



Desirée du Preez

Professional Environmental Practitioner Pri Sci Nat

17 Mountain Road George 6529 Tel 044-8740682 Fax 0865107015 desdup@telkomsa.net

Audit Report

Pinnacle Point Beach and Golf Estate

**Operational Environmental Management Plan
Audit**

October 2018

Qualifications of the auditor

BSc Forestry (Nature Conservation) US

MPhil Environmental Science UCT

ISO Management System Audit Techniques and Best Practices Online Course with Alison

10 years' experience in nature conservation and nature reserve planning and ecological management.

17 years' experience in environmental assessment and planning

Involved in environmental planning for the following golf estates: Arabella Country Estate, Fernkloof Golf Estate; Atlantic Beach Golf Estate

Declaration of Independence

I, Desireé du Preez am in no way financially or otherwise involved with or connected to the Pinnacle Point Estate or any person working or living in the Estate, apart from undertaking professional service for remuneration as and when appointed by the Homeowners' Association.

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1. Introduction

Implementation of Pinnacle Point Beach and Golf Estate Operational Environmental Management Plan (OEMP) was audited in 2015. In 2016 the ECO passed away, leaving management in a predicament regarding conservation management. Permission was hence requested from the Department of Environmental Affairs to postpone this annual audit.

In 2017 revision of the OEMP was undertaken according to the requirement for updating every 2 years from approval. The revision incorporated the comments from the 2015 audit as well as the preparation of the Conservation Areas Management Plan as is required within 12 months of approval of the OEMP. The revised OEMP and Conservation Areas Management Plan has not yet been approved, since legal requirements in the 2014 regulations of the National Environmental Management Act (Act 107 Of 1998) were not met and the need for a management plan focussing on the golf course was identified.

This audit is therefore the second audit for implementation of the OEMP that was approved in August 2014.

2. Terms of Reference

The environmental audit for Pinnacle Point Estate was commissioned to audit the implementation of the approved OEMP, which specifies measures to implement mitigation required for the Environmental Authorisation. The scope audit is therefore limited to the study area of the OEMP.

The terms of reference for the audit is contained within the OEMP, and are as follows:

The main purpose of the Annual OEMP compliance audit which must be submitted to the PPHOA must be to:

- *Highlight areas where improvements may be necessary alongside and implementation schedule for implementing such improvements;*
- *Non-compliance with the OEMP or EA must be reported with the necessary actions to rectify such non-compliance.*
- *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*

In addition to these terms of reference, the specific terms of reference for this audit was to focus on golf course management, which was not dealt with in detail in the previous audit, to identify gaps in the OEMP, to check that the ECO is knowledgeable of the OEMP requirements and has the necessary authority to implement the specifications.

The OEMP requirements that are addressed and implemented through PPHOA house rules, stormwater guidelines, landscaping guidelines, architectural code and the builders' agreement were not audited, as these were covered in the previous audit and requirements were found to be implemented strictly and diligently.

3. Findings of the Audit

The audit found that the ECO is adequately knowledgeable of the OEMP and its requirements and has authority and the budget to implement these requirements. The OEMP, which has been implemented for four years, is showing inadequacies that either led to non compliance or failure to meet the aims of environmental management of the Estate.

The findings of the audit are grouped in 4 categories:

- Organisational related Non Compliance issues
- OEMP wording related Non compliance issues.
- Issues that were found to be insufficiently managed or not addressed
- Shortcomings of the current OEMP

Most of the non compliance findings would be corrected by review of the OEMP and developing of a Conservation Areas Management Plan to reflect the current practicalities and guide the ECO and Estate Management. Many of the golf course related issues may well be addressed in an EMP specific for the golf course, as a part of the main OEMP. This would be more practical for the greenkeeper while preventing the OEMP from becoming a cumbersome document.

The findings, discussed in more detail with their corrective actions are discussed below.

1. Organisational related Non Compliance issues

Several non compliance issues were found that are related to organisational or property issues or changes and have no direct implications on environmental management of the Estate. These are:

- a. 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.

Correction action required: 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.

- b. The following issue raised a non compliance finding for the second time:

“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”.

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.

Correction action required: Review of the OEMP is required to address this issue.

- c. *“The ECO is responsible to ensure implementation of the ACMP”*

It was found that the ECO has no knowledge of or authority for implementation of the ACMP.

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.

2. OEMP wording related Non compliance issues.

Two clauses in the OEMP were found to inaccurately address the practice on the Estate and warrant revision, as the specifications are not written to accommodate the practical reality.

- a. *“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”*

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.

Correction action required: Review of the OEMP is required to address this issue and avoid future non compliance findings.

3. “Issues that were found to be insufficiently managed or not addressed are the following

- a. *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.

- b. *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.

Correction action required: Provide environmental awareness training for golf course management.

- c. *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*

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.

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.

- d. *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.

- e. *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.*

Correction action required: 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.

- f. *The Conservation Trust must ensure that an annual assessment/audit of overall game management is undertaken by a suitably informed expert.*

Correction action required: This function must be taken over by either the ECO or general manager. Implement an audit of the overall game management.

- g. *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.

- h. *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.

- i. *St Blaize trail markers*

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 a 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.

4. Shortcomings of the current OEMP

Many specifications are implemented as specified in the OEMP, but the ECO or Estate Management has identified problems or shortcomings with these specifications. There are also issues that were never addressed in the OEMP, which should be addressed to meet the objectives of environmental management of the Estate.

a. *St Blaize trail issues*

A trail management issue that has arisen is that people sign in at security when entering the Estate, but then leave for home from the club house without notifying anyone. Amend the OEMP to specify that people must be informed to notify security if they intend leaving from the club house, either upon entering the Estate, or at the club house. Train security staff to inform the public and handle it correctly.

b. *Golf cart paths*

Short cuts taken by golf carts are found in some open space areas. These need to be addressed by:

- Review of the cart path system to identify shortcomings or additional parking needs. Address the issue in the OEMP, preferably a golf course EMP.
- Do induction training to golf course staff to make them aware of the requirements for out of play areas.

c. *Management of turf (kikuyu grass) to ensure that it does not encroach into remaining natural areas surrounding the golf course.*

An OEMP specification is needed to implement a method to clean golfer's shoes before entering the golf course and possibly also to clean maintenance machines and mowers when kikuyu patches were cut.

d. *Quality control for irrigation water (treated effluent);*

The treated effluent with which the golf course is irrigated has a high pH and salt content. Find solutions to treat the water and specify it in the OEMP.

e. *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.*

The landscape manager and greenkeeper do regular visual monitoring. However, visual monitoring will not provide data. It will not indicate change in species composition. It only notices rapid growth and the need for pruning. Revise the OEMP specification to meet the objectives of the monitoring

f. *The Construction Environmental Management Plan 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.

The CEMP is no longer applicable. The Builders' agreement contains the necessary requirements. Amend the OEMP specification.

- g. The status of the species identifies the threat and the management actions required to address the threat. The CARA categories...*

CARA is no longer applicable. Amend the OEMP

- h. No specification is found in the OEMP to address golf course waste. Revise the OEMP to address this.*

- i. Problems are experienced in small fynbos blocks or fingers that may not be burnt. Large shrubs, e.g. Chrysanthemoides are dying off creating a fire hazard and eyesore.*

The landscape manager/ECO started removing and chipping dead shrubs and brushcutting small blocks to simulate a fire. Revise the OEMP to accommodate such measures.

- j. Red Data book species monitoring*

The OEMP does not address monitoring of Red Data Book species found on the Estate, which is a shortcoming for responsible environmental management. This issue needs to be addressed in the conservation areas management plan.

In addition to these issues, recommendations for review of certain specifications were made in the 2015 audit that also needs to be considered. Many of these recommendations were not repeated in this audit.

5. Findings from the 2015 audit

Issues that were identified to be addressed in the 2015 are the following:

- a. Providing copies of the OEMP to home/property owners:

No additional copies were made available. The OEMP is available for viewing at the PPHOA office.

- b. The compilation of a Conservation Areas Management Plan:

The Conservation Areas Management Plan has been initiated.

- c. Feeding of francolin:

This practise was stopped with positive results for the problems with francolin on the golf course.

- d. Veld monitoring for grazing impact:

This monitoring requirement is being written into the Conservation Areas Management Plan.

6. Conclusions and Recommendations

In conclusion it can be said that Estate Management and the ECO is doing a great job at environmental management of the Estate. Many of the issues raised for improvement of the OEMP or conservation areas management plan originated from the ECO or greenkeeper (via the ECO). The process of addressing these issues has started through revision of the OEMP and development of the Conservation Areas Management Plan. Most of the management related non compliance findings (e.g. monitoring) are due to the protocols being in process of revision and old protocols halted. It was found that the recommendations in the specialist reports (e.g. the Integrated Fire Management Plan) that were not included in the main body of the OEMP were overseen. Once the revised OEMP has been approved, the new monitoring protocols should be implemented to address the non compliance findings.

Compliance issues that were found to need correction action are the following:

- a. The termination of the Conservation Trust that is a condition in the ROD needs correction. 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.
- b. The OEMP state that the leased land should be rezoned. Solutions to this condition of approval need to be sought before the next audit.
- c. The ECO's role in implementation and monitoring of the ACMP need to be clarified or changed in the OEMP. It is recommended that the ACMP be included in the terms of reference for the next audit.
- d. The ECO or PPHOA in consultation with the Technical Manager shall ensure that adequate environmental awareness training of golf personnel takes place.
- e. The Conservation Trust must ensure that an annual assessment/audit of overall game management is undertaken by a suitably informed expert.

Other issues that arose and needs management attention are:

- f. Treatment of the treated effluent to eliminate the salt and lower the pH.
- g. St Blaise trail markers
- h. Review of the golf cart path system

Further recommendations from the audit

- i. A revision of the OEMP is necessary, as well as the development of the Conservation Management Plan.
- j. It is recommended that a specific EMP, as a subsection of the OEMP, be developed to address golf course management issues. This is to enable effective implementation by the golf course management.
- k. 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 OEMP.