

Legend

Nov 2020 EMMP	The boxes with no shading in the below table denote verbatim text from November 2020 Environmental Management and Monitoring Plan for the proposed Cheval Blanc Seychelles Hill View Resort. Prepared for Atvantage (PTY) Ltd. Prepared by: DJ Environmental Consultants
Nov 27th 2023	The boxes with light blue shading denote questions and comments from Karl Saint Ange and Karl Ammann directors of Intendance Retreat Ltd. to MACCE (Laure)

Document	
Nov 2020 EMPP	<p>ANNEXURES:</p> <p>NOTE THAT THE ANNEXURES BELOW ARE CONTAINED IN VOLUME 2 OF THE EIA REPORT</p> <p>Annexure B: Layout Plan</p> <p>Annexure S & Annexure R: Specialist Studies</p> <ul style="list-style-type: none"> • BIODIVERSITY, VEGETATION AND REHABILITATION SURVEYS • SPECIES OF SPECIAL CONSERVATION CONCERN OF THE INTENDANCE BEACH AND WETLAND • TERRESTRIAL AND WETLAND REHABILITATION AND MANAGEMENT PLAN • TERRAIN, TOPOGRAPHY, HYDROLOGY & STORMWATER MANAGEMENT SURVEYS • SOCIAL STUDY • ENVIRONMENTAL AND SOCIAL RISK/HAZARDS & IMPACT MITIGATION SURVEYS • COASTAL SETBACK STUDY • Annexure I: Demolition Application • Annexure Z: Fire Safety Plan
Nov 27th 2023	Could these Annexures be provided they appear to be essential to evaluate level of implementation and compliance on the ground?
1. INTRODUCTION	
Nov 2020 EMPP	<p>Murban (Pty) Ltd acquired the Banyan Tree Seychelles on November 5th, 2018 with the objective of renovating the resort. The intention is therefore to use the existing Banyan Tree resort, renovating and upgrading it to world class standards and present the final Cheval Blanc Seychelles Hill View Resort to attract tourists to the country.</p> <p>The renovation principle for the CBS Hill View Resort Development is to use the footprint of the existing Banyan Tree Resort and limit new buildings to the minimum. This will ensure minimal disruption to the environment.</p>
Nov 27th 2023	Could the built-up square footage of the approved original resort layout be provided and put in context with what is expected to be the final area covered by the new project?
Nov 2020 EMPP	DJ Environmental Consultants (DJEC) in association with Mr Ian Charlette, a local Environmental Assessment Practitioner is appointed by Hill View Resorts (Seychelles) Limited as the independent Environmental Assessment Practitioners. DJ Environmental Consultants

	compiled the Environmental Management and Monitoring Plan (EMMP) in association with ECO-SOL, who is also the appointed Environmental Control Officers on the development site.
Nov 27th 2023	What was the legal status of DJ Environmental Consultants at the time the EIA and the EMMP were submitted in November 2020? Who appointed the ECO, what were the criteria, can a CV be provided?
Nov 2020 EMPP	The EMMP consist of general and site specific mitigatory measures, impacts and mitigation which is zone specific and the monitoring plan for the proposed mitigatory measures and recommendations. There might be repetition of the measures, but this is to ensure effective environmental compliance. The EMMP should also be read in conjunction with the Environmental and Social Impact Assessment (ESIA) Report with specific reference to the Specialist Studies conducted for the development proposal to get a full understanding for the reasons of the proposed mitigatory measures and recommendations. A comprehensive list of all the mitigatory measures and recommendations are contained within the respective Specialist’s Reports.
Nov 27th 2023	Can a copy of the ESIA be provided at this stage as well as the specialist reports recommending the respective mitigatory measures?
2. IMPLEMENTATION OF THE EMMP	
Nov 2020 EMPP	The Environmental Management and Monitoring Plan (EMMP) is as a tool which can be used to minimise the impacts of the proposed development on the immediate and surrounding environment. Potential impacts or “nuisance effects” during construction may include such aspects as noise, dust, pollution, litter, traffic and safety and impacts on flora and fauna. A number of specific management recommendations have been made in this document; however these should be used as a guide only. It should be noted that other types of impacts are possible and that these should be identified during the activities at the site. The EMMP is a dynamic document that is updated with the availability of additional information. Additional mitigatory measures and procedures may be required, and these should be included on an ad hoc basis to improve the overall document. It is recommended that a copy of the decision/notice of acceptance from the Ministry of Environment, Energy and Climate Change (MEECC), and the EMMP be included in the contract document during tender negotiations for the project. The contents of this documentation should be made known to all parties involved at the site and a copy of the EMMP should be available on site at all times.
Nov 27th 2023	Can the most up to date EMMP be provided? One that includes all the onsite updating based on the ‘availability of new information’? To what extent have “additional mitigatory measures and procedures” been found to be required and included in the document as stipulated?
Nov 2020 EMPP	The broad objectives of the EMMP are to ensure that: <ul style="list-style-type: none"> • all environmental safeguards are carried out correctly • site activities are well-managed • adverse impacts on the environment are minimised • the biodiversity of the site is conserved or enhanced • all relevant legislation is complied with, and • the project is monitored for possible environmental impacts.

	It is an open-ended or dynamic document implying that information gained during demolition activities, construction and monitoring of procedures on site could lead to changes in the specifications. The appointed Environmental Control Officer (ECO) will ensure compliance with these specifications and other conditions as set out by the Authorities. These specifications give direction and guidance to all responsible parties. The responsible parties are expected to co-operate closely to minimise or avoid unnecessary environmental impacts.
Nov 27th 2023	Is there a record/log of any ECO interventions to ensure compliance with the specifications and other conditions set out by the Authorities?
Nov 2020 EMPP	The Contractor is obliged to inform the ECO immediately of events that may cause serious environmental damage or breach of the specifications. The ECO in turn will immediately inform the Engineer and Developer and, if necessary, the Authority, of such events. Jointly they will have to speedily resolve any challenges on site.
Nov 27th 2023	Is there a log/records of the ECO having identified any breach of the specifications and the subsequent speedy resolve of any challenge?
3. RESPONSIBILITIES AND AUTHORITY	
3.1 The Developer or duly appointed representative	
Nov 2020 EMPP	The Developer is ultimately responsible for compliance to the specifications as outlined. With respect to the reconstruction and renovation, the developer is to: <ul style="list-style-type: none"> ○ ensure that all relevant approvals and permits have been obtained prior to the commencement of the construction and renovation activities on site; ○ ensure, via DJ Environmental Consultants, that the Environmental Specifications have been updated and approved prior to the start of the activities on site;
Nov 27th 2023	Are there documents available of this step having been carried out – relevant approvals and permits obtained prior to activities on site? May we have a copy?
Nov 2020 EMPP	<ul style="list-style-type: none"> ○ ensure that the environmental management specifications are adhered to at all times; ○ appoint a suitably qualified and experienced ECO prior to the start of construction and renovation activities on site and for the duration of the construction phase. Details of the appointed ECO to be forwarded to the relevant Authority;
Nov 27th 2023	What was/is the ECO job description stipulations for attendance on site? Records of attendance would be appreciated. Since ECO SOL supposedly headed by the ECO was also a party the EIA/EMMP, might that not result in conflicts of interest?
3.2 The Principal Agent / Resident Engineer	
Nov 2020 EMPP	For the purposes of this document “The Principal Agent or Resident Engineer” refers to the engineer for the development, or any other person (such as the architect or project manager) authorised by the Developer, to be responsible for the technical and contractual implementation of the works to be undertaken (herein referred to as the “Principal Agent”).
Nov 27th 2023	Over the project period so far has the Principal Agent/ Project Engineer changed? If so when and for what reason and who were/are the relevant parties?
Nov 2020 EMPP	The responsibilities of the Principal Agent / Resident Engineer are to: <ul style="list-style-type: none"> ○ keep a copy of the EMMP at the property (preferably the site office) where the construction and renovation activities are undertaken. The EMMP must be produced to any authorized official of the Ministry of Environment, Energy and Climate Change

	<p>(MEECC) who requests to see it and must be made available for inspection by an employee or agent of the Developer who works or undertakes work at the property.</p> <ul style="list-style-type: none"> ○ ensure that the requirements as set out in the EMMP and by the relevant Authorities are adhered to and implemented; ○ assist the ECO in ensuring that the recommendations as outlined are being adhered to and promptly issuing instructions requested by the ECO, to the Contractor. All site instructions pertaining to environmental matters issued by the Engineer are to be copied to the ECO;
Nov 27th 2023	Could the log be provided for all the “site instructions pertaining to environmental matters issued by the Engineer are copied to the ECO”?
Nov 2020 EMPP	<ul style="list-style-type: none"> ○ assist the ECO in making decisions and finding solutions to environmental challenges that may arise during the construction process; ○ reviewing and approving reconstruction and renovation method statements (if required) with input from the ECO;
Nov 27th 2023	Have there been reconstruction and renovation statements with the input of the ECO? Can they be provided?
Nov 2020 EMPP	<ul style="list-style-type: none"> ○ ordering the removal of person(s) and/or equipment not complying with the specifications of the EMMP or issuing a stop works order (as required by the ECO or Project managers);
Nov 27th 2023	Have any such orders been issued up to this point in the demolition and construction process? Can the records be provided?
Nov 2020 EMPP	<ul style="list-style-type: none"> ○ issuing warnings for transgressions of environmental site specifications;
Nov 27th 2023	Can copies of such warnings be provided?
Nov 2020 EMPP	<ul style="list-style-type: none"> ○ providing input into the ECO’s on-going internal review of the EMMP.
Nov 27th 2023	Are there copies of the ECO’s internal review of the EMMP on record? May we have a copy?
3.4 The Contractor	
Nov 2020 EMPP	<p>For the purposes of this document “The Contractor” refers to anyone directly appointed by the Developer (company or individual) undertaking the implementation of the works.</p> <p>The Contractor is to:</p> <ul style="list-style-type: none"> ○ ensure implementation of all applicable Environmental Management Specifications, including all additional requirements (if any) related with approved method statements, during all works on site; ○ ensure that all of its sub-contractors, employees, suppliers, agents or servants etc. are fully aware of the environmental management requirements detailed in the EMMP; ○ liaise closely with the Engineer and the ECO and ensure that the works on site are conducted in an environmentally sensitive manner; ○ inform the Engineer as well as the ECO should environmental issues on site go wrong, e.g. dumping, pollution, littering, excessive erosion etc.; ○ carry out instructions issued by the Engineer, on request of the ECO, required to fulfil his/her compliance with the EMMP;
3.5 Environmental Control Officer	
Nov 2020 EMPP	The ECO’s duties, <i>inter alia</i> , must be to ensure compliance with the EMMP through monitoring and proactive and open communication channels with the project/site management and, when necessary, enforce the environmental requirements.

	<p>The ECO's responsibilities should include the following:</p> <ul style="list-style-type: none"> ○ monitoring and verifying that the Environmental Specifications in the EMMP are adhered to at all times and taking decisive action if the specifications are not followed;
Nov 27th 2023	<p>Are there any records of such actions having been taken? Considering the ECO is on the payroll of the developer and was involved in the preparation of this EMMP, what issues in terms of conflict of interest might have been documented?</p>
Nov 2020 EMPP	<ul style="list-style-type: none"> ○ to environmentally educate and raise the awareness of the Contractor and his staff as to the sensitivity of the Site and to facilitate the spread of the correct attitude during works on site and to ensure that educational information is displayed in strategic positions;
Nov 27th 2023	<p>Is there a schedule of such education sessions? Is there a specific curriculum for the sessions which could be provided?</p>
Nov 2020 EMPP	<ul style="list-style-type: none"> ○ to take immediate action on site where clearly defined and agreed no-go areas are violated, or in danger of being violated, and to inform the Engineer of the occurrence and action taken;
Nov 27th 2023	<p>Based on the original Scoping form I was sent and which I filled in in absentia (See "email - KA Ian Charlette RoR (scoping form 08 22 2020)" and "Scoping verification form-8 aug 2020 KA Min of Env Demolition and renovation of ex banyan tree") I reported already the regular traffic from the Chez Baptista hotel/restaurant of guests walking up to the Residence and then down to the rock pool very close to the development site. There are reports that there have already been several serious accidents involving swimming in this rock pool. A trail camera we have mounted at the Residence shows the regular visitors in the end not wanting to walk back down the steep hill and instead take the main road to walk back down and through the construction site. Has any effort been made to minimize these risks and has the ECO informed the Engineer? A hundred images from a trail camera, illustrating the amount of tourist traffic going to the rock pool and then returning on the easier to walk main road down to the main construction camp, can be provided. Exhibit 1</p>
Nov 2020 EMPP	<ul style="list-style-type: none"> ○ monitoring and verifying that environmental impacts are kept to a minimum;
Nov 27th 2023	<p>Taking into consideration the extensive excavation work, the subsequent construction, some backfilling of the wetland, the new access road through a section of the wetland, the establishment of the large-scale staff quarters on site etc. What specifically was done to keep the environmental impact at a minimum?</p>
Nov 2020 EMPP	<ul style="list-style-type: none"> ○ reviewing and approving method statements (if required) together with the Principal Agent / Engineer;
Nov 27th 2023	<p>Can the approved method statements be provided for review?</p>
Nov 2020 EMPP	<ul style="list-style-type: none"> ○ assisting the Contractor in finding environmentally responsible solutions to environmental challenges; ○ keeping records of all activities/ incidents on Site in a Site Diary concerning the environment;
Nov 27th 2023	<p>Can this site diary be provided? Would that mean the ECO was to be on site on any given working day? Would that have included Saturdays and the half day Sundays which were most of the time working days as far as the construction work?</p>
Nov 2020 EMPP	<ul style="list-style-type: none"> ○ inspecting the Site and surrounding areas regularly with regard to compliance with the EMMP; ○ keeping a register of complaints and report these first to the Principal Agent / Engineer for action / follow-up;
Nov 27th 2023	<p>Could the register of complaints be provided? What is/was the process for a neighbor to file a complaint?</p>
Nov 2020 EMPP	<ul style="list-style-type: none"> ○ requesting the removal of person(s) and/or equipment not complying with the specifications (done via the Principal Agent / Engineer); ○ completing start-up, monthly and site closure checklists;

Nov 27th 2023	Can these monthly check lists be provided?
Nov 2020 EMPP	● keeping a photographic record of progress on site from an environmental perspective;
Nov 27th 2023	These photographic records would provide an essential tool as far as establishing the environmental impact since the demolition started and allow comparison with additional third-party photographic records taken in the areas open to the public. Can these photographic records be provided?
Nov 2020 EMPP	● undertaking a continual internal review of the EMMP and making recommendations to the Principal Agent / Engineer.
Nov 27th 2023	Can these recommendations be made available?
Nov 2020 EMPP	● notify, in writing, any proposed changes to the EMMP due to additional information gained as a result of the activities on site.
Nov 27th 2023	Can these records be provided? The November 2020 EMMP was provided to us, it can be reasonably assumed that there have been amendments since the original EMMP was prepared. May we have a copy of the latest amended 2023 version?
Nov 2020 EMPP	● After consultation with the project manager, notify the relevant Directorate of the MEECC immediately of events or incidents that may cause significant environmental damage or breach the requirements of the EMMP and suggest ways to minimize the impacts.
Nov 27th 2023	Could these notifications be provided?
Nov 2020 EMPP	The ECO has the authority to recommend to the Engineer/Principal Agent that works be stopped, if in his/her opinion serious harm to, or impact on, the environment is imminent or is likely to occur or has occurred and such actual or potential harm or impact is in contravention of the EMMP, and which is, or may be, caused by construction, or related works. All stop works orders to the Contractor are, as normal, to be issued through the Engineer or Principal Agent, who in-turn will further discuss corrective action with the Project managers. Upon failure by the Contractor or Contractor's employee to show adequate consideration to the environmental aspects of this contract, the ECO may recommend to the Engineer and the project management team to have the Contractor's representative or any employee(s) removed from the site or have work suspended until the matter is remedied. No extension of time will be considered in the case of such suspensions and all costs will be borne by the Contractor.
Nov 27th 2023	Have there been any stop work orders in the past? Has work been suspended? Have any employees been removed from the site? To what extent was toxic water quality considered in the decision-making process?
Nov 2020 EMPP	The ECO will be responsible for the compilation of a final closure checklist for the project completed when all works related to the project have been completed and the site has been cleared of all construction and renovation related debris, materials or equipment not forming part of the permanent works. This checklist will audit the Contractor's compliance with the EMMP throughout the duration of the construction phase and this checklist, together with a final written report will be submitted to the Engineer to achieve "environmental closure" of the site.
Nov 27th 2023	Is this checklist being maintained auditing the contractor's compliance with the EMMP? Have there been any requests as far as removing construction and renovation related debris/equipment along the main access road starting at the security gate?
4. COMMUNICATION STRUCTURES ON SITE	
4.1 Site meetings	
Nov 2020 EMPP	The ECO is required to attend regular site meetings of the project management team to facilitate the transfer of information and to update all parties on the environmental compliance of the project as a whole and record any additional requirements. This meeting can form part of the existing weekly/fortnightly project site meetings.

Nov 27th 2023	Can the minutes of these meetings be provided going back to the start of the demolition aspect of the project?
4.2 Environmental Education Programme	
Nov 2020 EMPP	The ECO shall arrange for a presentation to site staff to familiarise them with the environmental specifications within two weeks from the Commencement Date of the reconstruction and renovation activities. This presentation should take cognisance of the level of education, designation and language preferences of the staff. General site staff would commonly receive a basic environmental awareness presentation / lecture highlighting general environmental “do’s and don’ts” and how they relate to the site. Management on site e.g. site agents and foremen, who require more detailed knowledge about the environmental sensitivities on site and the contents and application of the EMMP document itself will benefit from a separate presentation dealing with these issues. The ECO may call upon the services of a specialist environmental education translator should this be required.
Nov 27th 2023	Can the list be provided of the general environmental “do’s and don’ts” which was presented to all construction staff? What has been the level of staff turnover in these last three years? Are these lectures repeated for any newcomers?
Nov 2020 EMPP	Contractor general site staff members are to attend an initial presentation of approximately one hour, and approximately half an hour a month thereafter for the duration of the contract shall be allowed for employees to attend any follow-up lectures, should such follow-up lectures be deemed necessary by the ECO. In addition, all new staff and sub-contractor’s employees that spend more than 1 day a week or four days in a month on site are to attend the environmental education program within 1 (one) week of commencement of work. The Contractor shall supply the ECO with a monthly report indicating the number of employees that will be present on site during the following month and any changes in this number that may occur during the month.
Nov 27th 2023	Can the list be provided of the monthly reports to the ECO listing the employees who attended these meetings?
Nov 2020 EMPP	No more than 20 people shall attend each course and the cost, venue and logistics for this / these course(s) shall be the Contractor’s responsibility. This is also to allow for the cost of environmental signage the ECO may require to be erected in the main contractor’s construction camp and any hand-outs given to site staff during initial environmental awareness training presentations. The ECO shall keep a register of all personnel attending the Environmental Education Program.
Nov 27th 2023	Could any copies of these handouts to the staff from the ECO be provided?
Nov 2020 EMPP	The ECO shall further provide the contractor with a list of important environmental requirements to be presented as part of the compulsory Health and Safety induction meetings presented to all new site staff by the contractors. The ECO reserves the right to sit in any of these meetings to confirm that all environmental requirements are adequately presented and reserves the right to present additional dedicated environmental inductions for the duration of the contract to any employees including sub-contractor staff, should such additional lectures be deemed necessary by the ECO i.e. in terms of poor compliance by a certain team or problem aspects.
Nov 27th 2023	Could the list be provided of the important environmental requirements that were handed out at the compulsory Health and Safety induction meetings?
4.3 Method Statements	
Nov 2020 EMPP	The Contractor shall provide Method Statements for approval by the ECO and the Principal Agent/Engineer prior to work commencing on aspects of the project deemed or identified to be of greater risk to the environment and/or which may not be covered in sufficient detail in the EMMP, when called upon to do so by the Engineer or ECO.
Nov 27th 2023	Can these Method Statements be provided?

Nov 2020 EMPP	<p>A Method Statement is a “live document” in that modifications are negotiated between the Contractor and the ECO / project management team, as circumstances unfold. All Method Statements will form part of the EMMP documentation and are subject to all terms and conditions contained within the EMMP.</p> <p>Note that a Method Statement is a ‘starting point’ for understanding the nature of the intended actions to be carried out and allows for all parties to review and understand the procedures to be followed in order to minimise risk of harm to the environment.</p> <p>Changes to, and adaptations of, Method Statements can be implemented with the prior consent of all parties.</p> <p>A Method Statement describes the scope of the intended work in a step-by-step description in order for the ECO and the Engineer to understand the Contractor’s intentions. This will enable them to assist in devising any mitigation measures, which would minimise environmental impact during these tasks. For each instance where it is requested that the Contractor submit a Method Statement to the satisfaction of the Engineer and ECO, the format should clearly indicate the following:</p> <ul style="list-style-type: none"> ○ What - a brief description of the work to be undertaken; ○ How - a detailed description of the process of work, methods and materials; ○ Where - a description / sketch map of the locality of work (if applicable);
Nov 27th 2023	Can these documents describing the changes and adaptations of the methods which occurred during the construction period be provided?
4.3.1 Site Camp and site division	
Nov 2020 EMPP	The location, layout and method of establishment of the workers camp (including all buildings, offices, lay down yards, vehicle wash areas, fuel storage areas, batching areas and other infrastructure required for the running of the project) is critical and it need to consider sensitive environmental area.
Nov 27th 2023	As indicated earlier, did the workers camp locations and related construction camp infrastructure have an environmental impact? Can the original Method Statements be provided and the recent alterations (there is now a new workers camp up on the hillside)? Exhibit 2
4.3.3 Solid Waste Management	
Nov 2020 EMPP	The expected solid waste types, quantities, methods and frequency of collection and disposal as well as location of disposal sites. Include details of the proposed recycling program.
Nov 27th 2023	During the demolition and beginning of the construction we documented the daily burning in a large metal oven type of structure of tons and tons of wood removed from the former resort. Later on, other solid waste was regularly burnt including the leftovers of tree cuttings in the wetland. Were these approved method changes? Exhibit 3 Error! Reference source not found.
4.3.4 Contaminated Water	
Nov 2020 EMPP	Methods of minimizing, controlling, collecting and disposing of contaminated water. No pollution of surface water or ground water resources may occur due to any activity on the property.
Nov 27th 2023	In light of the recent testing of the water in the wetland by various parties, it is clear that the above stipulation was not adhered to. It would appear that as of September 23, large segments of the construction workers were moved off premises at the end of their shift in large open trucks. Was this a further adaptation to the methods in relation to the level of wetland sewage pollution becoming more of an issue after receiving corresponding notices of variations from the ministry?
4.3.7 Dust	

Nov 2020 EMPP	Details on the methods for managing dust on the site. The Contractor shall take appropriate measures to minimise the generation of dust as a result of construction works, operations and activities to the satisfaction of the ECO and the Engineer.
Nov 27th 2023	For the last two years, driving on the main road to the Residence, resulted very regularly (in dry weather conditions) in the car being covered in a layer of dust and having to be washed daily. With the southeast monsoon winds blowing up to the Residence from the area of the hill villa, construction just below, there was also a constant cover of dust which needed attention in and outside of the Residence. What measures were taken to minimize dust pollution? Exhibit 4
4.3.9 Restriction of working areas	
Nov 2020 EMPP	The position, type and height of all permanent and temporary fencing required for the demarcation of the site boundaries, working and conservation areas respectively. Include a program of installation.
Nov 27th 2023	A lot of this green mesh fencing is now in tatters, looks very unsightly and will not prevent third parties from entering sections of the construction site. Are there any plans to rectify? Hopefully with a gap at the bottom so sea turtles can get underneath it? Exhibit 5
4.3.11 Special environments	
Nov 2020 EMPP	Details on the methods for working in specific areas of high conservation or erosion potential (specific reference to the wetland and beach areas).
Nov 27th 2023	Are these Method Statements available considering the recent developments of the new eating salas outside all beach villas with some on the very beach crest? Exhibit 6
Nov 2020 EMPP	Any additional Method Statements as required by the Engineer and ECO must be provided by the Contractor. The Contractor shall not commence the activity until the Method Statement has been approved in writing and shall, except in the case of emergency activities, allow a period of seven working days for approval of the Method Statement.
Nov 27th 2023	On our last visit in September 2023, the road was cut on two occasions with a trench supposedly for the installation of infrastructure. It was not possible to get in and out for some time. Was there a Method Statement seven working days in advance and was this communicated to third parties like us? Exhibit 7
Nov 2020 EMPP	The Engineer / ECO may require changes to a Method Statement if the proposal does not comply with the specification or if, in the reasonable opinion of the Engineer / ECO, the proposal may result in, or carries a greater than reasonable risk of, damage to the environment in excess of that permitted by the Specifications or any legislation. Approved Method Statements shall be readily available on the Site and shall be communicated to all relevant personnel and sub-contractors. The Contractor shall carry out the Works in accordance with the approved Method Statement. Approval of the Method Statement shall not absolve the Contractor from any of his obligations or responsibilities in terms of the Contract. No claim for delay or additional cost incurred by the Contractor shall be entertained due to inadequacy of a Method Statement.
Nov 27th 2023	Again, can the Method Statements be provided for review?
4.4 ECO Diary Entries	
Nov 2020 EMPP	The ECO will maintain a site diary that relates to environmental issues as they occur on site for record keeping purposes. Comments from this diary will form part of reports presented at site meetings by the ECO.
Nov 27th 2023	Can this site diary be inspected? May we have a copy?
4.5 Site Memo Entries	

Nov 2020 EMPP	Site memos, stipulating recommended actions required to improve compliance with the EMMP Specifications by the Contractor will be issued by the ECO to the Engineer, who in turn will ensure that the Contractor is informed of the said instruction. Comments made by the ECO in the Site Memo book are advisory and all Site Instructions required may only be issued by the Engineer. Site Memo's will also be used for the issuing of stop work orders for the purposes of immediately halting any particular activity(ies) if the Contractor deemed to pose immediate and serious risk of unnecessary damage to the environment.
Nov 27th 2023	Can the Site Memo book be inspected? May we have a copy?
4.6 Dispute Resolution	
Nov 2020 EMPP	Where any disputes or disagreements arise between the Engineer or Principal Agent and the ECO, specifically with regard to environmental management on Site and which cannot be resolved, then the matter will be referred to the Developer and if it is still not resolved, it will be referred to the relevant Directorate of the MEECC for clarification and guidance.
Nov 27th 2023	Have any such cases been referred to the MEECC? Can the corresponding records be provided?
4.8 Community Relations	
Nov 2020 EMPP	The Developer (or developers' representative) shall be responsible for responding to third party or public queries and/or complaints relating to operations. In addition, the Developer shall be responsible for dissemination of information to the community and the media (press releases, notice boards, etc.) The protocol for raising complaints should be made available and displayed on the wall, fence of the development site or at the security gate.
Nov 27th 2023	Is there or has there ever been an advertised protocol for raising complaints? In the context of the Residence, a wide range of complaints and requests for information have gone unanswered. Parties referring to NDAs and being told to raise the issue via the IRL lawyers to the HVRSL lawyers, which never resulted in any kind of timely feedback. We eventually had two ad hoc meetings with onsite managers to discuss the lack of water. Are there any records of actions taken? May we have a copy?
Nov 2020 EMPP	The Contractor shall notify the ECO and the Engineer of any complaints lodged. The Contractor shall be responsible for maintaining a Complaints Register to record complaints received and action taken. This register will be made available to the Developer, ECO, the Engineer and the relevant authority.
Nov 27th 2023	Having lodged complaints regarding the condition of the road and the cutting of water and power supply, we met, on two occasions, with a representative of the project management. Are there any records of these meetings and respective relevant action having been taken? Exhibit 8
4.10 Authority Inspections	
Nov 2020 EMPP	Officials from the MEECC and other relevant government officials shall be given access to the property for the purpose of assessing and/or monitoring compliance with the conditions contained in the EMMP, issued or legislation etc. at all reasonable times.
Nov 27th 2023	Are any records available on how often representatives of MEECC were on site monitoring compliance?
5. ENVIRONMENTAL MANAGEMENT SPECIFICATIONS	
5.1 Tree felling and Vegetation removal	
Nov 2020 EMPP	<ul style="list-style-type: none"> • Strict adherence to legal obligations governing tree lopping and cutting protocols to be followed. • Obtain Legal Permits prior to felling of trees from Forestry Department.

Nov 27th 2023	Can copies of all these permits be reviewed? The EIA stipulates that all the trees in areas of active construction work were to be geolocated and marked. Can this tree plan be provided to compare with the cutting permits?
Nov 2020 EMPP	<ul style="list-style-type: none"> • Inspection of site by the authorities to be undertaken to ensure tree felling permit issued Forestry Department is being complied with. (also review Exhibit 10)
Nov 27th 2023	Are there records of any such visits and their outcome except for the one case involving a large Albizia Tree which has already been documented – as not having been compliant?
Nov 2020 EMPP	<ul style="list-style-type: none"> • Trees identified for felling should be clearly tagged. Installing of tyre rings around non-removable tree trunks to prevent damages by heavy machinery working on site.
Nov 27th 2023	Is there any evidence of tyre rings around any of the trees in the last three years? Despite dozens of visits to the area accessible to the public and overlooking the wetlands and beach crest we have never seen such a protection device.
Nov 2020 EMPP	<ul style="list-style-type: none"> • Public announcement of major tree cutting operations and tree cutting signs to be clearly displayed.
Nov 27th 2023	This certainly did not occur in the context of the Albizia Tree that ended up cut down, over two days, into planks by chain saws. Heavy equipment then transported them away. The wooden planks again blocked the road for periods of time. The question arises how many of the large number of other trees cut were specifically authorized? Exhibit 9
Nov 2020 EMPP	<ul style="list-style-type: none"> • General public and forest hikers to be prohibited access to tree felling zone.
Nov 27th 2023	Based on the initial sanction for this resort being developed, there is meant to be a 30-meter corridor from the high tide mark for public access. It appears to now include several areas where trees were cut down. See Exhibit 10 and original sanctions (“LTR-09 Jul 2010 Min of Land Use Lionnet to Chang Sam”). Was there ever any notice to the public of such felling? In what way were forest hikers informed of access restrictions? I assume the forest hikers are the tourists going to the rock pool via the forest trail from Chez Baptista.
Nov 2020 EMPP	<ul style="list-style-type: none"> • All tree loppers must undergo an environment and safety awareness session.
Nov 27th 2023	The local tree cutting crews we interacted with were working in flip flops, no uniform, no helmets, no gloves and they used their heavy-duty chain saws. Did they undergo safety awareness sessions? Exhibit 11
Nov 2020 EMPP	<ul style="list-style-type: none"> • A Tag-system to be put in place for all protected trees with a fine/penalty system for illegal felling.
Nov 27th 2023	Was this tag system put in place and can it be inspected?
5.2 Site Hording	
Nov 2020 EMPP	<ul style="list-style-type: none"> • Hoarding must be suitable and appropriate to serve intended purpose with allowances for Turtle Friendly Netting at Coastal frontage.
Nov 27th 2023	Is/was the green netting along the beach front considered turtle friendly? There are witness accounts of turtles trying to get through it and not succeeding.
Nov 2020 EMPP	<ul style="list-style-type: none"> • From an aesthetic point of view, hoarding of the site is proposed with environment blending materials or fabric in regard to the Public Access Zone and Coastal Frontage. Please see our approved Hoarding application which is appended to the draft EIA.
Nov 27th 2023	Never received these appendices, but we would welcome viewing the approved Hording Application?
5.3 Waste management	
5.3.1 Solid waste management	

Nov 2020 EMPP	<p>Various types of wastes such as concrete, wood, iron bars, metals, bricks, glass, plastics and building components (doors, windows, electric copper wires and pipes amongst others). Appropriate measures should be taken to reduce environmental nuisances to the neighbourhood.</p> <p>Mitigating measures include:</p> <ul style="list-style-type: none"> • Wastes such as concrete and bricks to be reused as backfill material on site first as far as possible or be sent for reprocessing at stone crushing plants (if any) or removed from site to pre-identified registered landfill sites. • Emphasis should be on recycling and use of biodegradable materials for composting on site during landscaping. Building components (doors, windows) and wood should be reused or recycled as far as possible. All recyclable wastes, including iron bars, metals, and plastics to be properly collected for eventual recycling.
Nov 27th 2023	<p>Wood burning during the demolition phase and thereafter was extensive. Was there any attempt at recycling any of the removed Banyan Tree building materials? Which registered landfill sites were used? (see earlier images). Exhibit 12</p>
Nov 2020 EMPP	<p>Waste should not be dumped on any bare land, premises or in any watercourse including drains and canals.</p> <ul style="list-style-type: none"> • Necessary precautions should be taken to ensure that stockpiled debris do not present an eyesore and not be unduly visible or intrusive in the street scene. All waste material has to be recycled to ensure minimisation of waste and the rest will have to be removed from site as per land waste management protocols. All waste not recyclable should be disposed of on designated landfill.
Nov 27th 2023	<p>Will provide some images of debris along the road which represents an eye sore and, in some places, makes the passage of two vehicles impossible. The original project proposal stipulates the opening of the resort by July 2022. Will anybody provide some details as to the expected completion date? We would think that this information is part of community relations? May we have a list of items which have been recycled? Exhibit 13</p>
Nov 2020 EMPP	<ul style="list-style-type: none"> • There should be provision of adequate waste receptacles and waste collection point and an effective waste removal contract.
Nov 27th 2023	<p>Can a copy of the waste removal contract be provided?</p>
Nov 2020 EMPP	<ul style="list-style-type: none"> • Waste management awareness to site workers. • There should be effective Management of Stock Piles on site. • Periodic audit to be undertaken of waste management system.
Nov 27th 2023	<p>Are these audits being conducted? What have been the outcome considering the attached imagery?</p>
5.4 Dust management	
Nov 2020 EMPP	<ul style="list-style-type: none"> • Demarcated area for stacking construction materials that is well protected from strong wind. • Hoarding of stock piles. • Periodical watering to reduce emission of harmful dusts. • Water spraying of the site (preferable non-potable water) should be carried out to reduce dust nuisance. • Materials and stockpiles should be covered or sprinkled. • All staff should wear personal protective clothing.
Nov 27th 2023	<p>Have commented on the dust management earlier. It would appear that practically none of the staff are wearing protective clothing or uniforms. Is there evidence of staff being provided protective clothing?</p>
5.5 Eco-friendly Measures and Sustainability	
Nov 2020 EMPP	<ul style="list-style-type: none"> • Best environment friendly practices and initiatives need to be adopted, such as adoption of sustainable deconstruction techniques instead of demolition ones.

Nov 27th 2023	The images provided for the demolition process do not illustrate sustainable deconstruction. Was any of the old resort building material recycled? Exhibit 10 , Exhibit 11 , Exhibit 12
Nov 2020 EMPP	<ul style="list-style-type: none"> • Works should be undertaken under the supervision of a qualified personnel. Workers must be provided with suitable respiratory protective equipment when required. • Provision of temporary appropriate on-site wastewater disposal facility for disposal of wastewater generated by workers on-site.
Nov 27th 2023	Except for some mobile toilets in some locations, there has not been any evidence of a working sewage plant or regular visits by extraction trucks to take away sewage. How was/is the sewage disposed of? Is there a corresponding contract that may be reviewed?
Nov 2020 EMPP	<ul style="list-style-type: none"> • Relevant organizations need to be consulted about occupational health and safety, re-use/ disposal of waste debris, amongst others, prior to embarking on the site works to ensure compliance with their respective laws/regulations/standards. • Selection of appropriate working tools. Vibration may de-stabilise the environment (soil/ fauna) / Biodiversity migration. • Clean and disinfect existing sewer network, pump any residual sewerage content by an approved cesspit emptier and dispose at PUC sewerage treatment plant.
Nov 27th 2023	Can detailed accounts be provided for this extraction to have been subcontracted to a qualified party?
Nov 2020 EMPP	<ul style="list-style-type: none"> • Both guests and staff of the hotel should be sensitized on the importance of the beach and wetland habitats and their species. • Behavioural guides on nesting and hatchling turtles should be distributed to all guests of the resort and hotel security staff should be trained on the correct conduct when encountering emerging turtles and hatchlings.
Nov 27th 2023	There was such a project operated by MCSS on behalf of the former owners of the hotel. Except for the same society doing the nest monitoring, there appears to have been no such outreach since the new project started. Could the behavioural guides be provided as well as any data/statistics on who has received these materials?
Nov 2020 EMPP	<ul style="list-style-type: none"> • The shoreline should be stabilized to reduce erosion and destroyed turtle nests through the rehabilitation of beach fringe vegetation, in particular <i>Scaevola taccada</i>, which is suitable for turtle nesting habitat.
Nov 27th 2023	As it stands, the more recent drone images show a thinning out of a lot of the beach vegetation which was also documented walking along the beach. What are the plans to restore the beach crest to its original condition? What efforts were made to stabilize the beach crest and restore it afterwards? Exhibit 14
Nov 2020 EMPP	<ul style="list-style-type: none"> • If artificial light outside infrastructure along the beachside is crucial once the development is complete, only turtle-friendly lights should be used in these areas, and only outside of the nesting season, while internal lights should be minimized with the use of curtains and/or blinds.
Nov 27th 2023	A Google search of Mortimer turtle friendly lighting does not yield any results. The document was not attached to the original EIA. Can it be provided and is there confirmation that it will be complied with?
5.6 Climate Change & Sea Level Rise	
Nov 2020 EMPP	<ul style="list-style-type: none"> • It is recommended to build the new structures landward of the erosion line as determined for a 100-year return period storm event the end of design life (2040), i.e.: <ul style="list-style-type: none"> o Profile A: 12.5 m behind the existing vegetation line o Profile B: 15.0 m behind the existing vegetation line o Profile C: 14.5 m behind the existing vegetation line

Nov 27th 2023	This area is not accessible to the public and as such there is no way to verify that such a structure landward of the erosion line has been built. Could you clarify? Could documents/photographs be provided of the new structures? The front part of these villas does not indicate that these profiles have been complied with. See also Exhibit 14
Nov 2020 EMPP	<ul style="list-style-type: none"> • Considering the existing structures, the Beach Villas at: <ul style="list-style-type: none"> o Profile A requires approximately 4.5 m of additional setback o Profile B requires approximately 0.5 m additional setback. o Alternative mitigation measures include erosion protection, e.g. by means of sleeping revetments in front of the structures.
Nov 27th 2023	Taking the additional dining salas/terraces into consideration, has the “additional set back profile” been applied or did the opposite take place?
Nov 2020 EMPP	<ul style="list-style-type: none"> • To minimise the risk of flooding it is recommended that floor levels should be constructed above the runup level for a 100-year return period storm event the end of design life (2040), i.e.: <ul style="list-style-type: none"> o Profile A: above 5.21 m MSLD o Profile B: above 4.99 m MSLD o Profile C: above 4.87 m MSLD. ▪ (See Specialist Report in the draft EIA report, Figure 5-3, Annexure R, for Profile locations)
Nov 27th 2023	Could the specialist report be provided to try to evaluate developments from areas accessible along the beach? The three steps leading to the sand from the beach villas do not appear higher than just over a meter in any given area. Exhibit 15
5.10 New Foreign Workers	
Nov 2020 EMPP	<ul style="list-style-type: none"> • There should be convenient and suitable certified workers accommodation on site according to public health requirement and planning authority.
Nov 27th 2023	Is there a copy of the certification of the workers accommodation?
Nov 2020 EMPP	<ul style="list-style-type: none"> • All employees must be trained in environmental, health and safety protection protocols, environmental due diligence including community behaviour and adaptation. • Adequate and suitable sanitary facilities on site.
Nov 27th 2023	Can a listing be provided for the suitable sanitary facilities including sewage treatment onsite?
Nov 2020 EMPP	<ul style="list-style-type: none"> • Adequate and appropriate health, environment and safety signage on site. • Environmental due diligence to be followed. • All employees must be medically screened and certified free from communicable and occupational diseases.
Nov 27th 2023	Considering the health risk created by the water quality in the wetland, is this certification available?
5.12 Timeframe	
Nov 2020 EMPP	<ul style="list-style-type: none"> • Refer to the Milestone Schedule in Chapter 4 of the EIA Report.
Nov 27th 2023	Considering that the project is already 18 months late as far as the original completion deadline can an updated Milestone Schedule be provided? It has been requested several times without any kind of response.
5.13 Services	
Nov 2020 EMPP	<ul style="list-style-type: none"> • The client will ensure disconnection of the services by qualified contractors on site.

	<ul style="list-style-type: none"> • A Cable Avoidance Tool (CAT) detector or appropriate equipment will be used by the site supervisor to test for live underground electric cables prior to commencement on site and highlighted using spray marker.
Nov 27th 2023	When the power supply to Residence on the Rocks stopped, we tried to locate the problem by following the original armored power cable. There was no sign of it having been marked with any spray marker. Due to location access restrictions, it was impossible to locate. Can the location be provided? Exhibit 16
5.16 Toilets	
Nov 2020 EMPP	<ul style="list-style-type: none"> • The Contractor shall provide suitable sanitary arrangements at the Contractor's camp and approved points around the designated work area to allow easy access to all employees on site.
Nov 27th 2023	Can a list of the approved sites be provided? Exhibit 17
Nov 2020 EMPP	<ul style="list-style-type: none"> • 1 toilet for each 10 employees on site. These toilets must have doors and locks and shall be secured to prevent them from blowing over. Toilet paper shall be provided.
Nov 27th 2023	Considering a reported 700 construction staff members on site can the lay out of the 70 toilets be provided?
Nov 2020 EMPP	<ul style="list-style-type: none"> • These facilities should be located away from the water course as to prevent water contamination. Effective and safe sewerage collection and disposal treatment system for construction phase to be installed. Permitted by Public health.
Nov 27th 2023	What was the original installation and where is the one for the new staff quarters located up on the road leading to the residential area? In what form did the public health authority sign off on these facilities? What records exist for regular sewage collection?
Nov 2020 EMPP	<ul style="list-style-type: none"> • Toilets are to be emptied prior to builder's holidays. • The Contractor shall ensure that no spillage occurs when the toilets are cleaned or emptied and that the contents are removed from site. Discharge of waste from toilets into the environment and burial of waste is strictly prohibited.
Nov 27th 2023	Who controlled the discharge on site for the last two and a half years of demolition and construction work?
5.17 Safety and Security	
Nov 2020 EMPP	<ul style="list-style-type: none"> • All necessary registers, accident books, diary, time book, test certificates, method statement, risk assessment, health and safety plan etc. will be kept on site under the control of the Site Supervisor /Engineer and can be inspected at any time. All accidents are to be reported and entered in the site accident book.
Nov 27th 2023	Can the public health records for staff be inspected? There have been reports of ambulances arriving on site.
Nov 2020 EMPP	<ul style="list-style-type: none"> • A supply of spare hard hats, overalls, gloves, goggles, masks, welders' gloves, face visors (when burning equipment is used) etc. will be stored on Site.
Nov 27th 2023	Can this storage facility be inspected? A large majority of the staff have been seen from public access areas lacking any kind of protective clothing or uniform.
Nov 2020 EMPP	<ul style="list-style-type: none"> • At all times, the appointed contractor will ensure a high standard of Health and Safety is always carried out on site. • All operatives on site must wear full Personal Protective Equipment (PPE) in accordance with the relevant Health and Safety legislation requirements including safety boots, hard hats and a high visibility vests or coat and LEP (Light Eye Protection) as standard.
Nov 27th 2023	Was this ever implemented/adhered to?
Nov 2020 EMPP	<ul style="list-style-type: none"> • 'No smoking on site' policy will always be adhered to. • Adequate segregation of pedestrians and vehicular traffic always to be maintained. Reversing of vehicles and plant will always be minimized. This will be highlighted on a site plan and will form part of the site induction for all operatives.

Nov 27th 2023	Can this site plan be provided?
Nov 2020 EMPP	<ul style="list-style-type: none"> • All opening in grounds must be adequately identified and protected to prevent fall into the trenches. • Access control to authorized persons only and site perimeter control. • Usage of physical site security control and camera for monitoring.
Nov 27th 2023	Is there any physical site control and site perimeter control except for the staff at the main gate? E.g the rock pool footpath from Chez Baptista: Exhibit 18
Nov 2020 EMPP	<ul style="list-style-type: none"> • Stray animals and rodents may disturb existing environmental impact control. Stray animals and rodent control to be exercised through perimeter control.
Nov 27th 2023	Has there been any kind of attempt at stray animal control considering the regular sightings of dogs and cats with a group of dogs seemingly having established a territory on the beach?
5.19 Recycling	
Nov 2020 EMPP	<ul style="list-style-type: none"> • Wherever possible, materials used or generated by construction should be recycled.
Nov 27th 2023	Has there been any recycling of any of the material when the original resort was demolished? (except for maybe some window frames which were piled up at one time). Exhibit 12
Nov 2020 EMPP	<ul style="list-style-type: none"> • Where possible and practical, such as at stores and offices, waste shall be sorted for recycling purposes.
Nov 27th 2023	The former waste recycling area was demolished. Was a new one set up and where?
5.20 Prevention of Water Pollution	
Nov 2020 EMPP	<ul style="list-style-type: none"> • The Contractor shall prevent pollution of surface or ground water as a result of construction activities. Such pollution could result from the release, accidental or otherwise, of chemicals, oils, fuels, sewage, water from excavations, construction water, water carrying soil particles or waste products etc. • Demarcated area for stacking construction materials that is well protected from storm water passage and adequate storage bunding, preventative drains around stock piles. • Emergency action procedure drafted for water way protection during spill; use of hoarding, netting and other sedimentation mitigation measures on site. • Water accumulated in trenches and in ground hole should be used as much as possible in construction process and cleaning of vehicles and tools • Sedimentation traps and ponds should be installed to prevent spill over of polluted and dirty run off water from upstream to downstream towards the wetland, beach and eventually sea causing habitat pollution and biodiversity migration and destruction.
Nov 27th 2023	This has clearly turned into a major issue considering the wetland water analysis and the corresponding findings.
Nov 2020 EMPP	<ul style="list-style-type: none"> • No wastewater to be discharged either on the surface of the ground or into rivers/canals/wetlands/sea. All mitigatory measure should be put in place to protect natural water bodies from being polluted.
Nov 27th 2023	What mitigatory measures were put in place? What were the results? How do they compare to the third-party results? Can they be inspected? See “A Review of the possible impact caused by wastewater on a wetland habitat. A literature review of: Anse Intendance, Mahe, Seychelles”
5.21 Water Sampling and Testing	

Nov 2020 EMPP	<ul style="list-style-type: none"> • Water sampling and testing may be required if the Engineer or ECO have reason to believe that an activity on site may have resulted in harmful effluent, or if stormwater is believed to be contaminated by the construction activities.
Nov 27th 2023	Has the ECO arranged for any water testing for effluent? How often? What were the results?
5.23 Erosion Control	
Nov 2020 EMPP	<ul style="list-style-type: none"> • During construction the Contractor shall protect areas susceptible to erosion by installing necessary temporary and permanent drainage works as soon as possible and by taking other measures necessary to prevent the surface water from being concentrated in streams and from scouring the slopes, banks or other areas. • The Engineer will suggest and approve erosion prevention measures where required.
Nov 27th 2023	What erosion prevention measures have been suggested and approved by the engineer?
5.24 Stormwater Controls	
Nov 2020 EMPP	• Refer to the Stormwater Management Plan and recommendations proposed by the Specialist in Annexure S, Terrain, Topography, Hydrology and Storm water Management Survey.
Nov 27th 2023	Can the Stormwater Management Plan - Annexure S, Terrain, Topography, Hydrology and Storm water Management Survey - be provided?
Nov 2020 EMPP	<ul style="list-style-type: none"> • The Contractor shall take reasonable measures to control the erosive effects of stormwater runoff. • Material from sand / soil stockpiles or any other source shall not be allowed to wash into the system, thus clogging catch pits, pipes or silting up receiving water bodies or systems. • Similarly, water extracted from excavations on site shall be free of any suspended silts/pollutants (e.g. through the use of a filtered extraction point) prior to being directed into the stormwater system.
Nov 27th 2023	How was the water from extraction points filtered? Error! Reference source not found.
5.25 Fauna	
Nov 2020 EMPP	• Catching of wild animals (including reptiles, amphibians, birds and invertebrates, etc) by any means, including setting of snares, poisoning, shooting and trapping is prohibited. All incidents of harm to any animal must be reported to the ECO.
Nov 27th 2023	What capture operations have taken place? What incidents involving animals have been reported to the ECO? What biodiversity inventories have been carried out since the EIA was completed?
5.26 Fire Control	
Nov 2020 EMPP	<ul style="list-style-type: none"> • The Contractor shall take all reasonable and active steps to avoid increasing the risk of fire through their activities on Site. • Conduct fire risk assessment and ensure all measures are taken to reduce the risk of a fire occurring on site during construction. • The Contractor shall ensure that the basic fire-fighting equipment is available on site and is to the satisfaction of the Local Fire Services or relevant authority. • The Contractor shall supply all site offices, kitchen areas, materials stores and any other areas identified by the Engineer with tested and approved firefighting equipment. • Welding, gas cutting or cutting of metal will only be permitted within specifically designated and adequately marked areas on the site. These sites are to be approved by the Engineer and the ECO. All “hot” work areas must have fire extinguishers readily at hand. Implement Hot work (welding, grinding & metal cutting) permit procedure (naked flame control).

	<ul style="list-style-type: none"> • Fires for heating or cooking, e.g. a braai facility, shall only be permitted at designated sites in the construction camp. These sites will be approved at the discretion of the Engineer and ECO and shall be away from any flammable stores. Such fires shall be supervised at all times; a fire extinguisher shall be at hand as well as sufficient water to completely douse the fire after use. • The Contractor shall provide firewood from a source acceptable to the Engineer. Wherever possible, charcoal or gas should be used. • The disposal of any material by burning is prohibited.
Nov 27th 2023	Burning of material for months and months has been going on since the demolition phase of the project and is still ongoing. Who authorized setting up the large metal container used for the burning at the center of the construction site?
5.28 General Housekeeping	
Nov 2020 EMPP	<ul style="list-style-type: none"> • The contractor is to keep all working areas and the site in general in a neat and tidy condition at all times, including neat and safe stacking and storage of materials and equipment, and management of waste materials at appropriate intervals.
Nov 27th 2023	How are “appropriate Intervals” defined? The main access road up to the residential area has been partially blocked and completely blocked by construction waste. Exhibit 20
5.29 Social	
Nov 2020 EMPP	<p>Land take mitigation measures:</p> <ul style="list-style-type: none"> • Those living along the access road will require sensitization and awareness about the project, the construction timeframe as well as any grievance mechanisms implemented for complaints
Nov 27th 2023	Has there been a grievance mechanism? Have there been any complaints that can be reviewed? Recently a construction company lorry hit one of the power poles on the main access road from Taka Maka. It resulted in a 5-6 hours power cut for the whole of the area. Was the case investigated? What was the result?
Nov 2020 EMPP	<p>Traffic and Congestion mitigation measures:</p> <ul style="list-style-type: none"> • The contractor will control haulage speed especially near the junction leading to the property by placing requisite warning signs.
Nov 27th 2023	Were any such warning signs put into place?
Nov 2020 EMPP	<ul style="list-style-type: none"> • Drivers will be inducted at the start of the Project about road safety and due diligence to ensure safety of other road users. • No haulage of materials will occur during the school’s at starting and finishing times, or during night periods, unless materials quality is at risk (such as bitumen and concrete) and/or special permissions are sought from the authorities. <p>Interaction between workers and the local community mitigation measures:</p> <ul style="list-style-type: none"> • The project should have a suitable policy for interaction between workers and local people.
Nov 27th 2023	Has such a policy been implemented? Can it be provided?
Nov 2020 EMPP	<ul style="list-style-type: none"> • Non-project workers except official visitors must not be allowed on site. • The work site should provide free condoms to their workers and HIV/AIDS information posters. • The contractor will sensitize workers on HIV/AIDS and responsible living. Orientation on HIV/AIDS shall be conducted for workers and continual sensitization done during weekly toolbox meetings.
Nov 27th 2023	Has any of this been implemented? Can minutes of the weekly toolbox meeting be provided? Is HIV testing required as part of the original health certification for staff? Could we see the action plan?
Nov 2020 EMPP	<ul style="list-style-type: none"> • As a contractual obligation, the contractor shall have an HIV/AIDS policy and action plan to implement it for this project.

	<ul style="list-style-type: none"> • An HIV/AIDS training and awareness campaign should be conducted to target construction workers and the community. The goal of training and awareness will be to reduce the risk of transmission of HIV/AIDS during and after construction and will entail; training, support for behaviour change and provision of condoms. • Similar health protocols in relation to the COVID-19 pandemic should also be implemented, pertaining to vigilance, hygiene and prevention measures. <p>Prohibited human interactions with the facilities mitigation measures:</p> <ul style="list-style-type: none"> • Improve security measures by placing guards and/or more signage in different languages. Notably, warning signs regarding the swimming conditions should be placed
Nov 27th 2023	The former resort management used to put up warning flags on a tower during certain wave conditions and had a lifeguard on watch. Why was this discontinued? Could we see the action plan?
Nov 2020 EMPP	<ul style="list-style-type: none"> • Access to the facilities should be strictly regulated during construction, given the health and safety hazards involved. <p>From consultations with the public, the following summary recommendations are made for the Client’s consideration:</p> <ul style="list-style-type: none"> ○ To formalize the relationship between hotel and district via an MOU with Takamaka District Administration which will seek to prioritize the district’s needs especially in relation to early engagement with small scale entrepreneurs and business owners during all phases of the project.
Nov 27th 2023	Does such an MOU exist? Can it be provided?
Nov 2020 EMPP	<ul style="list-style-type: none"> ○ Careful traffic management plan in place and measures to be taken to mitigate noise and dust emissions during construction phase. ○ Client to maintain discreet security on the beach and consider placing lifeguards on site given the near drowning reports.
Nov 27th 2023	Why has this not been done?
Nov 2020 EMPP	○ Primary consideration of employment of Takamaka residents and re-hiring of ex-BTS employees.
Nov 27th 2023	How many Taka Maka Residents have been employed?
Nov 2020 EMPP	○ MEECC to continue engagement around environmental conservation program.
Nov 27th 2023	In what way has the engagement with MEECC continued considering the turtle and terrapin rescue and rehabilitation center was removed? Exhibit 21
6.3 Terrestrial and Wetland Rehabilitation and Management Plan	
Nov 2020 EMPP	<p>The Terrestrial and Wetland Rehabilitation and Management (R & M) plan draws from the biodiversity assessment of the project site and it elaborates some actions that need to be undertaken to better the environmental conditions of the project site.</p> <p>The objectives of the R&M Plan as highlighted by the Specialist (Dr Elvina Henriette) are to:</p> <ol style="list-style-type: none"> 1. Establish and improve on the current baseline environmental conditions including indicators of wetland health (flagship species inventories, micro biotic and abiotic ones (e.g. acidity, phosphate and nitrate loads, upland land use development, etc.).
Nov 27th 2023	Was there any census done of fauna and flora species in the wetland at the start of the project? Were water samples analyzed? What were the results?

Nov 2020 EMPP	2. Conduct long-term ecosystem monitoring (monitoring of pollutants, water quality and biodiversity) to evaluate the success of the R & M plan.
Nov 27th 2023	Can any of this monitoring data be provided?
Nov 2020 EMPP	3. Manage invasive fish in the wetland.
Nov 27th 2023	How was that accomplished?
Nov 2020 EMPP	4. Manage both terrestrial and aquatic Invasive Plant Species invading the forest and the wetlands.
Nov 27th 2023	How was that accomplished considering there is now more duck weed coverage than ever before and the hyacinth are far from eradicated and likely to also drastically expand again.
Nov 2020 EMPP	5. Manage the dense Freshwater fern area to improve hydrology and biodiversity. 6. Replant and manage the beach crest and plateau along the coast.
Nov 27th 2023	The beach crest vegetation has been severely damaged in many areas. With heavy construction now completed when will the replanting be done?
Nov 2020 EMPP	7. Train and enhance restoration skills and knowledge amongst Hotel staff, local communities and participating organisations. 8. Enhance public awareness on the importance of wetlands, their rehabilitation and management. <ul style="list-style-type: none"> • a. Hydrological characteristic: water regime and flow (flowing water, standing water, saturated soils, floating mat etc.) <ul style="list-style-type: none"> — b. Biological/ecological characteristics: i. Habitat types (forested, shrub, emergent, moss-lichen, aquatic bed, unconsolidated bottom, rock bottom etc.), — ii. Species inventory: aquatic and terrestrial plant and animal species presence and abundance (rare, frequent, occasional, common, abundant). Species status (native or exotic).
Nov 27th 2023	Has this data been collected? Is it available?
Nov 2020 EMPP	<ul style="list-style-type: none"> — iii. Dominant, rarest and indicator species. — — c. Physio-chemical characteristics of water including water quality: pH, salinity, conductivity, turbidity, colour, nitrates, phosphates, POPs, dissolved oxygen, biological agents like bacteria (E.coli)
Nov 27th 2023	What data has been collected during these first three years of construction? See “A Review of the possible impact caused by wastewater on a wetland habitat.”
Nov 2020 EMPP	<ul style="list-style-type: none"> — d. Geomorphological characteristics: i. Substrate type (organic or mineral) — ii. General composition (silt, sand, clay, loam, mud, rubble, rock etc.) — iii. Hydric soil indicators (high organic content, sulphuric odour, organic streaks) — iv. Substrate colour — v. Micro-topographic features of the wetland (channels, islands, mounding) — e. Threats and disturbances: presence of waste, pollution, drainage, reclamation, farming, algal bloom, salting, clearing, invasive alien species etc.
Nov 27th 2023	What data has been collected? Can it be made available?
6.3.1 Rehabilitation and Management (R&M) – Wetland	
Nov 2020 EMPP	Long-term monitoring programme should include:

	1. Water quality: analysis of water to detect pollutants such as waste and fertilisers from the farm (e.g. nitrate, phosphate etc), and biological contamination through the presence of E.coli as well as other general characteristics of the water (conductivity, pH, biological oxygen demand)
Nov 27th 2023	Are these results available for comparison with the latest samples?
Nov 2020 EMPP	<ul style="list-style-type: none"> — 2. Environmental indicator species or species of special conservation value i. Yellow bittern (<i>Ixobrychus sinensis</i>) — ii. Black crown night heron (<i>Nycticorax nycticorax</i>) — iii. Seychelles Kestrel (<i>Falco araea</i>) — iv. Yellow belied mud terrapin (<i>Pelusios castanoides</i>) and the Black mud terrapin (<i>Pelusios subniger</i>) — v. Green (<i>Chelonia mydas</i>) and Hawksbill turtle (<i>Eretmochelys imbricata</i>) — vi. Freshwater crustaceans (freshwater prawns and shrimps) — vii. Freshwater endemic fish Golden panchax (<i>Pachypanchax playfairii</i>) and Eel (<i>Anguilla bicolor</i>.
Nov 27th 2023	What census work has been done at the beginning of the project? What since? What are the results/losses so far?
Nov 2020 EMPP	<ul style="list-style-type: none"> — viii. Amphibians Seychelles Tree frog (<i>Tachycnemis seychellensis</i>) — ix. Other interesting fauna that may be captured during the other monitoring — 3. Invasive Alien Species
Nov 27th 2023	Same for the above?
Nov 2020 EMPP	These parameters will be used to define, classify and characterize the changes in wetland. The data will also build up on the baseline for the future studies or monitoring.
Nov 27th 2023	This will be an interesting database to have.
6.3.2 Ecosystem monitoring	
Nov 2020 EMPP	<p>The following are to be monitored at least once a year.</p> <p>a) Invasive fish Tilapia (<i>Oreochromis mossambicus</i>)</p> <p>b) Invasive creeper in the forest, Merremia (<i>Merremia peltata</i>) and Centipede tongavine (<i>Epipremnum aureum</i>)</p> <p>c) Invasive water weeds in the wetland</p> <p>i) Duckweed (<i>Lemna perpusilla</i>)</p> <p>ii) Hydrilla (<i>Hydrilla verticillata</i>)</p> <p>iii) Water hyacinth (<i>Eichhornia crassipes</i>)</p> <p>iv) Water lily (<i>Nymphaea lotus</i>) a. Netting techniques such as gill and seine netting can remove substantial numbers of fish, particularly in small enclosed waterbodies where fish are unable to escape. Nets need to be monitored regularly for by-catch of native species, which should be released if captured. These techniques are relatively simple and cost-effective when compared to other techniques.</p> <p>b. Electrofishing done on a regular basis is a relatively cost-effective way of controlling tilapia in small waterbodies. Electrofishing works by passing an electrical current into the water to stun fish, and enables a person to capture unwanted fish with a net. This can be done with a battery-operated electrofisher. This equipment is fairly expensive (USD 600), potentially hazardous to operators and should only be used by highly trained staff.</p>

	c. Angling can be used to remove relatively small numbers of fish from selected watercourses (e.g. during fishing competitions or recreational fishing). Angling or recreational fishing are not effective means of population control and/or eradication. However, bringing the clients or community together to focus on tilapia removal from local watercourses does help to raise public awareness of the pest fish issue.
Nov 27th 2023	Considering that the demolition and rebuild started some three years ago, what baselines and parameters have been established? Was this monitored on a yearly basis as stipulated?
6.3.4 Management of Alien Invasive Creepers	
Nov 2020 EMPP	<p>Two invasive creepers are found on the site:</p> <ul style="list-style-type: none"> • The Centipede tongavine (<i>Epipremnum aureum</i>) which is in an early stage of colonisation (and hence can be eradicated) • <i>Merremia (Merremia peltata)</i> which is widespread on the property particularly in the eastern side and for which complete eradication will be difficult but it can be controlled. <p>The invasive creepers can be controlled in the following ways:</p> <p>Physical management: Physical control alone is not effective in controlling and eliminating invasive creepers because any roots, stems or pieces left behind will sprout. Nonetheless, the following protocol can be followed for physical control of creepers: - In the dry season, cut the lower part of the creeper and remove it from the trunk as high up as possible by hooking and pulling the parts in the trees; Uproot and remove the tubers and rhizomes from underground; Place all plant materials removed on a rock or a raised platform to dry; Conduct post-treatment planting in gaps to prevent re-colonisation of invasive creepers and soil erosion.</p>
Nov 27th 2023	Have any such measures been attempted in the last three years?
6.3.5 Management of Wild Tamarin (Kasi, <i>Leucaena leucocephala</i>)	
Nov 2020 EMPP	<p>Kasi is a fast-growing shrub or small tree growing 2-10 m tall. Kasi grows very fast in suitable sites; forming dense, thickets that are difficult to control once established. Invaded areas become unusable and inaccessible. It displaces native vegetation and can promote suitable conditions for the establishment of even more aggressive invaders. Nominated among 100 of the "World's Worst" invaders by the IUCN Invasive Species Specialist Group.</p> <p>Physical management: The control of Kasi can be done by cutting and uprooting them using a machete, chain or a small excavator in the case of dense stands. The site replanted with appropriate native species.</p>
Nov 27th 2023	Has there been any such eradication and replanting? Is any photographic coverage available?
6.3.6 Management of Duckweed (<i>Lemna perpusilla</i>)	

Nov 2020 EMPP	<p>Duckweed is a very small floating plant. It has shoe-sole shaped leaves with a small hair-like root hanging below. Once established, duckweed in ponds can cover the entire water surface and resemble a golf course green. It can cut off sunlight to submersed plants and cut off oxygen to fish and other wildlife.</p> <p>Physical management: One duckweed control method is by raking and skimming it off the water's surface. Duckweed typically prefers stagnant and slow-moving water and hence by adding an aeration system duckweed can be eliminated or limit the growth to the edges which are easily reachable with a hand net.</p>
Nov 27th 2023	Has an aeration system been introduced? Has the water circulation in the wetlands been reactivated? Exhibit 23 , Exhibit 26 and Exhibit 30
6.3.7 Management of Hydrilla (<i>Hydrilla verticillata</i>)	
Nov 2020 EMPP	<p><i>Hydrilla verticillata</i> or Water thyme is a submerged, perennial aquatic plant listed as the “world’s worst invasive aquatic plant”. Dense infestations of hydrilla can shade or crowd out all other native aquatic plants, alter water chemistry, cause dramatic swings in dissolved oxygen levels, increase water temperatures and affect the diversity and abundance of fish populations. Unfortunately, once hydrilla infests a water body, it is difficult and very costly to eradicate. The best method of controlling hydrilla is preventing new infestations through public outreach and education.</p> <p>Physical management: Hydrilla can be removed by raking or seining it from the wetland, but will re-establish from any remaining roots.</p>
Nov 27th 2023	It would appear some attempts with workers on a small boat using rakes to collect Water Thyme piles and then depositing at the edge of the wetland have been undertaken. What are the results so far? Exhibit 23
Nov 2020 EMPP	<p>Biological management: Grass carp can be introduced to control aquatic vegetation although it may take over a year to observe any noticeable difference. Grass carp readily consume weed thus controlling it. It is recommended to use only triploid grass carp which are reproductively sterile and a permit from the Biosecurity Agency will be required before they can be imported into the country.</p>
Nov 27th 2023	Are there any plans to introduce grass carp?
6.3.8 Management of Water hyacinth (<i>Eichhornia crassipes</i>)	
Nov 2020 EMPP	<p>Water hyacinth is a freshwater invasive plant which floats on the water surface forming dense mats which can block waterways, hindering flood control, prevent sunlight from reaching underlying water, killing native submerged plants. The dense mats also serve as a breeding ground for mosquitoes.</p> <p>Physical management: Water hyacinth can be removed by raking or seining. The plants are then chopped into small pieces for disposal. It can also be composted to be used in the garden or rehabilitation programme.</p> <p>Chemical management: Contact herbicides like Endothall (dipotassium salts) and Reward (a diquat formulation) can be used to control water lettuce.</p>

Nov 27th 2023	What attempts have been made to control the water hyacinth?
6.3.10 Manage the dense Freshwater fern area to improve hydrology and biodiversity	
Nov 2020 EMPP	The Freshwater fern (<i>Acrostichum aureum</i>) is a large understory fern that occurs in mangrove forests and other wetlands. The distribution of Freshwater fern is associated with areas having lower salinity, frequently protected from tidal influence by growing in the landward ecotone or on slightly elevated ground. Prior to the control of the freshwater fern, it is important to better understand the distribution of the fern and determine where its removal will have the biggest positive impacts. It may be necessary to trap and temporarily remove the freshwater terrapins to reduce impact on them during the operation.
Nov 27th 2023	In Sept. 2023, a workforce was observed trying to remove freshwater fern from a central part of the wetland. Was there any effort to trap and temporarily remove the terrapins?
Nov 2020 EMPP	Control measures The Freshwater fern can be controlled through physical removal. The fern can be dug out or its fronds can be continuously cut to reduce growth. The ferns should then be disposed properly such as on a composting site. Areas along the main channel with major flows and near the culverts under the roads should be targeted in instances where hydrological flows need improving. Removal should be done in small patches of 10 m ² to reduce environmental impact. The patches should then be replanted with appropriate species such as reeds (<i>Typha javanica</i>), Chinese waterchestnut (<i>Eleocharis dulcis</i>) and Mangrove species (e.g. Red mangrove, Black mangrove, Oriental mangrove).
Nov 27th 2023	Have such areas where removal took place been replanted?
6.3.11 Replant and manage the beach crest and plateau along the coast	
Nov 2020 EMPP	The beach crest is in good condition and consists of native species. It is a habitat that is extremely important for the two nesting turtle species. The main plant species are Veloutye, Takamaka, Bwadroz, Pors e, Coconut, Bwa blan, Bodanmyen, Bonnen kare bordemer and Casuarina. There are however, disturbed patches in the beach crest vegetation created by footpaths for beach access. These footpaths will have to be vegetated with the appropriate species like Veloutye, Bwa savon and the Morning glory (Patatran).
Nov 27th 2023	Have any of these damaged patches and footpaths been re vegetated?
Nov 2020 EMPP	Considering the effects of climate change, which leads to beach erosion, there might be a need to first line the targeted areas with geotextile mats to hold the substrate and then plant the seedlings in the mat.
Nov 27th 2023	Have geotextile mats been used?
Nov 2020 EMPP	The Plateau behind the beach crest is in need of re-vegetation with appropriate species like Takamaka, Bwadroz, Porse, Bwa blan and Bonnen kare bordemer.
Nov 27th 2023	A lot of tree cutting and clearing behind the beach crest seems to have taken place (especially in front of the new owners villa). What has or will be replanted in these locations?
6.3.12 Train and enhance rehabilitation skills and knowledge	
Nov 2020 EMPP	The implementation of the R & M plan will need to be done and guided by an experienced team. The team should also provide training to hotel staff, the community and other interested parties for the long-term sustainability of the rehabilitation programme. Training in: o plant propagation techniques,

	<ul style="list-style-type: none"> o planting techniques, o pesticide management, o IAS management, o ecosystem recovery monitoring, biodiversity and water quality monitoring, are some examples of the trainings. 	
Nov 27th 2023	What are the qualifications of the team and what training has been and is being carried out?	
6.3.13 Enhance public awareness		
Nov 2020 EMPP	Public awareness can play a major role in environmental protection and management. It would be important to raise the awareness of the clients of the activities being undertaken to improve environmental conditions at the hotel. This may create more interest from the clients to contribute to rehabilitation as well as conservation efforts.	
Nov 27th 2023	The former management made an effort to get guests and the local community involved in the terrapin and turtle conservation and rehabilitation center. They provided a corresponding educational component in conjunction with the MCSS. At the moment there seems to be no effort to reactivate any of this. Why? What are the plans?	
7 IMPACT AND MITIGATION MEASURES AS PER DEVELOPMENT ZONE		
7.1 Beach Villas		
	Negative Impacts	Mitigation Measures
Nov 2020 EMPP	1. Washing away or spillage of construction materials onto the beach and marine environment during heavy rain season.	Building materials shall be transported in appropriate proportion/ quantities depending on pace of construction to prevent accumulation of construction materials near coastline which may lead to beach and marine pollution in the event they are accidentally deposited to the beach environment by adverse weather conditions. Only Minor Wet works will be allowed subject to Engineer/Contractor needs
Nov 27th 2023	There used to be a huge pile of soil and rocks in front of the new owner's villa and very close to the beach. Supposedly now having been used to elevate the foundation of this five-bedroom villa. What precautions were taken to avoid seepage during adverse weather conditions? The whole public access footpath during periods is now covered with beach sand – some distance from the beach. Is the elevation adequate? Exhibit 24	
Nov 2020 EMPP	3. Vegetation removal (tree felling) for the purpose of building two new beach villas south to existing beach villas and diverting of existing public beach access to closer proximity of wetland estuary.	The area is of tall casuarina tree dominant, for safety reasons most of the tall tree in close proximity to proposed villa will be removed and where appropriate native trees/ plants will be planted as part of final landscaping plan. Access to Public will not be denied but discreet security will ensure safe usage of beach frontage during construction period.
Nov 27th 2023	Was there/is there any discreet security being provided?	
Nov 2020 EMPP	4. Hawksbill nesting season is between October to March. Both nesting and hatching turtles are extremely sensitive to light, which is how they navigate safely back	Ideally, all demolition and renovation of the infrastructure near or along the beach should take place outside of the Hawksbill nesting season (October to March).

	to sea. Artificial lights thus disorient them, causing them to get lost or stuck in developed areas, which, frequently in the case of hatchlings, leads to mortality.	
Nov 27th 2023	Was this observed at any time during the last three years of construction as far as beach front construction being stopped during the nesting season?	
Nov 2020 EMPP	4. continued	As nesting Green turtles, as well as emerging Hawksbill hatchlings, may use the beach outside of that period, it is recommended that a barrier is erected for the mitigation of noise, debris and anthropogenic disturbance to nesting turtles, as far back on the beach as possible, well behind the vegetation and high-water mark. It is recommended that all employees involved in the demolition and renovation works are sensitized on the correct conduct in the case of turtle encounters.
Nov 27th 2023	Was any such barrier put in place? Clearly, the green mesh would not meet the above outlined protection criteria.	
Nov 2020 EMPP	4. continued	No artificial light should be visible from the beach during demolition and construction.
Nov 27th 2023	How will the light pollution be controlled once all the new structures are occupied?	
7.2 Hill Villas and Tennis court Zone		
	Negative Impacts	Mitigation Measures
Nov 2020 EMPP	2. Removal, felling and pruning of some mostly exotic trees / vegetation, to allow space for erection of new pillars for villa extension.	Limited tree clearing shall be done to preserve natural beauty. Only trees that will fall in the new proposed extension footprint that will be removed or trimmed but this will also be done carefully as to keep site camouflaged from visual impact from ocean view. There will be no mass tree removal on hills and strict adherence to biodiversity guideline shall be maintained.
Nov 27th 2023	The new presidential villa now has a much larger footprint and a large new lap pool in front. This is the opposite of camouflaging the site from visual impact. How was this authorized?	
7.3 Wetland		
	Negative Impacts	Mitigation Measures
Nov 2020 EMPP	1. Disturbance of existing wetland eco-system due to introduction of foreign materials into the wetland environment for reclamation purposes. Reclamation of wetland may result in sedimentation pollution of coastal line and marine environment.	NO RECLAMATION/BACKFILL to be allowed in Wetlands. All Pillar works shall be Pre-Cast to avoid any wet works in Wetlands Periphery. Install sedimentation trap, desilt and unblock wetland outland as required by the contractor during construction.
Nov 27th 2023	It would appear that reclamation backfill was carried out in front of the former Lamar Restaurant. On what basis was this authorized? Exhibit 25	
Nov 2020 EMPP	1. continued	Both ECO and MCSS to be alerted for any Species relocation/ capture release programs as needed.

Nov 27th 2023	Were there any such relocations attempted? Based on third party knowledge, no such major capture operations have been attempted or succeeded since 2020.	
Nov 2020 EMPP	3. Reduction in the width of wetland which may increase risk of flooding during heavy rainfall and extreme high tides. This is minimal but given the length of the wetland it can cause harm if not properly managed.	Long Term potential for Re profiling / de-silting of wetland to increase depth to cater for maximum flow of water as the wetland width will slightly narrow during the proposed minor reclamation. This will minimize and prevent risk of flooding during heavy rainfall and extreme high tide. Back Farm Zone together with Staff Accommodation zones are hydrologic low points and in need of raising and placement of proposed Culverts connections within the Storm water management plan
Nov 27th 2023	Water flow in the wetlands has pretty much come to a standstill even during the heavy rain period in Sept 2023. The overflow under the main road seems to have completely dried up and there is no longer any connection between the creek outflow and these concrete culverts that was in the past the main conduit for the water overflow from the wetland. Exhibit 26	
Nov 2020 EMPP	4. Loss of existing flora on the wetland banks (flora will have to be removed to gain access to the wetland edge for the purpose of reclamation. In most areas of the wetland banks the vegetation are of mixed-woodland type consisting of exotic and native plant species and doesn't not allow easy access to the wetland banks for cleaning and fauna monitoring.	Minimal removal of flora as the originally proposed wetland reclamation has been cancelled thus vegetation loss will be minimal which will also be rehabilitated by planting native wetland species as far as practicable in areas where flora loss has occurred for the purpose of the minor proposed backfilling.
Nov 27th 2023	Despite the cancelled wetland reclamation, in what way did digging up large chunks of the wetland avoid the loss of flora species?	
Nov 2020 EMPP	5. Disruption of existing wetland habitat and existing animal species breeding sites. Negative impact on species breeding sites definitely impacts on the protected species population growth rate which if not adequately protected may result into complete loss over time.	Work in wetland shall be done during the dry season which is from April to November where terrapin nesting and breeding activities are minimal. This will ensure continuous population growth of this highly sensitive species and prevent loss.
Nov 27th 2023	What is the present census data for these species?	
Nov 2020 EMPP	5. continued	Both species of terrapin require both aquatic and terrestrial areas (sandy soil, in particular) for both nesting and aestivation, and as such, natural banks along the wetland should be preserved and stabilized
Nov 27th 2023	From aerial photographs, it would appear that large sections of the wetlands behind the beach villas have been stabilized with new rock/concrete formations. Is this correct? What happened to the concept of instead having erosion vegetation to help with terrapin conservation?	
Nov 2020 EMPP	6. Affects the flow in wetland and cause stagnant water accumulation which may lead to aqua-pest breeding sites like mosquitoes which can cause transmission of deadly diseases like dengue fever.	Periodically desilt and unblock wetland at identified stagnant point to allow continuous flow thus eliminates the risk of insect/ pest breeding in stagnant water. Periodic monitoring of wetland will be done to ensure constant flow and circulation of wetland.

Nov 27th 2023	Has there been or is there now any circulation of water in any part of the wetland? If not, why not?	
Nov 2020 EMPP	7. The original concept plan was to have island in wetland completely removed. This would have had a major catastrophic effect of the wetland biodiversity by significantly increasing water turbidity, increased sedimentation into wetland which would result in direct wetland biodiversity loss. Killing of terrapin and wetland fishes would have been inevitable.	The concept of removing the island has been declined and new proposed plan is to only perform exotic vegetation clearing of the island and rehabilitate the island with native vegetation species.
Nov 27th 2023	Has this been done?	
Nov 2020 EMPP	8. The wetland consists of only 1 sea outfall outlet, which is found at the start of the main Intendance beach. The outlet is constantly blocked as a result of beach sand intrusion and accumulation.	In order to optimize the flow at the outlet, it is recommended that a raised sluice gate system be installed such that same can be operated manually. Onus shall be on the developer to ensure the adoption and operation of the sluice gate during significant precipitation events. During construction phase however, the outlet shall be modified to a sediment trap system that allows sediment to settle at the bottom of the trap and water to flow out. This is of utmost importance to prevent soil contamination of the pristine beachfront of the area.
Nov 27th 2023	Has this sluice gate been installed? What happened to the original sluice gate installed years ago to improve circulation? Exhibit 22 and Exhibit 26	
7.4 Construction of Kids club, Gym and Reception		
	Negative Impacts	Mitigation Measures
Nov 2020 EMPP	2. Pollution of wetland by construction wastes generated from the construction of the new amenities.	Provide and install sedimentation or waste trap alongside wetland where construction is to be done. Daily monitor waste management near wetland and ensure waste generated from construction at wetland areas are properly managed and disposed-off appropriately without risk of pollution to wetland environment.
Nov 27th 2023	Were sedimentation/waist traps installed? Was the daily monitoring of waste disposal near the wetland carried out? What about the sewage disposal from the senior staff quarters and then new workers accommodation?	
7.5 Common Impacts at Beach area, Hill area and Wetland		
	Negative Impacts	Mitigation Measures
Nov 2020 EMPP	2. Excessive noise emission from drilling equipment and other plant that will be used to facilitate demolition activities.	Drilling equipment and other heavy equipment shall be selected taking into consideration, average permissible noise emission level which should comply with the Local environmental noise acceptable limit. Demolition shall be done strictly during day time. Mainly between 8-am – 5pm from Mondays to Saturdays and 8am-1pm on Sundays. Noise monitoring shall be conducted periodically to assess and monitor noise emission level and

		in the event that excessive noise level is detected according to set environmental noise emission level, appropriate noise attenuation actions will be taken to resolve the issue. This may be done by providing noise screening to equipment, substitution of noise emitting equipment and review of work process.
Nov 27th 2023	What noise attenuation actions were added to this process? Exhibit 27	

Communications tower		
Nov 27th 2023	Who authorized the new communication tower near the Residence. Were the national policy guidelines in terms of consultation followed? See Exhibit 28 , Seychelles law on “ Communications Tower Antennae Policy 2018 ”, and letter about communications tower (“ Letter to Mr. St. Ange -Request for Information (31.01.2023) communications tower ”).	

9. HEALTH, SAFETY AND ENVIRONMENTAL RISK REGISTER & RATING

Health, Safety and Environmental Risk Register & Rating For Proposed Demolition and Construction of Ex-Banyan Tree Resort									
Activities	Environmental / Social Impact	Health and Safety Hazards / Risks	Who will be Impacted	Likely hood	Severity	Impact / Risk Level	Preventive Measures	Impact / Risk level after Mitigation Measures	Monitoring
Pre-Construction Stage (ESIA and Survey Phase)									
Scoping visits	Conflict with local residents/ disturbing residents/ Illegal entry on private premises	Trespassing /Alienating Community/ Animal or insect bites	Human	2	2	Moderate	Identify presence of zoological and insect hazards and prevent access to areas of possible threat by animals and insects. Approach residents for scoping in a professional manner with letter/adverts /radio announcement, good knowledge of all the required updated information pertaining to the project.	Low	Record Scoping forms of Local residents comments and acceptance of the project.
Nov 27th 2023	Never received any feedback to the attached scoping feedback								
Demolition of existing hotel structures	Pollution of land / wetland and marine environment during demolition of existing sewer network	Bacterial contamination and parasitic infestation / Foul Smells /	Land / Wetland/ Marine environment / Human	3	3	Moderate	Clean and disinfect existing sewer network prior to demolition, pump any residual sewerage content by an approved cesspit emptier and dispose at PUC sewerage treatment plant	Low	Periodic monitoring and recording (monthly) of wetland water parameters (water level, water temperature, light intensity and water quality) is recommended to ensure the health and

									function of the wetland ecosystem Water quality reports for bacterial content
Nov 27th 2023	Can these MONTHLY water sampling results be provided to compare to the two independent ones (“2023 06 27 Lab results of water samples taken from the Wetland”)								
Demolition of existing hotel structures	Visual and aesthetic impact		Land Environment	3	3	Moderate	Hoarding of site with environment blending materials or fabric in regards to Public Access zone, Coastal Frontage.	Low	Visual impact complaints/ Monitor Access impeidments if any to Beach Users/ Moniator Hoarding condition/Tears
Nov 27th 2023	How many visual impact complaints have been received? Aware that some tourists wrote to the ministry of tourism.								
Demolition of existing hotel structures	Damage to existing native and endemic vegetation and natural habitat	Falling trees or heavy branches causing body injuries to workers on site / Overhead Tree Prunning accidents	Land / Flora / Fauna	3	3	Moderate	Remove and rehabilitate protected vegetation (Plants) in areas of lower risk of damage / Installing of tyre rings around non-removable tree trunks to prevent damages by heavy machinery working on site/ Tag system of all Protected trees with Fine system in palce for illegal felling/	Low	Number of trees and plants to be rehabilitated and protected/ Numbr of Tags recovered after Demoliltion / Recontruction / New number of trees introduced on site
Nov 27th 2023	Can we get a listing/photographs for the tags recovered?								
Demolition of existing hotel structures	Noise pollution / dust emission / visual impact of demolished buildings / sedimentation of dusts into wetland and marine environment / Air quality degradatation	Noise nuisance / inhalation of harmful dusts / respiratory diseases / risk of rolling boulders and uncontrolled collapse of structures (potential to cause severe injuries & fatalities)	Human / Air / Fauna / Flora	3	3	Moderate	Existing hotel structures demolition should be done according to best environmental protection methods and best code of practice as set in the EIA / communicate and warn the community on demolition schedule including timing / use of water spray during concrete building demolition to minimize the amount of dust generated / Demolition work should be done on specified days and times as to minimize nuisance effect on the neighboring inhabitants / Drilled and broken rocks should be stacked in appropriate manner in designated area without risk to general public and employees on site	Low	Periodic noise and dust emission monitoring / Number of excessive noise and dust complaint
Nov 27th 2023	How was this done? Are there records of monitoring? How were complaints dealt with?								
Transportation of Construction waste from building demolition activities to	Increased heavy traffic movement may lead to road congestion and damage of existing community road /	Noise / Heavy vehicle incident	Land / Human/ Air	4	3	High	Transportation of construction materials to be done during the day (preferably weekdays from 8.30 - 3.00 pm) where most people are at work and students at school and traffic movement is low on the road. Signage and appote spedd limiting	Low	Traffic movement monitoring / Vehicle incident log / Land transport and road users complaints/ Final Road Surface Audit by Engineers

damping site by heavy vehicles	Habitat disturbance						along the main access road /Check Poitns at Gate for Speed and truck laoding/		
Nov 27th 2023	When will the final road surface audit be available? Including up to the residential development of the resort?								
Transportation of Construction waste from building demolition activities to damping site by heavy vehicles	Spill over of demolition wastes from site onto road / emission of dusts from construction materials onto the road surrounding environment	Road Blockages / Damages to incoming traffic / Excess burden on SLTA - Road Cleaning and resurfacing / Vehicular incident causing body injuries	Land / Human / Air / Water	3	3	Moderate	All major transportation vehicles to be periodically inspected for compliance / All loading sources to be done in respect to carrying tonnage / special watering of finer materials / Prior Drivers awareness session on load transportation and defending driving / Vehicles should have suitable cover on cargo deck to prevent spillage of construction debris and emission of construction waste dusts into the environment	Low	Recording Weighing Bay receipts for loads / Inspection of load upon entry to site / Recording non-compliance / Appraisal of Attendance at awareness
Nov 27th 2023	Can these load weighing records be provided? The records of non-compliance. E.g the construction lorry which on the way to site mowed down a power pole resulting in a 7-hour power cut to the whole area.								
Transportation of Construction materials to site for new proposed development by heavy vehicles	Destabilization and damage to existing road surface	Vehicular incident / Access road damage / Injury to Drivers and other road users / Vehicle damage	Land / Human	5	3	High	Safe demarcated routes for vehicles on site / experienced drivers / Traffic management on site / Road access Assessment prior to construction / selection of vehicles with suitable tonnage for transportation of construction materials	Low	Stability of ground, roads and bridges / vehicular incident Log Book
Nov 27th 2023	Can the vehicular incident logbook be provided?								
Transportation of Construction materials to site for new proposed development by heavy vehicles	Increased heavy traffic movement may lead to road congestion and damage of existing community road / Habitat disturbance	Noise / Heavy vehicle incident	Land / Human/ Air	4	3	High	Transportation of construction materials to be done during the day (preferably weekdays from 8.30 - 3.00 pm) where most people are at work and students at school and traffic movement is low on the road	Low	Traffic movement monitoring / Vehicle incident log / Land transport and road users complaints
Nov 27th 2023	Have complaints been received from the community living on the main access road be provided?								
Transportation of Construction materials to site for new proposed development	Increase in emission of harmful exhaust gas into the environment	Air-borne health effects of human and other animals (e.g. birds) / toxification by air pollutants	Human / Fauna	4	3	High	Selection of appropriate vehicles, (adequately maintained and mechanically fit vehicles) / Vehicles to be serviced and tested before start of construction contract and periodically serviced during construction (applies to heavy machinery and plants on site too)	Low	Exhaust gas emission status

by heavy vehicles									
Nov 27th 2023	It seems that the public parking area is at capacity and there is serious air pollution from the construction site. Were the vehicles serviced and tested prior to start of construction? Could a log of such testing and selection of appropriate vehicles be provided? Exhibit 29								
Construction of new proposed development	Generation of construction waste impacting on land waste management capacity / pollution to the environment / Habitat deterioration	Injuries to human / attracting pests, vermines which are likely to cause or spread diseases (e.g dengue fever from mosquitos breeding in stagnant water due to waste accumulation on site, leptospirosis from rodents activity if wastes not adequately managed)	Land / Human / Air / Water	4	3	High	Provision of adequate waste receptacles and waste collection point / Effective waste removal contract / emphasis on green waste recycling and use of biodegradable materials on site/ using stock piles based on rate of construction / implementation of a recycling culture / Waste management awareness to site workers / All waste not recyclable should be disposed off on designated landfill as per land waste management protocols / Periodic audit of waste management system	Low	Amount of waste being generated / frequency of waste collection / amount of waste accumulation of site / Appraisal of Pep Talk Attendance / Effectiveness of waste management awareness / Photography evidence of waste accumulation during Env Audit / Actions taken for Non compliance of waste management on site
Nov 27th 2023	Can the data on the waste generation and effectiveness of waste management be provided?								
Construction of new proposed development	Accumulation of surface run off water in excavated utility trenches and drains which may spill over and pollutes wetland downstream and eventually beach and sea / Biodiversity disturbance / Loss of habitat	Breeding sites for mosquitoes and other water-borne disease vectors / fall from height hazards into trenches causing injuries	Water / Human / Land	3	3	Moderate	All opening in grounds must be adequately identified and protected to prevent fall into the trenches / water accumulated in trenches and in ground hole should be used as much as possible in construction process and cleaning of vehicles and tools / Sedimentation traps and ponds should be installed to prevent spill over of polluted and dirty run off water from upstream to downstream towards the wetland, beach and eventually sea causing habitat pollution and biodiversity migration and destruction.	Low	Level of accumulated water in the trenches and in in ground holes / signs of dirty surface water pollution of beach and marine environment/ Water Quality Assessment and comparison to Baseline values
Nov 27th 2023	What water quality assessments of the different water bodies were done? Exhibit 30								
Construction of new proposed development	Generation of effluent and waste water from workers sanitary activities / possible sewerage spillage on site / Habitat pollution	Bacterial contamination and parasitic infestation / Foul Smells /	Land / Human/ Air / Water	4	3	High	Provision of suitable temporary sanitary conveniences / 1 toilet for each 10 employees on site / These facilities should be located away from the water course as to prevent water contamination / Effective and safe sewerage collection and disposal treatment system for construction phase to be installed / permitted by Public health	Low	Effectiveness of effluent discharge and treatment system / Monitor effluent quality as per Environmental Protection Act / frequency of effluent testing and recording of results/SBS and Public health audits
Nov 27th 2023	How many public/SBS health audits were done? Can the results be provided?								

Construction of new proposed development	Spillage of petroleum products used by heavy machinery on site / Habitat pollution / Loss of biodiversity	Fire and petroleum product poisoning	Land / Water / Human / Fauna / Flora	3	3	Moderate	Ensure all heavy machinery and vehicles are road worthy. All maintenance and repair on vehicle or machinery should be done in a designated workshop area by competent personnel's. All waste oil should be properly stored and incinerated accordingly off site by suitable hazardous liquid waste disposal firm / Emergency action procedure drafted for such spillage (periodic drills should be done on site to keep employees abreast of the emergency action procedure	Low	Daily monitoring to identify any source of leak from the heavy machinery. Recording of non-compliance / records of action taken against spillage / SOP modification according to each event
Nov 27th 2023	Are these inspection reports available?								
Construction of new proposed development	Washing away of construction materials into the environment, river by heavy rain eg. Crusher dust, cement / Habitat pollution	Contamination of water environment / Impact and loss of biodiversity and affecting neighboring inhabitants	Water / Human / Land / flora and fauna	2	3	Moderate	Demarcated area for stacking construction materials / well protected from storm water passage / adequate storage bunding / preventative drains around stock piles / emergency action procedure drafted for water way protection during spill / use of hoarding, netting and other sedimentation mitigation measures on site	Low	Inspection / monitoring of marine environment in the vicinity of project to identify signs of pollution / River eco-system status / Ensure stock pile is watered down during heavy winds / ensure drain gutter remain free of sediments /
Nov 27th 2023	Are inspection reports of the marine environment in the vicinity of the project available? Can they be provided?								