 others

Tue 02/06/2026 14:48

Dear Stakeholder,

You are hereby notified, in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") and the Environmental Impact Assessment Regulations, 2014 (as amended), that an Environmental Audit is being undertaken for the Pinnacle Point Residential Golf Estate Development, Mossel Bay, Western Cape (DEA&DP Ref No.: 16/3/1/5/D6/28/0011/13).

The **Draft Environmental Audit Report 2025** has been made available for public review and comment. The purpose of the Environmental Audit is to assess compliance with the Environmental Authorisation and the approved Environmental Management Programme ("EMP"). Stakeholders are hereby invited to review and comment on the Draft Environmental Audit Report and proposed amendments to the EMP during the public comment period from **9 June 2026 to 15 July 2026**.

Written comments and/or requests to register as an Interested and Affected Party (I&AP) must be submitted to:

Esca Coetzee,
Email: esca@cimarroncoaching.co.za
Tel: +27 82 875 6800
Comments must be received no later than **15 July 2026**.

Copies of the Draft Environmental Audit Report are available as follows:

- Electronic copy available upon request.
- Hard copy available at the Mossel Bay Library.
- Electronic copy available on the Pinnacle Point website under the Estate - Environmental section: <https://www.pinnaclepointestate.co.za>
- Electronic copy available on the consultant's website: <https://echohub.co.za/project/draft-environmental-audit-report-pinnacle-point-residential-golf-resort-development-mossel-bay/>

All comments received during the public participation process will be considered and incorporated into the Final Environmental Audit Report to be submitted to DEA&DP.

Yours faithfully,
Esca Coetzee


CIMARRON
7 Dikkop str, Eden, George
www.cimarroncoaching.co.za

Esca Coetzee
Environmental Specialist (>20 years experience)
Certified Neuro Coach
Certified Scrum Master (CSM), Professional Scrum Master (PSM II)

RE: Distribution of Homeowner Notification Email - before 9 June 2026



Michelle Parsons <Michelle@pinnaclepointstate.co.za>
To esca@cimarroncoaching.co.za
Cc 'Esca Coetzee'

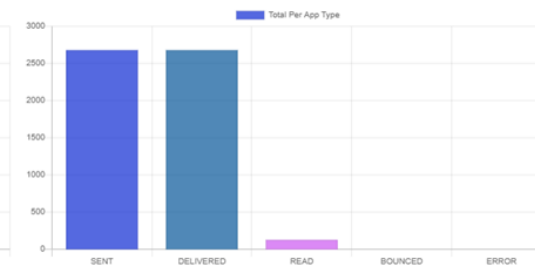
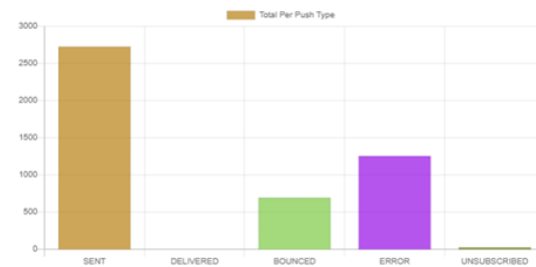
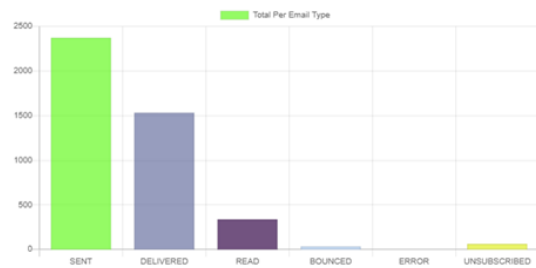
Campaigns

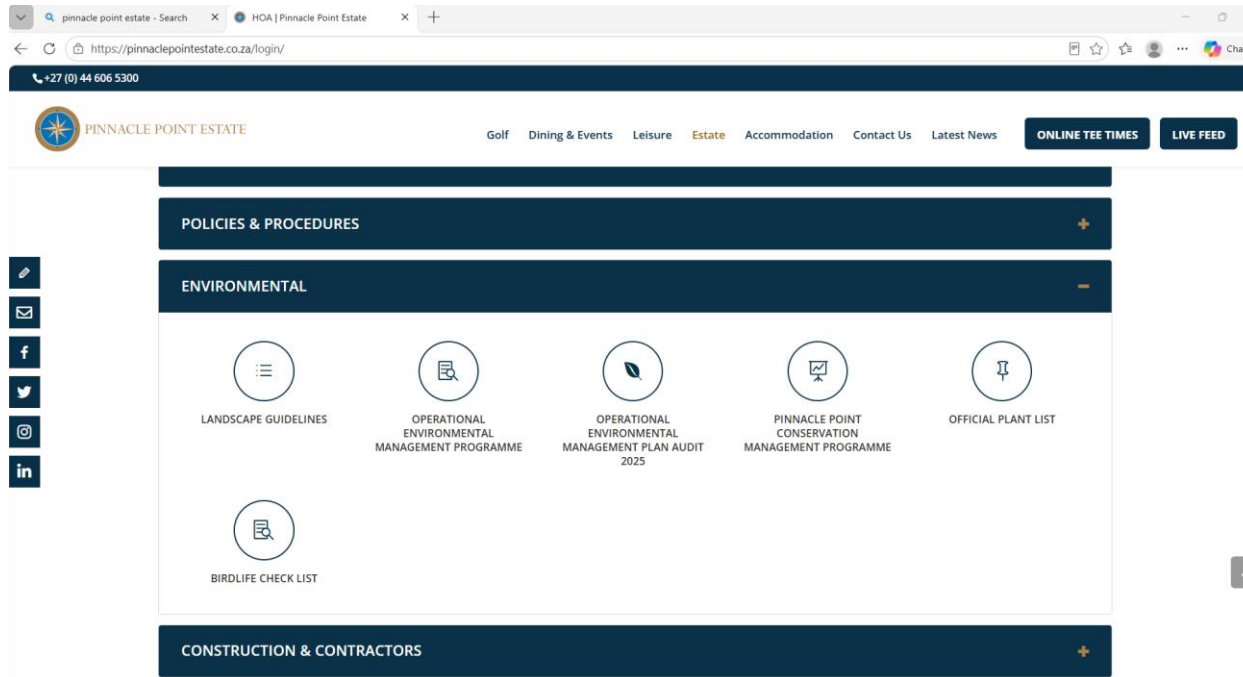
Enter a Date Range
6/2/2026 -

Select Campaign
Public Participation Process for Draft Environmental Au...
Filter

Dashboard

Details





[←](#) [↻](#) [https://echohub.co.za/project/draft-environmental-audit-report-pinnacle-point-residential-golf-resort-development-mossel-bay/](#) [📄](#) [☆](#) [👤](#) [⋮](#) [Chat](#)

Echo

[Home](#) [About PP](#) [How It Works](#) [Companies](#) [Applications](#) [Contact](#) [LOGIN / REGISTER](#)

Key documents

Draft Environmental Audit Report 2025

This report presents the findings of the 2025 annual environmental audit for the Pinnacle Point Residential Golf Resort Development in Mossel Bay, South Africa, conducted by Cimarron (Pty) Ltd on behalf of the Pinnacle Point Home Owners Association (PPHOA). The audit assesses compliance with the Environmental Authorisation (EA, Ref: 16/3/1/5/D6/28/0011/13) originally issued in 2003 and transferred to PPHOA in 2013, as well as the approved Operational Environmental Management Programme Report (EMPR) dated 27 August 2014. The development, now in its operational phase, encompasses an 18-hole golf course, residential units and associated infrastructure on approximately 4.51 km² of land, with ongoing construction limited to 98 remaining dwellings in line with the original site plan

[DOWNLOAD FULL REPORT](#)

[DOWNLOAD FULL REPORT](#)

EN ^

Annexure C: Proof of Site Notification



Annexure D: Proof of Report Available at Mosselbay Library



	Cimarron Consultants (Pty) Ltd	+27 82 875 6800 esca@cimarroncoaching.co.za
NOTICE AND INVITATION TO PARTICIPATE IN THE PUBLIC PARTICIPATION PROCESS FOR THE DRAFT ENVIRONMENTAL AUDIT REPORT OF PINNACLE POINT RESIDENTIAL GOLF ESTATE DEVELOPMENT.		
DEAD REF NO: 16/3/1/5/D6/28/0011/13		
Applicant	Pinnacle Point Home Owners Association (PPHOA)	
Consultant	Cimarron Consultants (Pty) Ltd	
Project Location	Erf 2001 & Erf 3438, 1 Pinnacle Road, Pinnacle Point Residential Golf Estate, Mossel Bay, 6500, Western Cape, South Africa.	
Details of Notice	Notice is hereby given in terms of the National Environmental Management Act (Act No. 107 of 1998) and the Environmental Impact Assessment Regulations, 2014 (as amended), that an Environmental Audit is being undertaken. The Draft Environmental Audit Report is available for public review and comment.	
Opportunity to Participate	Interested and Affected Parties (I&APs) are hereby provided with a 30-day comment period from 9 June 2026 to 15 July 2026 to review and comment on the Draft Environmental Audit Report and proposed amendments to the EMP. Written comments must be submitted to Esca Coetzee at esca@cimarroncoaching.co.za by no later than 15 July 2026. Copies of the report are available as follows: ➤ Electronic copy available upon request; ➤ Hard copy available at the Mossel Bay Library; ➤ Electronic copy available on the Pinnacle Point website under the Estate, Environmental section: http://www.pinnaclepointestate.co.za ➤ Electronic copy available on the consultant's website: https://cimarron.co.za/projects/draft-environmental-audit-report-pinnacle-point-residential-golf-estate-development-mossel-bay/	
Contact details	Mrs Esca Coetzee can be contacted on (+27) 82 875 6800 or via email esca@cimarroncoaching.co.za	

The Draft Environmental Audit Report was delivered at Mossel Bay Library on 2 June 2026 at 9h34.

Accepted by: Xoliswa NGANU
(Signature)

Annexure E: Proof of Advert in Mosselbay Advertiser

14 MOSSSEL BAY ADVERTISER

Vrydag 5 Junie 2026

Mof-Cando against the background of the Marikana informal settlement, where he lives. Photo: Chelsea Pieterse



Mof-Cando releases 10-track Afropop EP

Chelsea Pieterse

Local talent Mof-Cando recently released his EP, complete with 10 tracks, titled *Mphahleku*.

Mof-Cando told *Mossel Bay Advertiser* the EP was six years in the making. He said "Mphahleku" means a community builder, someone on whom the whole village relies, or a shoulder to cry on in isiXhosa.

"It took six years of trying to get to the final product, because a lot has happened along the way. The first project couldn't be dropped because our studio PC crashed. So we had to wait until we could get the studio running again," said Mof-Cando.

Despite this major setback, Mof-Cando dropped the EP on his birthday, 3 May.

"My sound is about real-life music, pain, hustle, growth, and loyalty. It is about changing lives. It should feel like a

conversation every time you listen to it," he said.

When asked if he had a favourite track on the album, he said it was extremely difficult to choose.

"They are all part of my life experience, and to try and understand what others are going through... but if I had to choose, it would be track number three, 'Pressure,'" he said.

"We all go through pressure in life sometimes, but we have to try harder to get to the best outcome, because pressure creates diamonds and gold."

The EP contains Afropop music. You can find out about Mof-Cando and his EP by following him on TikTok and YouTube under the handle @mof-cando, on Instagram at @mof_cando and on Facebook on Mof-Cando, or on the Crystal Blaq Entertainment Facebook page.

Randal Godden: A life well lived and loved

Chelsea Pieterse

Hailed as a fantastic businessman, praised for his mentoring of CEOs, Randal Godden is most remembered by his loved ones as a man with a terrific sense of humour, a great storyteller, a beloved family man and his signature traditional Australian Akubra hats.

Godden's widow, Elsa Krüger, said he was 86 years old when he passed away in May. They had lived happily in Mossel Bay since mid-2020.



Randal Godden and one of his signature Australian Akubra hats.

"The many tributes and messages of love were heartfelt - he was loved and admired."

Born and raised in Australia, Godden met Krüger, a journalist, on a beach in Mauritius in 1987.

"What were the chances of an Afrikaans journalist from Johannesburg and a business executive from Sydney starting to chat on a beach and getting married almost 10 years later? It was clearly meant to be," said Krüger.

Godden loved good wine, music, travel, sport, movies, art, family and friendship. "He was always the first to cry during a sad film, and the first to suggest a dinner party around our table. When he was happy, he sang - loudly and unapologetically - in the shower: Willie Nelson's 'To All the Girls I've Loved Before', or songs from his beloved *Sound of Music*."

"Our life together was rich with travel, celebrations, weddings, adventures, laughter, and, inevitably, seasons of sorrow, too. We faced heartbreaking losses and difficult farewells, but through every chapter, Randal remained a pillar of

strength, wisdom, generosity and grace. He gave so much of himself to others, never expecting anything in return. He truly was one of life's great givers."

Godden's memorial was held on 20 May and live-streamed on YouTube, garnering over 400 views.

His family, friends and former associates from across the globe logged on to say their final goodbyes to him that day and sent poignant messages through to Krüger, mentioning the fond memories they had of him.

Krüger said when the pair met, he had been the CEO of O'Brien in Sydney, Australia, a company specialising in vehicle and building glass; he had also worked as a consultant at Faust Management Corporation in San Diego for three years, before moving to South Africa, where he founded Vistage South Africa. This is where he mentored CEOs and helped many businesses over the years.

"It was his passion, mentoring and helping people," said Krüger. Godden continued to be involved in his mentoring role with clients until recently.

Krüger said he became extremely close with her family; they treated him as a big brother of sorts.

"One of the bonds I will treasure forever is the special friendship he shared with my mother, Nellie," Krüger said her mother had died just 10 weeks before Godden.

Godden's son, Andrew, posted a tribute on Facebook: "The many tributes and messages of love were heartfelt - he was loved and admired and made a positive difference to many. He lived life on his own terms, nearly always wearing his signature Akubra. Thank you to Elsa Krüger and the entire Krüger clan for embracing him, loving him and caring for him."

Godden is survived by Krüger, his son, Andrew, daughter, Vanessa, eight grandchildren and one great-grandchild.



Elsa Krüger and her husband, Randal Godden.



Cimarron Consultants (Pty) Ltd

+27 82 875 6800

esca@cimarroncoaching.co.za

NOTICE AND INVITATION TO PARTICIPATE IN THE PUBLIC PARTICIPATION PROCESS FOR THE DRAFT ENVIRONMENTAL AUDIT REPORT OF PINNACLE POINT RESIDENTIAL GOLF ESTATE DEVELOPMENT.
DEAD REF NO: 16/3/15/D6/28/0011/13

Applicant	Pinnacle Point Home Owners Association (PPHOA)
Consultant	Cimarron Consultants (Pty) Ltd
Project Location	Erf 2001 & Erf 3438, 1 Pinnacle Road, Pinnacle Point Residential Golf Estate, Mossel Bay, 6500, Western Cape, South Africa.
Details of Notice	Notice is hereby given in terms of the National Environmental Management Act (Act No. 107 of 1998) and the Environmental Impact Assessment Regulations, 2014 (as amended), that an Environmental Audit is being undertaken. The Draft Environmental Audit Report is available for public review and comment.
Opportunity to Participate	Interested and Affected Parties (I&APs) are hereby provided with a 30-day comment period from 9 June 2026 to 15 July 2026 to review and comment on the Draft Environmental Audit Report and proposed amendments to the EMP. Written comments must be submitted to Esca Coetzee at esca@cimarroncoaching.co.za by no later than 15 July 2026. Copies of the report are available as follows: - Electronic copy available upon request; - Hard copy available at the Mossel Bay Library; - Electronic copy available on the Pinnacle Point website under the Estate, Environmental section: http://www.pinnaclepointestate.co.za - Electronic copy available on the consultant's website: https://achobus.com/project-detail-environmental-audit-report-pinnacle-point-residential-golf-estate-development-mossel-bay/
Contact details	Mrs Esca Coetzee can be contacted on (+27) 82 875 6800 or via email esca@cimarroncoaching.co.za



Representatives of the Department of Social Development and Sergeant Salomé Marais (back, middle) of the KwaNongqaba Police.

School safety highlighted during police visit

Eighty learners and 25 parents received a visit from the KwaNongqaba Police for a Child Protection Awareness Day held in collaboration with the Department of Social Development (DSD) at Garden Route Primary School in Mossel Bay on

Tuesday 2 June.

School safety, bullying and stranger danger were among the topics discussed. The visit was led by Sergeant Salomé Marais of the KwaNongqaba Police, alongside representatives of the DSD.

Annexure F: Copies of emails and letters received

File

Message

Help

Ignore

Junk

Delete

Archive

Reply

Reply All

Forward

More

Meeting

All Apps

Archive

Team Email

Create New

To Manager

Reply & Delete

Move

Send to OneNote

Actions

Rules

Mark Unread

Follow Up

Find

Related

Select

Read Aloud

Immersive Reader

Translate

Zoom

Delete

Respond

Apps

Quick Steps

Tags

Editing

Immersive

Language

Zoom

RE: NOTICE AND INVITATION TO PARTICIPATE IN THE PUBLIC PARTICIPATION PROCESS FOR THE DRAFT ENVIRONMENTAL AUDIT REPORT Pinnacle Point Residential Golf Estate Development DEA&DP Reference No.: 16/...

S

Stephanie Barnardt <Stephanie.Barnardt@westerncape.gov.za>

To esca@cimarroncoaching.co.za

You replied to this message on 03/06/2026 11:16.

Good day

I would like to register as an I&AP.

Stephanie Barnardt from Heritage Western Cape.

Thanks

Reply

Reply All

Forward

...

Wed 03/06/2026 07:33

RE: NOTICE AND INVITATION TO PARTICIPATE IN THE PUBLIC PARTICIPATION PROCESS FOR THE DRAFT ENVIRONMENTAL AUDIT REPORT Pinnacle Point Residential Golf Estate Development DEA&DP Reference No.: 16/...

E

esca@cimarroncoaching.co.za

To 'Stephanie Barnardt'

Good day Stephanie

Thank you. I will register you as an I&AP. Would you like a copy of the Draft Audit report to review?

Kind regards

Esca

Reply

Reply All

Forward

...

Wed 03/06/2026 11:17

41

From: Erwin Lehmann <erwin@bluequanta.co.za>
Date: 10 June 2026 at 14:42:00 SAST
To: leonr@pinnaclepointestate.co.za, Reina Slomp <reina@pinnaclepointestate.co.za>
Subject: Subject: Erosion at Pinnacle Point — reported to the environmental and heritage authorities

Dear Members of the Board,

I have lodged a formal complaint regarding the active erosion at the estate, the "feature" near the 6th and 7th holes, in correspondence I have seen referred to as the "sinkhole" with the Western Cape Department of Environmental Affairs and Development Planning and Heritage Western Cape, together with the South African Heritage Resources Agency.

The facts seem to be:

1. The erosion was first reported to the PPHOA at least on or about 25 July 2022. Nearly four years on, effective protection works have still not been completed.
2. The condition has worsened materially. The discharge pipes are completely undermined, an earlier sandbag intervention has failed, and the erosion head has retreated to within a few metres of an occupied home.
3. The engineer's report (Wifa Africa Engineers, P25-137-01) records on page 6 that the protection system was reduced to approximately half of its proposed length due to budget constraints, stopping short of the point now failing.
4. The project appears to be fitted to a figure of approximately R500,000. That amount is nowhere to be found in the budget, not in FY2026, not in FY2027, not in the 15-year reserve study, and in nothing the members have approved. It appears to have been conjured out of thin air.
5. The matter is absent from the Draft Environmental Audit Report 2025, which records "no new impacts" and full compliance. As holder of the Environmental Authorisation since 2013, the PPHOA is responsible for compliance with the authorisation and its environmental management programme, including erosion and stormwater.

All of this, of course, does not surprise me. It is consistent with a broader pattern of non-compliance and of matters of this kind not being taken seriously.

The problem has sat unresolved since it was first reported in 2022, and on that record it should be no surprise to you that I have no faith in the Board's will or its ability to resolve it. It therefore falls to others those with the will and the expertise to find a proper solution and, if necessary, to compel the Board to do what it is obliged to do.

This is not only about the risk to one or two dwellings. It concerns the stability of the dune itself, the World Heritage site, and the wider environmental consequences, none of which has been properly assessed. How far the dune will continue to destabilise, and what effect that will have on the surrounding environment and the estate, are questions that must now be answered by people competent to answer them.

The PPHOA, as holder of the Environmental Authorisation, may face penalties for non-compliance. Should the authorities impose any fine or cost that the homeowners are expected to pay, I will apply to court to recover it from those responsible for this situation. The ordinary homeowners should not bear the consequences of what the Board did, or failed to do.

I would also urge the Board to confirm that the PPHOA's directors' and officers' liability insurance and any public liability cover are in place and adequate for an incident of this nature. I raise this as a genuine concern, not to score a point. I would caution, however, that a policy taken out to cover a risk already known to the Board may need to be declared as such to the insurer, failing which the cover may be jeopardised.

Should damage occur to the affected dwellings and I understand that the home at 333 and the neighbouring property to the east are exposed the financial consequences for the PPHOA could be severe. The law provides that directors may be held personally liable, jointly and severally, for loss caused by a breach of their duties or by grossly negligent conduct. Whether the Board's handling of a hazard known since 2022 meets that threshold is not for me to determine that is for a court. But I put the Board on notice that, if the homeowners are made to carry the cost of this, I will pursue legal avenues for recovery from those personally responsible.

I will also share this matter, and what I have found, with the members of the Pinnacle Concerned Homeowners group. Fellow homeowners are entitled to know about it.

Yours faithfully,

Erwin Lehmann

Acknowledgement of Receipt of Comment: Erosion at Pinnacle Point

 esca@cimarroncoaching.co.za
To: 'erwin@bluequanta.co.za'
Cc: 'Esca Coetzee'
Bcc: Carl van der Linde

Dear Mr Lehmann,

Thank you for your submission and for participating in the public participation process for the Pinnacle Point Environmental Audit 2025.

We acknowledge receipt of your comment, which was received by PPHOA and forwarded to Cimarron Consultants for inclusion in the Environmental Audit process.

Your comment will be recorded in the Comments and Responses Report appended to the Final Environmental Audit Report.

Kind regards
Esca Coetzee
Environmental Auditor



CIMARRON
7 Dikkop str, Eden, George
www.cimarroncoaching.co.za

Esca Coetzee
Environmental Specialist (>20 years experience)
Certified Neuro Coach
Certified Scrum Master (CSM), Professional Scrum Master (PSM I)

Mobile +27 82 875 6800
Email escacoetzee@gmail.com

 Reply  Reply All  Forward 

Thu 18/06/2026 11:53

Re: Acknowledgement of Receipt of Comment: Erosion at Pinnacle Point

 Erwin Lehmann <erwin@bluequanta.co.za>
To: esca@cimarroncoaching.co.za
Cc: Esca Coetzee

 You forwarded this message on 18/06/2026 13:59.

 image002.jpg 4 KB

 Reply  Reply All  Forward 

Thu 18/06/2026 12:28

Dear Ms Coetzee

Thank you for your acknowledgement.

I must, however, raise a question about the characterisation it records. My submission of 10 June 2026 was not, as I intended it, a comment offered in a public participation process. It was a complaint. It alleged a specific, known and material failure: a substantial erosion feature in the dune system adjacent to occupied dwellings at Pinnacle Point, first reported to the Association on 25 July 2022, which the draft Environmental Audit Report does not address while certifying that no new impacts were identified and that the management programme remains adequate and effective.

My concern is that logging the complaint as a comment to be appended to a Comments and Responses Report does not answer it. May I ask that it be recorded and dealt with as a complaint?

As I understand it, the audit is a compliance audit conducted under Regulation 34 of the Environmental Impact Assessment Regulations, and the environmental authorisation (reference 16/3/1/5/D6/28/0011/13) was transferred to the Association in 2013, so that the Association is responsible for compliance with it and with the environmental management programme. Is the independent auditor in such an audit not required to identify and report shortcomings in compliance rather than omit them?

The erosion feature is documented in the Ilifa Africa Engineers report (P25-137-01, 2 June 2026), which records significant erosion within the dune system, deep gullies, loss of vegetation, slope instability and ongoing soil displacement. How does that finding sit alongside an audit conclusion that no new impacts were identified? I would be grateful for your explanation.

In the circumstances I would be grateful if you could confirm in writing:

1. whether the erosion feature will be assessed against the conditions of the environmental authorisation and the environmental management programme and addressed in the audit report itself, rather than only appended as a comment; and
2. how the audit can certify that no new impacts were identified when a documented erosion feature of this nature exists and was known to the Association.

For the record, the matter has also been raised with the competent environmental and heritage authorities, as my email of 10 June indicated.

I look forward to your reply.

Erwin Lehmann

Re: Acknowledgement of Receipt of Comment: Erosion at Pinnacle Point

 Erwin Lehmann <erwin@bluequanta.co.za>
To: esca@cimarroncoaching.co.za
Cc: STEVE COMBE; Caresa Combe

 image002.jpg 4 KB

 Reply  Reply All  Forward 

Tue 30/06/2026 15:16

Dear Ms Coetzee

I refer to my email of 18 June 2026, which followed your acknowledgement of the same date. I have had no response and am following up.

In that email I asked that my submission of 10 June 2026 be recorded and dealt with as a complaint rather than logged as a public participation comment, and I put two questions to you in writing. Neither has been answered.

To restate them:

1. Whether the erosion feature will be assessed against the conditions of the environmental authorisation and the environmental management programme and addressed in the audit report itself, rather than only appended as a comment.
2. How the audit can certify that no new impacts were identified when a documented erosion feature of this nature exists, was first reported to the Association on 25 July 2022, and is recorded in the Ilifa Africa Engineers report P25-137-01 dated 2 June 2026, which describes significant erosion within the dune system, deep gullies, loss of vegetation, slope instability and ongoing soil displacement.

These go to the integrity of a compliance audit conducted under Regulation 34 of the EIA Regulations. Is An independent auditor not required to identify and report shortcomings in compliance, not to omit them?

I require a response by 7 July 2026, failing which I will refer the matter to the Environmental Assessment Practitioners Association of South Africa.

Regards

Erwin Lehmann

Response to Follow-Up Regarding Environmental Audit Process



esca@cimarroncoaching.co.za
To: 'Ervin Lehmann'
Cc: 'STEVE COMBE'; 'Caresa Combe'
Bcc: Carl van der Linde

[Reply](#) [Reply All](#) [Forward](#) [...](#)

Wed 01/07/2026 12:01

Dear Mr Lehmann,

Thank you for your email and for following up.

Your submission of 10 June 2026 has been recorded and is being considered as part of the environmental audit process. The public participation period remains open until 15 July 2026.

Regarding your questions:

1. The matters raised regarding the erosion feature will be considered against the applicable Environmental Authorisation and Environmental Management Programme requirements, where relevant to the scope of the environmental audit. Any resulting findings will be reflected in the final audit report.
2. The statement in the draft report reflects the information available and assessed at the time of the audit (October 2025). Your submission and supporting information received during public participation are being reviewed and will be considered in determining whether updates to the draft findings are required.

Following closure of the public participation period on 15 July 2026, all comments and available information will be reviewed before the report is finalised.

Once finalised, the report will be submitted to DEADP and circulated to all I&APs in accordance with the process requirements.

Kind regards,

Esca Coetzee

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RE: NOTICE AND INVITATION TO PARTICIPATE IN THE PUBLIC PARTICIPATION PROCESS FOR THE DRAFT ENVIRONMENTAL AUDIT REPORT Pinnacle Point Residential Golf Estate Development DEA&DP Reference No.: 16/3/1/5/D6/28/0011/13 - Message (HTML)

escacoetzee@gmail.com

To: Melanie Koen; esca@cimarroncoaching.co.za

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Tue 30/06/2026 09:54

Pinnacle Point Home Owners Association Draft Environmental Audit Report 2025.pdf 5 MB

Good day Me Koen

Please find attached the draft Environmental Audit report for your comments. Apologies for not seeing your request on the 2nd of June below.

Much appreciated

Kind regards

Esca

From: Melanie Koen <Mkoen@dfle.gov.za>

Sent: 29 June 2026 02:29

To: esca@cimarroncoaching.co.za; escacoetzee@gmail.com

Subject: FW: NOTICE AND INVITATION TO PARTICIPATE IN THE PUBLIC PARTICIPATION PROCESS FOR THE DRAFT ENVIRONMENTAL AUDIT REPORT Pinnacle Point Residential Golf Estate Development DEA&DP Reference No.: 16/3/1/5/D6/28/0011/13

Dear Sir/ Madam- Hope this email finds you well. May you kindly provide me with the copies of the documents to comment on please? Kind regards

From: Melanie Koen

Sent: Tuesday, June 2, 2026 3:30 PM

To: esca@cimarroncoaching.co.za

Subject: FW: NOTICE AND INVITATION TO PARTICIPATE IN THE PUBLIC PARTICIPATION PROCESS FOR THE DRAFT ENVIRONMENTAL AUDIT REPORT Pinnacle Point Residential Golf Estate Development DEA&DP Reference No.: 16/3/1/5/D6/28/0011/13

Dear Sir/ Madam- Hope this email finds you well. May you kindly provide me with the copies of the documents to comment on please? Kind regards

From: esca@cimarroncoaching.co.za

Sent: Tuesday, June 2, 2026 2:48 PM

To: escacoetzee@gmail.com

Subject: NOTICE AND INVITATION TO PARTICIPATE IN THE PUBLIC PARTICIPATION PROCESS FOR THE DRAFT ENVIRONMENTAL AUDIT REPORT Pinnacle Point Residential Golf Estate Development DEA&DP Reference No.: 16/3/1/5/D6/28/0011/13

You don't often get email from esca@cimarroncoaching.co.za. Learn why this is important

Dear Stakeholder,

You are hereby notified, in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") and the Environmental Impact Assessment Regulations, 2014 (as amended), that an Environmental Audit is being undertaken for the Pinnacle Point Residential Golf Estate Development, Mossel Bay, Western Cape (DEA&DP Ref No.: 16/3/1/5/D6/28/0011/13).

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Melanie Koen <Mkoen@dfle.gov.za>

To: esca@cimarroncoaching.co.za

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Mon 13/07/2026 09:51

You replied to this message on 13/07/2026 15:14.

EIA-WC-GR-0024-2026-27.pdf 383 KB

Dear Ms. Coetzee- Hope this email finds you well. Attached please find comment. Please confirm receipt. Kind regards

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esca@cimarroncoaching.co.za

To 'Melanie Koen'

Cc 'escacoetzee@gmail.com'

Reply

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...

Mon 13/07/2026 15:15

Good day Ms Koen.

Thank you for your submission. Your comment has been received and registered as part of the environmental audit public participation process. The issues raised, together with any supporting information provided, will be reviewed and considered against the applicable Environmental Authorisation, Environmental Management Programme and relevant legislative requirements, where applicable to the scope of the audit. A response will be included in the final Comments and Responses Report.

Much appreciated
Kind regards
Esca



CIMARRON

7 Dikkop str, Eden, George

www.cimarroncoaching.co.za

Esca Coetzee

Environmental Specialist (>20 years experience)

Certified Neuro Coach

Certified Scrum Master (CSM), Professional Scrum Master (PSM I)

Mobile

+27 82 875 6800

Email

escacoetzee@gmail.com



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Demar Centre, Main Road, Knysna, WC, Contact Number: 066 374 7795
Enquiries: TF Gwala, E-mail: TGwala@offe.gov.za

EIA-WC-GR-0024-2026-27

RE: COMMENT ON THE DRAFT ENVIRONMENTAL AUDIT REPORT FOR PINNACLE POINT GOLF ESTATE A PORTION OF REMAINDER ERF 2001 AND ERF 3438, MOSSEL BAY

DATE: 7 July 2026

Cimarron Consultants (Pty) Ltd
Attention: E. Coetzee
Email: esca@cimarroncoaching.co.za
Cell/ Tel: -

Dear Sir/ Madam

I refer to your e-mail notification of 30 June 2026 with documents.

Please receive comments from the Branch: Forestry Management, Directorate: Forest Resource Protection in the Department of Forestry, Fisheries and the Environment (DFFE) on the above-mentioned proposed Draft Environmental Audit report.

The mandate of the Forestry Branch in the Department of Forestry, Fisheries and the Environment (DFFE), as a commenting authority, is to ensure control over developments that affect State forests, natural forests, forest nature reserves and protected trees.

1. The applicant must assess and quantify the anticipated impacts on the indigenous forests. The National Forests Act of 1998 (as amended) provides the strongest and most comprehensive legislation and mandate for the protection of all natural forests in South Africa. The principles of the Act in Section 3 state clearly that "...natural forests may not be destroyed save in exceptional circumstances where, in the opinion of the Minister, a proposed new land use is preferable in terms of its economic, social or environmental benefits".

2. Section 7 of the National Forest Act (NFA), act no 84 of 1998 as amended provides for the prohibition of the destruction of indigenous trees in any natural forest without a license. Under section 62 (1) of the NFA any person who contravenes the prohibition of certain acts in relation to trees in natural forests referred to in Section 7 (1) is guilty of a second category offence. A person who is guilty of a second category offence may be sentenced on a first conviction for that offence to a fine or imprisonment for a period of up to two years, or to both a fine and such imprisonment. Section 15 of the NFA, prohibits the destruction of protected trees without a license: "No person may cut, damage, destroy or remove any protected tree; or collect, remove, transport, export, purchase, sell donate or in any other manner acquire or dispose of any protected tree....." Anyone contravening this prohibition, is guilty of a first category offence, and can be sentenced to up to 3 years imprisonment, or a fine, or both.

3. Section 7 of the Act prohibits the cutting, disturbance, destruction or removal of any indigenous living or dead tree in a forest without a licence, while Section 15 places a similar prohibition on protected tree species listed under the Act, some of which are also forest species.



Be the change you want to see

The processing of personal information by the Department of Forestry, Fisheries and the Environment is done lawfully and not excessive to the purposes of processing in compliance with the POPI Act, any codes of conduct issued by the Information Regulator in terms of the POPI Act and / or relevant legislation providing appropriate security safeguards for the processing of personal information of others.

4. Cutting or disturbing an indigenous tree in a natural forest without a valid Forest Act Licence is a criminal offence and a transgression of the National Forests Act, 1998 (Act No. 84 of 1998) and carries a fine or imprisonment or both.

5. Indigenous trees with active bird nests or other significant biodiversity features may not be destroyed without a valid Fauna Permit from the provincial conservation authority, the Western Cape Department of Agriculture, Environmental Affairs, Rural Development and Land Reform ("DAERL"), if these would be affected.

DDFE studied the supporting documents for the above-mentioned Draft Environmental Audit report and the following points related to Forestry's mandate i.e. the implementation of the NFA are applicable

6. According to the information provided: "According to the report: "Pinnacle Point Residential Golf Resort Development, Mossel Bay is made up of privately owned and municipal land situated on a Portion of Remainder Erf 2001 and Erf 3438 immediately west of Mossel Bay in the Southern Cape. The site is located adjacent and to the south of the Pinnacle Point Casino (Garden Route Casino), approximately 6km west of the Mossel Bay central business district (CBD), between the townships of Mossel Bay and Dana Bay, along the Indian Ocean. The site is approximately 4.51 km² in extent with a coastline frontage of approximately 3,8km. The EA permitted the development of an 18 hole championship golf course with ancillary facilities, 500 residential units, a 300 hotel rooms in one or more establishments, with conference, sport, health, leisure and entertainment facilities, resort management / operational facilities, open space and conservation areas, including the associated infrastructure. It also permitted a temporary contractor's campsite to be erected where fuel was stored in aboveground tanks for the duration of the construction phase. Property measuring $\pm$ 118.3ha." Protected trees as well as coastal forest occurs on this property.



Forestry has the following comments:

- i. Forestry has a co-operative governance relationship with various Authorities as well as stakeholders, and thus will take their concerns into consideration if such should arise
- ii. Forestry request the following:
 1. That Greenbelts be kept intact as no-go areas
 2. Forestry has a good working relationship with the Pinnacle Point Environmental Manager (Ms. Van Dyk), whereby Forestry is acknowledged when their mandate according to Section 7 & 15 of the NFA is affected
 3. Forestry requests the continued comments opportunity on any future proposed building plans or development proposals where its mandate is affected.
 4. Forestry requests the continued compliance in terms of timeously applying for Section 7/ Section 15 licences under the NFA should it be required for proposed future dwelling developments. Forestry may only issue such a licence with conditions under the NFA for the pruning of protected/ indigenous trees overhanging/ falling within the footprint of the proposed development, once layout is approved, EA is approved as well as all

Batho pele- putting people first

Municipal prescriptions are met. Applicant to comply with all Environmental Laws as well as Municipal prescriptions

- iii. Kindly note that this letter is not a NFA licence
- iv. Section 15 of the National Forest Act (NFA) (Act No. 84 of 1998) as amended prohibits the cutting, disturbing, damaging or destroying of protected tree species without a licence. Section 7 of the National Forest Act (NFA), act no 84 of 1998 as amended provides for the prohibition of the destruction of indigenous trees in any natural forest without a license.

Note: The Department reserves the right to revise the initial comment based on any additional information that may be received

Should you wish to correspond further on this matter, quote Reference EIA-WC-GR-0024-2026-27. Enquiries may be directed to Ms. TF Gwala at TGwala@dfre.gov.za, Cell 066 374 7795.

Yours Faithfully,



SIGNATURE OF DELEGATED AUTHORITY
Department of Forestry, Fisheries and the Environment
Letter signed by: Ms. TF Gwala
Designation: Deputy Director Forest Resource Protection
Branch: Forestry Management



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Re: NOTICE AND INVITATION TO PARTICIPATE IN THE PUBLIC PARTICIPATION PROCESS FOR THE DRAFT ENVIRONMENTAL AUDIT REPORT Pinnacle Point Residential Golf Estate Development DEA&DP Reference No.: 16/...

MD

Marianne De Villiers <mdevilliers@capenature.co.za>
To: esca@cimaroncoaching.co.za; escacotzee@gmail.com
Cc: Carlo Van Tonder; Wayne Meyer
You replied to this message on 15/07/2026 10:07.
Pinnacle-PT-Estate_Audit-Report_20260714_CapeNature.pdf 251 KB

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Tue 14/07/2026 14:44

Dear Esca,

Thank you for the opportunity to comment on the audit report; please see attached commenting letter.

Please note that Megan is no longer with CapeNature. Priority land use related issues can be brought to my attention until the Land Use Scientist vacancy has been filled.

Kind regards

Marianne de Villiers

Landscape Conservation Intelligence Manager - East

CapeNature

tel 0870876085 | cell 0827293419
email mdevilliers@capenature.co.za
postal Private Bag 1058 Oudthoorn 6620
physical Queens Hotel Bldg, Baron van Reede Street, Oudthoorn, 6620
www.capenature.co.za

Marianne De Villiers

Landscape Capabilities Intelligence Manager - East | Biodiversity Conservation
Conservation Operations
t: 087 087 6085

CapeNature

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Re: NOTICE AND INVITATION TO PARTICIPATE IN THE PUBLIC PARTICIPATION PROCESS FOR THE DRAFT ENVIRONMENTAL AUDIT REPORT Pinnacle Point Residential Golf Estate Development DEA&DP Reference No.: 16/...

E

esca@cimaroncoaching.co.za
To: 'Marianne De Villiers'; 'escacotzee@gmail.com'
Cc: 'Carlo Van Tonder'; 'Wayne Meyer'; Carl van der Linde; 'escacotzee@gmail.com'

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Wed 15/07/2026 10:07

Good day Me De Villiers

Thank you for your submission. Your comment has been received and registered as part of the environmental audit public participation process. The issues raised, together with any supporting information provided, will be reviewed and considered against the applicable Environmental Authorisation, Environmental Management Programme and relevant legislative requirements, where applicable to the scope of the audit. A response will be included in the final Comments and Responses Report.

Much appreciated

Kind regards

Esca

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RE: NOTICE AND INVITATION TO PARTICIPATE IN THE PUBLIC PARTICIPATION PROCESS FOR THE DRAFT ENVIRONMENTAL AUDIT REPORT Pinnacle Point Residential Golf Estate Development DEA&DP Reference No.: 16/...

MD

Marienne De Villiers <mdevilliers@capenature.co.za>
To: esca@immarcoaching.co.za, escacottzee@gmail.com
Cc: Carlo Van Tonder, Wayne Meyer, Carl van der Linde, escacottzee@gmail.com

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...

Wed 15/07/2026 10:29

Dear Esca,

Thank you very much for the feedback and for outlining the way forward.

Kind regards,
Marienne

Marienne De Villiers
Landscape Capabilities Intelligence Manager - East | Biodiversity Conservation
Conservation Operations
t: 087 087 6985



51



CONSERVATION INTELLIGENCE:
LANDSCAPE EAST

physical 4th Floor, York Park Building, York Street,
George, 6530
website www.capenature.co.za
enquiries Marienne de Villiers
telephone 087 087 6085
email mdevilliers@capenature.co.za
reference LE14/2/6/1/6/6/Pinnacle-Pt-Estate_Audit-report
date 14 July 2026

Esca Coetzee
Cimarron (Pty) Ltd
7 Dikkop Street
Eden
George
6529

By email: esca@cimarroncoaching.co.za

Dear Ms Coetzee

**DRAFT ENVIRONMENTAL AUDIT REPORT Pinnacle Point Residential Golf Estate
Development, Mossel Bay, Western Cape Province**

DEA&DP Reference: 16/31115/D6/28/0011113

CapeNature would like to thank you for the opportunity to comment on the above report. Please note that our comments below only pertain to biodiversity related impacts.

1. CapeNature is pleased to see the high overall compliance with the Environmental Management Programme.
2. We support the audit report recommendations to focus on addressing non-compliances, to revisit the EMPr amendment process, to enhance documentation, and to improve procedural measures.
3. CapeNature is concerned that the disbanded Environmental Liaison Committee has not been re-established per Condition 9 of the Environmental Authorization. This should be rectified without delay.
4. CapeNature is also concerned that the 2019 revision of the EMPr was not approved and that there have been no subsequent revisions of this document. It is strongly recommended that the EMPr is updated and approved in 2026.
5. According to Condition 121 of the EMPr, genetic integrity of introduced wildlife must be maintained by the introduction of additional, unrelated animals of each species every five to seven years. There is no indication that this has been achieved for the introduced Plains Zebra *Equus quagga burchellii* and it is recommended that additional animals are introduced in 2026.
6. Pinnacle Point Golf Estate is not in possession of captivity permit for Plains Zebra and it is recommended that an application is submitted to CapeNature for such a permit without delay.

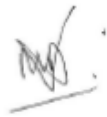
The Western Cape Nature Conservation Board trading as CapeNature

Board Members: Mr Tom Blok, Ms Reyhana Ganji, Dr Colin Johnson, Ms Ayanda Mvundaba, Prof Niolaas Olivier, Ms Chwayita Shude-Mareka, Dr Razeena Omar

7. It is strongly recommended that the keeping of extralimital game species is reconsidered and that a focus is instead placed on maintaining habitat for ecotypical species that occur naturally on the property, e.g. Cape Grysbok *Raphicerus melanotis* and Common Duiker *Sylvicapra grimmia*.
8. EMPr Condition 134 (2) states that problem snakes should be caught by Estate Security and released in the conservation area. A complaint was received by CapeNature this year with a link to a Facebook video where a Pinnacle Point Security Guard is shown capturing a snake on Pinnacle Point in a manner which is likely to have been harmful to the snake. It is recommended that the relevant security guards receive initial or refresher accredited snake handling training.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Kind regards



(Dr) Marienne de Villiers

Manager, East Landscape Conservation Intelligence Unit

The Western Cape Nature Conservation Board trading as CapeNature

Board Members: Mr Tom Blok, Ms Reyhana Gani, Dr Collin Johnson, Ms Ayanda Mvndaba, Prof Nicolaas Olivier, Ms Chwayita Shude-Mareka, Dr Razeena Omar