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ENVIRONMENTAL MANAGEMENT PLAN

SUMMARY OF KEY SOCIAL ISSUES

BRANDVALLEY, KAREEBOSCH AND RIETKLOOF WIND ENERGY FACILITIES AND ASSOCIATED GRID INFRASTRUCTURE

WESTERN AND NORTHERN CAPE PROVINCE

OCTOBER 2021

1. INTRODUCTION

The comments are based on observations during the site visit to the study area in September 2020 undertaken as part of Social Impact Assessments (SIA) for powerline associated with the Kareebosch WEF. Interviews and discussions were held with a number of land owners and community members affected by the proposed powerline. In addition, the affected landowners provided insight into their experience with the construction phase for the Roggeveld, Karusa and Soetwater WEFs. Additional information was obtained from attending a public participation meeting associated with the proposed Kolkies and Sadawa SEF. Most of the attendees at this meeting were land owners in the vicinity of the existing Paardekraal East WEF and the discussion was largely focused on visual impacts associated with WEFs. The issues raised are also likely to be relevant to the Kareebosch, Brandvalley and Rietkloof WEFs given the location of these facilities within the Komsberg REDZ. The key issues raised are summarised below.

2. POSITIVE IMPACTS

- A number of interviewees indicated that the ongoing construction of WEFs in the Komsberg REDZ has had a significant positive impact on the local economy in the area, specifically the town of Sutherland. The benefits associated with providing accommodation for contractors in Sutherland and on surrounding farms has enabled the local hospitality sector and farmers to survive the impact of COVID-19 and the recent major drought. The construction activities have benefited the local hospitality, retail, and services sector.
- The benefit to the Sutherland and Laingsburg economies is expected to continue for some time given the number of projects planned in the Komsberg REDZ.
- For a number of farmers, the WEFs have been a life saver, effectively ensuring the continuation of farming operations which may have folded due to the drought.

3. COMMUNICATION

Communication and the need for early, effective and on-going communication and engagement was identified as a key issue.

- Many directly affected land owners indicated that good, clear, and on-going communication was a key requirement for addressing and managing impacts.
- Experiences differed between projects. However, it would appear that the initial communication and interaction with individual landowners has been poor and that this has impacted on communication and interaction going forward.
- There is a need for developers / contractors to identify a dedicated project go-to person who can be reached at short notice to report incidents or address problems.
- There is need to keep landowners, authorities, and the public updated and informed about activities with regular updates throughout construction phase.
- The failure of contractors and contract workers to inform farmers and report incidents regarding damage to farm gates, boundary fences and other farm infrastructure was raised as a key concern on all of the projects being established in the area. The onus is then placed on the landowner to check up on contractors. This is time consuming and can also lead to conflicts and arguments.
- Some land owners reported the following negative experiences when they reported issues or problems:
 - The issues were treated as inconvenience by the contractors (i.e., were not taken seriously).
 - Issues were down played. Issues such gates being left open, damage to fences, littering, unnecessary damage to veld, etc., were regarded as petty complaints as opposed to serious concerns. In this regard there was a lack of understanding of severity of impacts on farming activities and the livelihoods of the affected landowners.
 - Adversarial attitude: One landowner felt that whenever he raised issues the response was formal and adversarial, instead of being open, understanding and trying to find a solution to the problem.
 - Deferral of responsibility. One landowner was told to monitor damage to gates and fences himself.

4. IMPACTS ON FARMING AND NATURAL AREAS

- All the affected landowners indicated that they did not expect the disturbances to be as extensive as they turned out to be and felt that excessive areas of land were cleared / disturbed during the construction phase. The disturbances were linked to access roads, turbine laydown areas, soil dumping, off-road driving, etc. The landowners affected by the Karusa and Soetwater WEFs and neighbours were all struck by excessive impacts compared to agreed-upon/ anticipated impacts, especially in more remote portions of properties where oversight was more difficult. Some farmers indicated that that entire hilltops levelled and cleared 'like landing strips'.
- Farm gates damaged or left open and damage to fences. This was a common experience on all projects. The impacts associated with leaving farm gates open include time spent recovering livestock, increased risk of stock theft and predation etc. These impacts were often exacerbated by failure to and or delays by the contractor in reporting incidents, resulting in valuable time lost in rectifying the problem.
- Failure to report damage to boundary fences. A number of land owners indicated that incidents on their properties were left unreported – at least one land owner was advised to do regular boundary line checks himself, a time-consuming activity
- Crime and security. No major incidents were reported directly linked to WEF construction workers. One owner did however have trouble at the outset with taxis being used to supply alcohol and narcotics from town to local farm labourers. Some owners also indicated distrust in the security services employed. Concern was that they provided information onto people involved in stock theft etc.

- Stock theft: No incidents involving construction staff were reported. Some properties experienced incidents linked to local farm workers exploiting the cover of construction activities. Many owners have however pointed to the difficulty of establishing stock theft incidents on extensive properties due to gates being left open or fences damaged, and especially if incidents are left unreported. Pressure from the Tankwa Karoo Farmers Association resulted in the operators of the Perdekraal East to install cameras with night-vision and number-plate recognition capabilities at key points (e.g. site or farm entrances). This may need to be considered for the construction of the Kareebosch, Brandvalley and Rietkloof WEFs.
- Compensation for losses associated with need to reduce and or relocated livestock during construction was identified as an option. However, the option of leasing grazing in the region may become scarcer due to competition from various WEFs in the REDZ and the impact of the drought and climate change. One affected landowner indicated that farmers had to travel further afield to find alternative grazing. This resulted in increased transport costs.
- Impact on the Komsberg Road (Karusa, Soetwater): The road was reasonably maintained, but only the portion up to the northern entrance to the Soetwater WEF. The developers maintained that the balance of road was a public road and was not impacted by construction traffic. However, they did not consider the large number of minibus taxis and bakkies that transported workers in and out from Sutherland every day. Need to consider cumulative impacts from other projects in the area, such as Kareebosch, Brandvalley and Rietkloof WEFs.
- Littering: The key issue of concern is potentially fatal ingestion by livestock. Appears to have been managed reasonably well, although some owners discovered isolated incidents. Timing of reporting and addressing issue a key factor as in case of damage to farm gates etc. Again, the issue is making contractors aware of implications. Littering is not simply a neatness issue, but one that can have significant economic implications on farmers livelihoods due to stock losses.
- Interaction with farmworker staff: Owners indicated that they experienced no issues in this regard. This is largely linked to limited contact between the relevant parties on the large properties and Covid-19. Limiting interaction with taxi crews seems to be a factor in limiting the potential flow of contraband onto farms.

5. IMPACTS ON LOCAL COMMUNITIES

- Representatives at the Sadawa meeting indicated that Sexually Transmitted Disease (STD) infection rates in Sutherland had increased significantly and this had placed pressure on local medical services.
- Also reported that teenage and unplanned pregnancies in Sutherland have increased.
- Rental accommodation in and around Sutherland has become scarce and expensive for locals.
- Tourist accommodation in and around Sutherland has been largely booked out to consultants, contractors, etc, thus reducing the availability for visitors. This may impact on the tourism potential of the town. The impact is expected to last for a number of years given the number of projects proposed in the Komsberg REDZ. However, as indicated above, the economy of Sutherland has benefitted significantly from the construction phase and is expected to continue benefitting.
- Perception with Paardekraal East is that the benefits to the local farming community in the area, as opposed to Witzenberg Municipality, has been limited. It is felt that a start could be made by the WEF at least joining the Tankwa Farmers Association and behaving like a part of the community. Similar concerns may develop with projects located in the vicinity of Sutherland and Laingsburg, such as the Kareebosch, Brandvalley and Rietkloof WEFs.

6. VISUAL AND SENSE OF PLACE IMPACTS

- The sense of place in the Klein Roggeveld portion along the Komsberg Road has significantly altered.
- Civil aviation lights: This was the key issue discussed at Sadawa meeting. Local landowners indicated that the impact on the night sky was a major concern. There is a proposal to see if the CAA and Paardekraal East will agree to retrofit the lights with an aircraft activated system. This approach should also be considered for other WEFs in the Komsberg REDZ, such as the Kareebosch, Brandvalley and Rietkloof WEFs.
- Directly affected owners appear to have resigned themselves to visual impacts as long as the major viewsheds from their farm houses are not affected.
- The disturbances are not only linked to the wind turbines but also to access roads and disturbances to the natural veld.

7. KEY RECOMMENDATIONS

7.1 Communication

- Early, clear, and effective communication with affected and adjacent landowners prior to and throughout the construction phase is critical. A detailed **Stakeholder Engagement Plan** should be developed prior to the implementation of the construction phase and should be developed in conjunction with the affected landowners and key stakeholders, such as local landowners, the local farming association and municipality.
- A **Grievance Mechanism** should be developed and implemented as part of the Stakeholder Engagement Plan.
- A **Monitoring Committee (MC)** should be established as part of the Stakeholder Engagement Plan. The MC should be made up of representatives from the affected landowners and key stakeholders, such as the local farmers, the local farming association, municipality and proponent.
- Communication should include regular updates and information sharing throughout the construction phase and be carried over to the operation and maintenance phase. The programme for meetings should be outlined in the **Stakeholder Engagement Plan**.
- A **Community Liaison Person (CLP)** should be appointed by the proponent at the outset of the construction phase. Ideally this person should be from the local community and his or her role should be to ensure that the **Stakeholder Engagement Plan** is implemented on the ground. The CLP should be involved in the development of the **Stakeholder Engagement Plan** and not merely appointed to implement the Plan. In this way he or she will have met with and engaged with the affected landowners and key stakeholders prior to the start of the construction phase and will have a good understanding of farming activities in the area and how these may be impacted by the construction related activities.
- Procedures and timeframes should be identified for reporting and addressing incidents, such as damage to gates and fences etc. Based on the comments from the affected land owners, it would appear that the role played by the **Environmental Control Officers (ECOs)** involved in the existing projects can be improved. The ECO and CLP should liaise closely with each other throughout the construction phase.
- The approach to responding to and addressing complaints or concerns should be sympathetic, open, transparent, and constructive. This would go a long way in maintaining good relations. In this regard the **Stakeholder Engagement Plan** should be informed by a set of engagement principles that support this approach.
- Contractor training. Contractor training must include making workers aware of the consequences of their actions and the impact that they may have on farming activities. A Contractor Training programme should be developed and implemented prior to the commencement of the construction phase. The programme should inform contract workers of the requirements of the **Stakeholder Engagement Plan** and

Environmental Management Plan and their roles and responsibilities in terms of these plans.

7.2 Impacts on local communities and the local economy

Based on comments the construction of existing renewable energy projects has benefited the towns of Sutherland and Laingsburg. However, the presence of construction workers has also impacted negatively on local communities. The recommendations contained in the SIA and the EMP do cover the potential measures to enhance the potential socio-economic benefits. These are outlined below:

Positive impacts

Employment

- Stakeholder engagement processes should be put in place to make sure that all interested and affected party have buy in in the process which will be designed and followed for employment and local procurement opportunities
- Where reasonable and practical, the proponent should appoint local contractors and implement a 'locals first' policy, especially for semi and low-skilled job categories. However, due to the low skills levels in the area, the majority of skilled posts are likely to be filled by people from outside the area.
- Where feasible, efforts should be made to employ local contractors that are compliant with Broad Based Black Economic Empowerment (BBBEE) criteria.
- Before the construction phase commences the proponent should meet with representatives from the Laingsburg and Karoo Hoogland LM to establish the existence of a skills database for the area. If such a database exists it should be made available to the contractors appointed for the construction phase.
- The local authorities, community representatives, and organisations on the interested and affected party database should be informed of the final decision regarding the project and the potential job opportunities for locals and the employment procedures that the proponent intends following for the construction phase of the project.
- Where feasible, training and skills development programmes for locals should be initiated prior to the initiation of the construction phase.
- The recruitment selection process should seek to promote gender equality and the employment of women wherever possible.

Business

- The proponent should liaise with the LM with regards the establishment of a database of local companies, specifically BBBEE companies, which qualify as potential service providers (e.g., construction companies, catering companies, waste collection companies, security companies etc.) prior to the commencement of the tender process for construction service providers. These companies should be notified of the tender process and invited to bid for project-related work.

The need to implement training and skills development programmes for locals and local service providers prior to the initiation of the construction phase is a key intervention. The benefits are three-fold:

- Firstly, it will maximise the potential employment opportunities for local community members and businesses.
- Secondly, it will assist the renewable energy companies to meet local employment and procurement targets.
- Thirdly, it will raise skills levels in the area and increase the economic mobility of the local community members and companies that benefit from the programme.

Negative impacts

Based on comments the presence of construction workers has had a negative impact on local communities, specifically in the small town of Sutherland. The local community in Laingsburg has also been impacted. The recommendations contained in the SIA and the EMPr do cover the potential measures to address the potential negative impacts. These are outlined below:

- Where possible, the proponent should make it a requirement for contractors to implement a 'locals first' policy for construction jobs, specifically for semi and low-skilled job categories.
- The proponent and the contractor(s) should develop a **Code of Conduct** for the construction phase. The code should identify which types of behaviour and activities are not acceptable. Construction workers in breach of the code should be subject to appropriate disciplinary action and/or dismissed. All dismissals must comply with the South African labour legislation.
- The proponent and the contractor should implement an HIV/AIDS awareness programme for all construction workers at the outset of the construction phase.
- The contractor should provide transport for workers to and from the site on a daily basis. This will enable the contractor to effectively manage and monitor the movement of construction workers on and off the site.
- The contractor must ensure that all construction workers from outside the area are transported back to their place of residence within 2 days for their contract coming to an end.
- No construction workers, with the exception of security personnel, should be permitted to stay over-night on the site.

Given the issues raised it is recommended that a **Development Forum** consisting of representatives from the Laingsburg and Karoo Hoogland Municipality and renewable energy companies involved in the implementation of projects in the Komsberg REDZ be established. The aim of the **Development Forum** would be to implement the measures required to address the potential negative impacts during both the construction and operational phase and enhance the potential opportunities.

Negative impacts

The impact of construction workers on local communities in Sutherland and Laingsburg is a key issue of concern and has been borne out by the experience with the construction of the Karusa and Soetwater WEFs. The impacts include increase in STDs and unplanned pregnancies. This has placed pressure on the local medical services in the town. There is currently no resident doctor in Sutherland and the existing medical and social services are limited. Most residents that require a doctor or treatment travel to the hospital in Worcester and have to rent a private vehicle in the case of emergencies.

Recommended that the renewable energy companies engage with the Western Cape Department of Health and local municipalities of to identify how they can contribute towards increasing the capacity of the local health services in the area, specifically in Sutherland. This may include covering the costs of appointing additional medical staff at the clinic and appointing more social workers.

Food security is also an issue, specifically with regards to young children and the elderly. The **Development Forum** should also look at the establishment and or support for community feed schemes.

Positive impacts.

The **Development Forum** should co-ordinate the planning and implementation of Social and Economic Development (SED) initiatives in the area, including the design and implementation of a co-ordinated, training and skills development programme that

involves and is supported by each of the different renewable energy companies as opposed to a series of separate, fragmented efforts.

In this regard the **Development Forum** would play a role during both the construction and operation phase of the renewable energy projects in the Komsberg REDZ. The option of establishing a Renewable Energy Training and Skills Centre facility in Laingsburg that would provide training and skills development to local community members and SMME's so that they can undertake construction related and maintenance and repair work associated with the renewable energy facilities located in the Komsberg REDZ should be investigated. This would represent a legacy project opportunity for the renewable energy sector that have projects in the Komsberg REDZ. The centre should be linked to a technical training college/ university to provided training and skills development. The focus should be on creating opportunities for members from the local community, with a focus on women and the youth.

7.3 Accommodation for construction workers

Meeting the accommodation needs for construction workers is likely to pose a challenge given the limited accommodation facilities available in the area, specifically in Sutherland. In addition, providing accommodation for construction workers will reduce the availability of accommodation for local residents, tourists and other visitors and business people to towns such as Sutherland, Laingsburg and Matjiefontein. Therefore, while the construction phase will benefit local hospitality industry, it also has the potential to impact negatively on local communities and other visitors who require accommodation.

Based on information for SIAs undertaken for WEFs the total number of workers associated with the construction phase for a single WEF project (depending on size) ranges from 300-600 depending on the stage of the construction phase. Of this total approximately 70 would be classified as skilled workers and 400-500 as semi-skilled and low-skilled workers. The construction phase for a single WEF project typically extends over a period of 12-18 months (depending on size).

Based on the assumption that 20% of the semi-skilled and low skilled workers can be sourced locally, the maximum number of semi and low skilled workers that will need to be provided with accommodation will be in the region of 300. However, due to the low education levels in the area it may not be possible to meet the 20% local employment target. The figure is therefore likely to be in the region of 400.

Therefore, for a single WEF project the total number of workers that would need to be accommodated would be in the region of 500. If more than one WEF is constructed, then this increases the cumulative impacts both in terms of benefits to the local economy and the hospitality sector, but also in terms of potential negative impacts.

The Laingsburg Municipality has indicated that they will not support the establishment of construction camps on private farms, such as was undertaken for the Karusa WEF. This reduces the economic benefits for the local towns in the area. However, in order to meet the demand for accommodation associated with the construction of WEFs in the Komsberg REDZ it may be necessary to establish a dedicated accommodation facility/s in Laingsburg for semi and low skilled workers. Based on initial meetings with the Laingsburg Municipality this proposal is supported.

Such a facility will enable proponents to provide quality accommodation that meets IFC worker accommodation requirements and standards. The establishment of a new accommodation facility will also create an opportunity to employ local contractors and meet local procurement and employment targets. The facility can also be handed over the local municipality and used for the establishment of Renewable Energy Centre (see above) or Community Centre.

In terms of recommendations, recommended that a meeting be set up with the with the Laingsburg and Karoo Hoogland Municipality to discuss accommodation requirements and the option of establishing an accommodation facility, including planning and rezoning requirements, bulk services, role of local contractors etc.

7.4 Impacts on natural and farming areas

The EMPr and SIA identify measures aimed at reducing the impact on farming and natural areas. These include:

Natural areas

- Ensure that lay-down and other temporary infrastructure is within low sensitivity areas, preferably previously transformed areas if possible.
- Minimise the development footprint as far as possible and rehabilitate disturbed areas that are no longer required by the operational phase of the development.
- All roads built for construction should have water diversion and erosion control structures present, especially in steep areas.
- Preconstruction environmental induction for all construction staff on site to ensure that basic environmental principles are adhered to. This includes awareness as to no littering, appropriate handling of pollution and chemical spills, avoiding fire hazards, minimizing wildlife interactions, remaining within demarcated construction areas etc.
- Demarcate all areas to be cleared with construction tape or similar material. However, caution should be exercised to avoid using material that might entangle fauna.

Farming areas

- The proponent should enter into an agreement with the local farmers in the area whereby damages to farm property etc. during the construction phase will be compensated for. The agreement should be signed before the construction phase commences.
- All farm gates must be closed after passing through.
- Contractors appointed by the proponent should provide daily transport for low and semi-skilled workers to and from the site.
- The proponent should consider the option of establishing a MF (see above) that includes local farmers and develop a Code of Conduct for construction workers. This committee should be established prior to commencement of the construction phase. The Code of Conduct should be signed by the proponent and the contractors before the contractors move onto site.

As indicated above, all of the affected landowners interviewed as part of the SIA indicated that they did not expect the disturbances to be as extensive as they turned out to be and felt that excessive areas of land were cleared / disturbed during the construction phase. In addition, farm gates damaged or left open, and fences were damaged. These impacts were often exacerbated by failure to and or delays by the contractor in reporting incidents, resulting in valuable time lost in rectifying the problem.

Based on the above it is recommended that more attention be provided to the planning and implementation of construction related activities to ensure that the impact footprint is minimised, and unnecessary disturbances are avoided. These measures should be clearly outlined in the EMPr.

Steps must also be taken to ensure that they are implemented on the ground. In this regard it would appear that the concerns related to extent of the disturbance and damage to farm infrastructure can be directly attributed to the actions of the contractors on the site. It is unclear if this is due to insufficient detail and or training provided to the

contractors prior to and during construction phase and or lack of effective oversight by the ECOs on the site.

As indicated above, a **Monitoring Committee (MC)** should be established. The MC should meet on a monthly basis to review construction related activities and ensure that the requirements of the EMPr are effectively implemented on the ground.