# **Appendix I**

## EMPR

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## Dalmanutha Wind (Pty) Ltd

## DALMANUTHA HYBRID ENERGY FACILTY

Draft Environmental Management Programme



### Dalmanutha Wind (Pty) Ltd

## DALMANUTHA HYBRID ENERGY FACILTY

### Draft Environmental Management Programme

**TYPE OF DOCUMENT (VERSION) PUBLIC** 

PROJECT NO. 41103722

**DATE: MAY 2023** 

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## QUALITY CONTROL

Issue/revision	First issue	Revision 1	Revision 2	Revision 3
Remarks	Draft EMPr			
Date	<u>May</u> 2023			
Prepared by	Thirushan Nadar			
Signature				
Checked by	Ashlea Strong			
Signature				
Authorised by	Ashlea Strong			
Signature				
Project number	41103722			
Report number	01			
File reference	\\corp.pbwan.net\za\Central_Data\Projects\41100xxx\41103722 - Dalmanutha WEF\41 ES\01-Reports\06-EIAr\EMPr			

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## GLOSSARY

Abbreviation	Definition
AEL	Atmospheric Emissions License
AIS	Alien and Invasive Species
ATNS	Air Traffic and Navigation Services
ВА	Basic Assessment
BAR	Basic Assessment Report
BWLM	Beaufort West Local Municipality
BESS	Battery Energy Storage System
BMS	Battery Management System
СА	Competent authority
CARA	Conservation of Agricultural Resources Act (No. 43 of 1983)
СВА	Critical Biodiversity Area
CKDM	Central Karoo District Municipality
CCIA	Climate Change Impact Assessment
DC	Direct current
DFFE	Department of Forestry, Fisheries and Environment
DWS	Department of Water & Sanitation
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
ECA	Environmental Conservation Act 73 of 1989
ECO	Environmental Control Officer
EGI	Electrical Grid Infrastructure
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme
EO	Environmental Officer

Abbreviation	Definition
EP	Equator Principles
EPC	Engineering, Procurement and Construction
EPFI	Equator Principles Financial Institutions
ERA	Electricity Regulation Act (No. 4 of 2006)
ERP	Emergency Response Plan
FI	Financial institutions
GA	General Authorisation
GHG	Greenhouse gas
GIIP	Good international industry practice
GNR	Government Notice Regulation
ha	Hectares
HWC	Heritage Western Cape
IBA	Important Bird & Biodiversity Area
ICAO	International Civil Aviation Organisation
IEP	National Integrated Energy Plan
IFC	International Finance Corporation
IRP	Integrated Resource Plan
KNP	Karoo National Park
LSA	Late Stone Ages
LUPA	Land Use Planning Act (Act 3 of 2014)
MR	Main roads
MSDS	Material Safety Data Sheet
NDP	National Development Plan
NEMA	National Environmental Management Act (Act 107 of 1998)
NEMAQA	National Environmental Management: Air Quality Act 39 of 2004
NEMBA	National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004)
NEMPAA	National Environmental Management Protected Areas Act (No. 57 of 2003)

Abbreviation	Definition
NHRA	National Heritage Resource Act (Act No. 25 of 1999)
NID	Notification of Intent to Develop
NPAES	National Protected Area Expansion Strategy 2010
NR	National Routes
NWA	National Water Act, 1998 (Act No. 36 of 1998)
O&M	Operational and maintenance
OHSA	Occupational Health and Safety Act (No. 85 of 1993)
PS	Performance Standards
PSDF	Provincial Spatial Development Framework, 2014
PV	Photovoltaic
REC	Recommended ecological condition
REDZ	Renewable Energy Development Zones
REIPPPP	Renewable Energy Independent Power Producer Procurement Programme
RFI	Radio Frequency Interference
S&EIA	Scoping and EIA
SABS	South African Bureau of Standards
SACAA	South African Civil Aviation Authority
SAHRA	South African Heritage Resources Agency
SAHRA	South African Heritage Resources Agency
SALA	Subdivision of Agricultural Land Act
SANBI	South African National Biodiversity Institute
SANRAL	South African National Roads Agency
SANS	South African National Standards
SARPs	Standards and Recommended Practices
SAWS	South African Weather Service
SDF	Spatial Development Frameworks

Abbreviation	Definition
SEF	Solar Energy Facilitates
SER	Stakeholder Engagement Report
SG	Surveyor General
SHERQ	Safety Health Environment Risk & Quality
SPLUMA	Spatial Planning and Land Use Management Act (Act 16 of 2013)
SWMP	Stormwater Management Plan
TOPs	Threatened or Protected Species
TR	Trunk roads
UNDP	United Nations' Development Programmes
WBG	World Bank Group
WCIF	Western Cape Infrastructure Framework
WEF	Wind Energy Facilities
WMP	Waste Management Plan
WSP	WSP Group Africa (Pty) Ltd
WUA	Water Use Authorisation
WUL	Water Use License

### 1 INTRODUCTION

Dalmanutha Wind (Pty) Ltd is proposing the development of a renewable energy facility, to be located approximately 7km south east of Belfast in the Mpumalanga Province of South Africa. Two alternatives are proposed for the renewable energy facility: Alternative 1 - a full wind energy facility, with a capacity of up to 300MW, comprising up to 70 wind turbines; and Alternative 2 - a hybrid facility, with a capacity of up to 300MW, comprising 44 turbines and two solar fields.

In order for the proposed project to proceed, it will require an Environmental Authorisation (EA) from the Competent Authority (CA) (i.e., the National Department of Forestry, Fisheries and Environment, (DFFE). WSP Group Africa (Pty) Ltd (WSP) has been appointed by Dalmanutha Wind (Pty) Ltd as the independent Environmental Assessment Practitioner (EA) to undertake an Environmental Impact Assessment (EIA) to meet the requirements under the National Environmental Management Act (Act 107 of 1998) (NEMA), for the proposed renewable energy facility.

According to the EIA report for the Dalmanutha renewable energy facility dated May 2023 to which this Environmental Management Programme (EMPr) is appended, it is the opinion of the EAP that the project can proceed with the implementation of Alternative 2, which is the preferred option based on the specialist findings, and as such, the focus of this EMPr is the proposed Dalmanutha Hybrid Energy Facility (up to 300MW) (Alternative 2).

### 1.1 BACKGROUND INFORMATION

The proposed Dalmanutha Hybrid Energy Facility will have a project area of approximately 9197 hectares (ha). Within this project area the extent of the buildable area will be approximately 400 ha subject to finalization based on technical and environmental requirements.

Site access is via the N4, which is approximately 220 meters from the proposed development area. The Dalmanutha Hybrid Energy Facility will be located over eighteen farm portions (**Figure 1-1** and **Figure 1-2**).



Figure 1-1 – Regional locality map of the Dalmanutha Hybrid Energy Facility



### Figure 1-2 – Layout map of Dalmanutha Hybrid Facility Development

### 1.2 DETAILS OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER

WSP was appointed in the role of Independent EAP to undertake the EIA process for the proposed project. The CV of the EAP is available in **Appendix A**. The EAP declaration of interest and undertaking is included in **Appendix B**. **Table 1-1** details the relevant contact details of the EAP.

EAP:	WSP Group Africa (Pty) Ltd
Contact Person:	Ashlea Strong
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Postal Address:	P.O. Box 98867, Sloane Park 2151, Johannesburg
Telephone:	011 361 1392
Fax:	011 361 1301
Email:	Ashlea.Strong@wsp.com
EAP Qualifications:	<ul> <li>Masters in Environmental Management, University of the Free State</li> <li>B Tech, Nature Conservation, Technikon SA</li> <li>National Diploma in Nature Conservation, Technikon SA</li> </ul>
EAPASA Registration Number:	EAPASA (2019/1005)

#### Table 1-1 – Details of the EAP

### 1.3 PURPOSE OF THE EMPR

An EMPr is defined as "an environmental management tool used to ensure that undue or reasonably avoidable adverse impacts of the construction, operation and decommissioning of a project are prevented or mitigated, and that the positive benefits of the project are enhanced."

This EMPr has been compiled in accordance with Appendix 4 of GNR 982, in compliance with section 24N of NEMA, with the purpose of ensuring that negative impacts are reduced, and positive effects are enhanced through a process of continual improvement, during the construction, operational and decommissioning phases of Dalmanutha Hybrid Energy Facility.

To facilitate compliance to the EMPr by appointed contractors and sub-contractors, it is required that all onsite personnel are aware of the requirements of the EMPr as well as the prescribed penalties, should a non-conformance be identified during the construction, operation and decommissioning activities.

Further to the above, appointed contractors and sub-contractors will also be required to comply with all relevant legislation and standards.

## A hard copy of the EMPr must always be in the site office and made available to officials at request.

### 1.3.1 EMPR OBJECTIVES

The EMPr has the following objectives:

- Identify mitigation measures and environmental specifications which are required to be implemented for the planning, construction and rehabilitation, operation, and decommissioning phases of the project in order to manage and minimise the extent of potential environmental impacts associated with the facility;
- Ensure that all the phases of the proposed project do not result in undue or reasonably avoidable adverse environmental impacts, and ensure that any potential environmental benefits are enhanced;
- Identify entities responsible for the implementation of the measures and outline functions and responsibilities;
- Create management structures that address the concerns and complaints of interested and affected parties (I&APs) with regards to the proposed project;
- Propose mechanisms and frequency for monitoring compliance, and preventing long-term or permanent environmental degradation; Comply with all applicable laws, regulations, standards and guidelines for the protection of the environment;
- Train onsite personnel with regard to their environmental obligations; and
- Facilitate appropriate and proactive responses to unforeseen events or changes in project implementation that was not considered in the EMPr process.

### 1.3.2 ENVIRONMENTAL OBJECTIVES AND TARGETS

To facilitate compliance to the EMPr, the Dalmanutha Hybrid Energy Facility must comply with all relevant legislation and standards and make all personnel aware of the requirements of the EMPr, as well as the prescribed penalties, should a non-conformance be identified during the different phases of the proposed project.

It is recommended that environmental objectives (as outlined in this document) be emphasised as minimum requirements. Objectives include:

- Encourage good management practices through planning and commitment to environmental issues; and
- Provide rational and practical environmental guidelines to:
- Minimise disturbance of the natural environment;
- Minimise fugitive emissions;
- Minimise impact of added traffic into the area;
- Ensure surface and groundwater resource protection;
- Prevent or minimise all forms of pollution;
- Protect indigenous flora and fauna;
- Prevent soil erosion;
- Promote sustainable use of resources;
- Adopt the best practical means available to prevent or minimise adverse environmental impacts;
- Comply with all applicable laws, regulations, standards and guidelines for the protection of the environment;
- Promote the reduction, reuse, recycling and recovery of waste;
- Develop waste management practices based on prevention, minimisation, recycling, treatment or disposal of waste;
- Describe all monitoring procedures required to identify impacts on the environment;
- Define how the management of the environment is reported and performance evaluated; and
- Train onsite personnel with regard to their environmental obligations.

### 1.4 STRUCTURE OF THE EMPR

For the purposes of demonstrating legal compliance, **Table 1-2** cross-references the sections within the EMPr with the requirements as per Appendix 4 of GNR 326 of 2017.

 Table 1-2 – Legislation Requirements as detailed in Appendix 4 of GNR 326

Appendix 4	Legislated Requirements as detailed in Appendix 4 of GNR 326	Relevant Report Section	
(a)	details of-		
	(i) the EAP who prepared the EMPr; and	Section 1.2	
	(ii) the expertise of that EAP to prepare an EMPr, including a curriculum vitae;	Section 1.2 Appendix A	
(b)	a detailed description of the aspects of the activity that are covered by the EMPr as identified by the project description;	Section 2.2	
(c)	a map at an appropriate scale which superimposes the proposed activity, its associated structures, and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that any areas that should be avoided, including buffers;	Section 3 Appendix C	
(d)	A description of the impact management outcomes, including management statements, identifying the impacts and risks that need to be avoided, managed and mitigated as identified through the environmental impact assessment process for all phases of the development including-	Section 3.2 and Section 6	
	(i) planning and design;		
	(ii) pre-construction activities;		
	(iii) construction activities;		
	(iv) rehabilitation of the environment after construction and where applicable post closure; and		
	(v) where relevant, operation activities;		
(f)	a description of proposed impact management actions, identifying the manner in which the impact management outcomes contemplated in paragraphs (d) will be achieved, and must, where applicable, include actions to -	Section 6	
	(i) avoid, modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation;		
	(ii) comply with any prescribed environmental management standards or practices;		
	(iii) comply with any applicable provisions of the Act regarding closure, where applicable; and		

Appendix 4	Legislated Requirements as detailed in Appendix 4 of GNR 326	Relevant Report Section
	(iv) comply with any provisions of the Act regarding financial provisions for rehabilitation, where applicable	
(g)	the method of monitoring the implementation of the impact management actions contemplated in paragraph (f);	Section 5
(h)	the frequency of monitoring the implementation of the impact management actions contemplated in paragraph (f);	Section 5
(i)	an indication of the persons who will be responsible for the implementation of the impact management actions;	Section 5 / Section 6
(j)	the time periods within which the impact management actions contemplated in paragraph (f) must be implemented;	Section 6
(k)	the mechanism for monitoring compliance with the impact management actions contemplated in paragraph (f);	Section 5
(I)	a program for reporting on compliance, taking into account the requirements as prescribed by the Regulations	Section 5 / Section 6
(m)	an environmental awareness plan describing the manner in which-	Section 5.2
	(i) the applicant intends to inform his or her employees of any environmental risk which may result from their work; and	
	(ii) risks must be dealt with in order to avoid pollution or the degradation of the environment; and	
(n)	any specific information that may be required by the competent authority	N/A

### 2 PROJECT DESCRIPTION

This section provides a description of the location of the project site and a summary of the project details. The descriptions encompass the activities to be done during the construction, operational and decommissioning (should it be decided that the facility will be decommissioned) phases, as well as the consideration for the need and desirability of the project in accordance with Appendix 3 of GNR 326.

### 2.1 LOCATION OF THE PROPOSED PROJECT

The proposed Dalmanutha Hybrid Energy Facility will have a project area of approximately 9 197 hectares (ha). Within this project area the extent of the buildable area will be approximately 400 ha subject to finalization based on technical and environmental requirements.

The proposed Dalmanutha Hybrid Energy Facility is located approximately 7km south-east of Belfast in Mpumalanga and falls within jurisdiction of the Emakhazeni and Albert Luthuli Local Municipalities within theNkangala and Gert Sibande District municipalities. The Dalmanutha Hybrid Energy Facility and the Dalmanutha West Wind Energy Facility (WEF) are located adjacent each other and as such, the overall locality of the Dalmanutha Complex is included in **Figure 1-1**. The Dalmanutha Hybrid Energy Facility project site, including associated infrastructure, is indicated in **Figure 2-1**. The details of the properties associated with the proposed Dalmanutha Hybrid Energy Facility, including the 21-digit Surveyor General (SG) codes for the cadastral land parcels are outlined in **Table 2-1** 

The co-ordinates for the application site, solar fields, turbine positions and onsite substation (including BESS) are illustrated in **Figure 2-2** and **Figure 2-3** and outlined in **Table 2-2**.



Figure 2-1 – Dalmanutha Hybrid Energy Facility (up to 300MW)

### Table 2-1 - Dalmanutha Hybrid Energy Facility Affected Farm Portions

Farm portion and name	21 Digit Surveyor General Code of Each Cadastral Land Parcel		
Portion 1 of Farm Berg-en-Dal 378 JT	T0JT0000000037800001		
Portion 9 of Farm Berg-en-Dal 378 JT	T0JT0000000037800009		
Portion 7 of Farm Vogelstruispoort 384 JT	T0JT0000000038400007		
Portion 6 of Farm Waaikraal 385 JT	T0JT0000000038500006		
Portion 7 of Farm Waaikraal 385 JT	T0JT0000000038500007		
Portion 8 of Farm Waaikraal 385 JT	T0JT0000000038500008		
Portion 10 of Farm Waaikraal 385 JT	T0JT0000000038500010		
Portion 12 of Farm Waaikraal 385 JT	T0JT0000000038500012		
Portion 13 of Farm Waaikraal 385 JT	T0JT0000000038500013		
Poriton 5 of Farm Vogelstruispoort 384 JT	T0JT0000000038400005		
Portion 24 of Farm Waaikraal 385 JT	T0JT0000000038500024		
Portion 3 of Farm Leeuwkloof 403 JT	T0JT0000000040300003		
Portion 4 of Farm Leeuwkloof 403 JT	T0JT0000000040300004		
Portion 1 of Farm Leeuwkloof 404 JT	T0JT0000000040400001		
Portion 2 of Farm Leeuwkloof 404 JT	T0JT0000000040400002		
Portion 3 of Farm Geluk 405 JT	T0JT0000000040500003		
Portion 1 of Farm Welgevonden 412	T0JT0000000041200001		
Portion 0 of Farm Camelia 467 JT	T0JT0000000046700000		



## Figure 2-2 – Dalmanutha Hybrid Energy Facility footprint corner point coordinates



Figure 2-3 – Dalmanutha Solar Facility footprint corner point coordinates

Label	Longitude	Latitude		
Solar Fields				
A	30° 7' 31.581" E	25° 51' 16.640" S		
В	30° 7' 30.177" E	25° 51' 30.806" S		
С	30° 7' 2.246" E	25° 51' 22.522" S		
D	30° 6' 57.709" E	25° 51' 28.438" S		
Е	30° 6' 57.519" E	25° 51' 41.841" S		
F	30° 6' 59.149" E	25° 51' 41.402" S		
G	30° 7' 7.850" E	25° 51' 32.811" S		
н	30° 5' 23.480" E	25° 52' 57.299" S		
1	30° 5' 31.173" E	25° 52' 57.199" S		
J	30° 5' 38.189" E	25° 52' 42.919" S		
К	30° 5' 45.406" E	25° 52' 40.023" S		
L	30° 5' 50.567" E	25° 52' 30.061" S		
М	30° 5' 51.705" E	25° 52' 22.205" S		
Ν	30° 5' 53.498" E	25° 52' 18.571" S		
0	30° 5' 54.773" E	25° 52' 13.217" S		
Ρ	30° 6' 0.156" E	25° 52' 7.501" S		
Q	30° 5' 56.173" E	25° 51' 54.368" S		
R	30° 5' 17.940" E	25° 52' 3.978" S		
S	30° 5' 31.279" E	25° 52' 38.210" S		
Т	30° 5' 27.044" E	25° 52' 40.581" S		

### Table 2-2 - Co-ordinates of the Dalmanutha Hybrid Energy Facility Site Extent

Label	Longitude	Latitude		
U	30° 5' 22.950" E	25° 52' 44.806" S		
Application site Coordinates				
1	25°43'54.12"S	30° 5'55.66"E		
2	25°43'57.22"S	30° 6'20.95"E		
3	25°43'57.81"S	30° 6'20.86"E		
4	25°43'59.86"S	30° 6'37.95"E		
5	25°43'59.30"S	30° 6'38.10"E		
6	25°44'2.41"S	30° 7'3.05"E		
7	25°45'21.42"S	30° 7'29.79"E		
8	25°45'22.62"S	30° 7'25.45"E		
9	25°45'43.80"S	30° 7'32.58"E		
10	25°45'48.28"S	30° 8'10.72"E		
11	25°45'11.42"S	30° 8'9.34"E		
12	25°45'4.36"S	30° 8'37.63"E		
13	25°45'5.91"S	30° 9'47.70"E		
14	25°46'20.77"S	30° 9'35.58"E		
15	25°47'25.26"S	30° 8'38.98"E		
16	25°48'10.27"S	30° 7'25.58"E		
17	25°48'45.95"S	30° 7'13.05"E		
18	25°49'2.15"S	30° 7'17.02"E		
19	25°49'0.79"S	30° 7'44.58"E		

Label	Longitude	Latitude
20	25°49'0.15"S	30° 8'13.15"E
21	25°49'58.08"S	30° 8'18.01"E
22	25°49'47.55"S	30° 8'59.06"E
23	25°51'19.72"S	30° 8'40.86"E
24	25°51'21.20"S	30° 8'26.42"E
25	25°52'41.96"S	30° 8'47.84"E
26	25°53'20.35"S	30° 7'4.42"E
27	25°53'14.51"S	30° 6'52.29"E
28	25°53'23.79"S	30° 6'45.87"E
29	25°53'59.19"S	30° 5'40.38"E
30	25°53'43.58"S	30° 5'37.07"E
31	25°52'9.95"S	30° 5'0.86"E
32	25°50'27.19"S	30° 5'36.02"E
33	25°50'34.72"S	30° 5'8.47"E
34	25°50'29.04"S	30° 4'51.84"E
35	25°50'10.84"S	30° 4'25.99"E
36	25°49'38.37"S	30° 4'28.47"E
37	25°49'18.75"S	30° 4'34.79"E
38	25°49'11.85"S	30° 5'5.10"E
39	25°47'50.37"S	30° 5'6.15"E

Label	Longitude	Latitude	
40	25°47'5.08"S	30° 4'58.22"E	
41	25°46'40.61"S	30° 5'58.12"E	
42	25°45'45.56"S	30° 5'54.67"E	
43	25°45'50.72"S	30° 5'30.95"E	
44	25°44'28.78"S	30° 5'25.22"E	
On-site IPP SS & BESS 4ha centre	coordinates		
	25°48'37.63"S	30° 6'37.08"E	
Laydown area and construction camp centre coordinates			
Laydown area and construction ca	amp centre coordinates		
Laydown area and construction ca Laydown area 1	amp centre coordinates 25°46'37.49"S	30° 6'4.25"E	
Laydown area and construction ca Laydown area 1 Laydown area 2	25°46'37.49"S 25°50'34.80"S	30° 6'4.25"E 30° 6'26.86"E	
Laydown area and construction carLaydown area 1Laydown area 2Construction camp 1	amp centre coordinates 25°46'37.49"S 25°50'34.80"S 25°46'34.24"S	30° 6'4.25"E 30° 6'26.86"E 30° 6'5.96"E	
Laydown area and construction carLaydown area 1Laydown area 2Construction camp 1Construction camp 2	amp centre coordinates         25°46'37.49"S         25°50'34.80"S         25°46'34.24"S         25°50'30.40"S	30° 6'4.25"E 30° 6'26.86"E 30° 6'5.96"E 30° 6'27.97"E	
Laydown area and construction caLaydown area 1Laydown area 2Construction camp 1Construction camp 2Batching plant & Wind tower factor	amp centre coordinates         25°46'37.49"S         25°50'34.80"S         25°46'34.24"S         25°50'30.40"S	30° 6'4.25"E 30° 6'26.86"E 30° 6'5.96"E 30° 6'27.97"E	
Laydown area and construction carLaydown area 1Laydown area 2Construction camp 1Construction camp 2Batching plant & Wind tower factory 1	amp centre coordinates         25°46'37.49"S         25°50'34.80"S         25°46'34.24"S         25°50'30.40"S         ory centre coordinates         25°46'46.22"S	30° 6'4.25"E 30° 6'26.86"E 30° 6'5.96"E 30° 6'27.97"E 30° 6'4.94"E	

### 2.2 ACTIVITY DESCRIPTION

The following are proposed as part of the project. The total project area is 9 197ha. The project footprint (~400ha) will contain the following:

### 2.2.1 WIND TURBINES

- Up to 44 turbines, each with a foundation of approximately 25m<sup>2</sup> in diameter (500m<sup>2</sup> area and requiring ~2 500m<sup>3</sup> concrete each) and approximately 3m depth;
- Turbine hub height of up to 200m;

- Rotor diameter up to 200m; and
- Permanent hard standing area for each wind turbine (approximately 1ha).

### 2.2.2 SOLAR FIELDS

The total development footprint for the PV installation is approximately 160ha. Solar PV modules which convert solar radiation directly into electricity, will have a maximum height of 6m (when the panel is horizontal). The solar PV modules will be elevated above the ground and will be located on either single or dual axis tracking structures or fixed tilt mounting structures or similar. Inverters, transformers and other required associated electrical infrastructure and components will form part of the facility.

### 2.2.3 IPP ONSITE SUBSTATION AND BESS

IPP portion onsite substation of up to 4ha. The substation will consist of a high voltage substation yard to allow for multiple up to 132kV feeder bays and transformers, control building, telecommunication infrastructure, access road, etc.

The Battery Energy Storage System (BESS) storage capacity will be up to 300MW/1200 megawatthour (MWh) with up to four hours of storage. It is proposed that Lithium Battery Technologies, such as Lithium Iron Phosphate, Lithium Nickel Manganese Cobalt oxides or Vanadium Redox flow technologies will be considered as the preferred battery technology; however, the specific technology will only be determined following Engineering, Procurement, and Construction (EPC) procurement. The main components of the BESS include the batteries, power conversion system and transformer which will all be stored in various rows of containers.

### 2.2.4 OPERATION AND MAINTENANCE BUILDING INFRASTRUCTURE

- Operations and maintenance (O&M) building infrastructure will be required to support the functioning of the WEF and for services required by operations and maintenance staff. The O&M building infrastructure will be located in close proximity to the onsite substation and will include:
  - Operations building of approximately  $20m \times 10m = 200m^2$ ;
  - Workshop area of approximately 15m x 10m= 150m<sup>2</sup>;
  - Stores area of approximately 15m x 10m = 150m<sup>2</sup>; and
  - Refuse area for temporary waste storage and septic/conservancy tanks with portable toilets to service ablution facilities.
- The total combined area of the buildings will not exceed 5 000m<sup>2</sup>.

### 2.2.5 CONSTRUCTION CAMP LAYDOWN

- Temporary laydown or staging area-Typical area 220m x 100m = 22000m<sup>2</sup>.
- Laydown area could increase to 30000m<sup>2</sup> for concrete towers, should they be required.
- Sewage: septic and/or conservancy tanks and portable toilets.
- Temporary cement batching plant, wind tower factory & yard of approximately 7ha, comprising amongst others, a concrete storage area, batching plant, electrical infrastructure and substation, generators and fuel stores, gantries and loading facilities, offices, material stores (rebar, concrete, aggregate and associated materials), mess rooms, workshops, laydown and storage areas, sewage and toilet facilities, offices and boardrooms, labour mess and changerooms,

mixers, moulds and casting areas, water and settling tanks, pumps, silos and hoppers, a laboratory, parking areas, internal and access roads - Gravel and sand will be stored in separate heaps whilst the cement will be contained in a silo.

• The maximum height of the silo will be 20m.

### 2.2.6 INTERNAL ROAD

Internal and access roads with a width of between 8m and 10m, which can be increased to approximately 12m on bends. The roads will be positioned within a 20m wide corridor to accommodate cable trenches, stormwater channels and bypass /circles of up to 20m during construction. Length of the internal roads will be approximately 60km. For the solar energy facility, internal gravel roads will be established between the arrays and will be up to 4m wide.

### 2.2.7 ASSOCIATED INFRASTRUCTURE

- The medium voltage collector system will comprise of cables up to and including 33kV that run underground, except where a technical assessment suggest that overhead lines are required, within the facility connecting the turbines to the onsite substation. The solar energy facility (SEF) will comprise low and medium voltage cabling between components (above or below ground as needed).
- Over the fence 132kV cable to connect the on-site substation to the Common Collector Switching Station.
- Fencing of up to 4m high around the construction camp and lighting.
- Lightning protection.
- Telecommunication infrastructure.
- Stormwater channels.
- Water pipelines.
- Offices.
- Operational control centre.
- Operation and Maintenance Area/Warehouse/workshop.
- Ablution facilities.
- A gatehouse.
- Control centre, offices, warehouses.
- Security building.
- A visitor's centre.
- Substation building.

### 2.3 PROPOSED PROJECT DEVELOPMENT ACTIVITIES

### 2.3.1 CONSTRUCTION PHASE

The construction process will follow industry standard methods and techniques. Key activities associated with the construction phase are described in **Table 2-3**.

### Table 2-3 – Construction activities

Activity	Description
Establishment of access and internal roads	The Project site can be accessed easily via either the tarred R33 or the N4 national road which run along the northern and western boundaries of the site.
	There is an existing road that goes through the land parcels to allow for direct access to the project development area.
	Internal and access roads with a width of between 8m and 10m, which can be increased to approximately 12m on bends. The roads will be positioned within a 20m wide corridor to accommodate cable trenches, stormwater channels and bypass /circles of up to 20m during construction. Length of the internal roads will be approximately 60km. For the solar energy facility, internal gravel roads will be established between the arrays and will be up to 4m wide.
Site preparation and establishment	Site establishment will include clearing of vegetation and topsoil at the footprint of each turbine, for laydown area and access routes. The temporary laydown area will be constructed, including establishment of the construction camp (temporary offices, storage containers, concrete batching plant etc). Site establishment will also entail the installation and/or connection of services (sanitation, electricity etc).
Transport of components and equipment to site	All construction material, machinery and equipment (i.e. graders, excavators, trucks, cement mixers etc.) will be transported to site utilising the national, regional and local road network.
	Bulk materials (aggregate, steel etc.), infrastructure components (blades, tower sections etc), lifting and construction equipment (excavators, trucks, compaction equipment etc.) will be sourced and transported to site via suitable National and provincial routes and designated access roads.
	The infrastructure components may be defined as abnormal loads in terms of the Road Traffic Act (Act 29 of 1989) due to their large size and abnormal lengths and loads for transportation. A permit may be required for the transportation of these loads on public roads.
Excavation and earthworks	Subject to the determination of founding specifications, earthworks will be required. This is likely to entail:
	Excavation of foundation holes to a depth of approximately 3m and pouring of concrete foundations of approximately 2 500m <sup>3</sup> from the batching plant. Concrete foundations will be constructed at each turbine location.
	Levelling of the construction camp area, substation area, and O&M building area, and excavation of foundations prior to construction.
	Excavation of trenches for the installation of underground cables.
Establishment of a Construction camp and laydown area on site	The laydown areas will also be utilised for the assembly of the PV panels. The laydown area will limit potential environmental impacts associated with the construction phase by limiting the extent of the activities to one designated area.
	<ul> <li>Temporary laydown or staging area -Typical area 220m x 100m = 22000m<sup>2</sup>.</li> <li>Laydown area could increase to 30000m<sup>2</sup> for concrete towers, should they be required.</li> <li>Sewage: septic and/or conservancy tanks and portable toilets.</li> <li>Temporary cement batching plant, wind tower factory &amp; yard of approximately 7ha, comprising amongst others, a concrete storage area, batching plant, electrical infrastructure and substation, generators and fuel stores, gantries and loading facilities, offices, material stores (rebar, concrete, aggregate and</li> </ul>

Activity	Description
	associated materials), mess rooms, workshops, laydown and storage areas, sewage and toilet facilities, offices and boardrooms, labour mess and changerooms, mixers, moulds and casting areas, water and settling tanks, pumps, silos and hoppers, a laboratory, parking areas, internal and access roads - Gravel and sand will be stored in separate heaps whilst the cement will be contained in a silo. The maximum height of the silo will be 20m.
Erection of wind turbine towers	A large lifting crane(s) will be required to lift the turbine sections (nacelle, blades) into place. The lifting crane/s will be brought on site and will be required to move between the turbine site. Cranes of varying sizes may be required depending on the size of the components.
	Operations and maintenance (O&M) building infrastructure will be required to support the functioning of the WEF and for services required by operations and maintenance staff. The O&M building infrastructure will be near the onsite substation and will include:
	<ul> <li>Operations building of approximately 200m<sup>2</sup>;</li> <li>Workshop and stores area of approximately 150m<sup>2</sup> each;</li> <li>Stores area of approximately 150m<sup>2</sup>;</li> <li>Refuse area for temporary waste storage and septic/conservancy tanks with portable toilets to service ablution facilities.</li> </ul>
Erection of PV Panels	The PV panels will be arranged in arrays. The frames will be fixed onto vertical posts that will be driven into the ground utilising the relevant foundation method identified during the geotechnical studies, including potentially employing concrete foundations for the panel frames. PV panels will have a maximum height of 6m (when the panel is horizontal).
Onsite substation and BESS	An IPP onsite substation will be constructed on the site. The wind turbines and solar PV array will be connected to the IPP onsite substation via underground or overhead (if required) up to 33kV electrical cables. The BESS will typically require the placement of multiple containers to house the BESS components, which will be brought to sight pre-assembled.
Construction of substation and inverters	The facility output voltage will be stepped up from medium voltage to high voltage in the transformer. The medium voltage cables will be run underground (where practical) within the facility to a common point before being fed to the onsite substation.
Establishment of ancillary infrastructure	Ancillary infrastructure will include a workshop, storage areas, office, and a temporary laydown area for contractor's equipment.
Rehabilitation	Once all construction is completed on site and all equipment and machinery has been removed from the site, the site will be rehabilitated.

### 2.3.2 OPERATIONAL PHASE

During operation, the key activities will include inspection and maintenance of the Wind turbines, solar panels, substations, BESS, and other associated infrastructure.

### 2.3.3 DECOMMISSIONING PHASE

The proposed facility is expected to be operational for approximately 25 years. Should it be decided not to extend beyond the 25 years lifespan, the facility will be decommissioned. The

decommissioning phase includes the activities associated with the removal/dismantling of the WEF, SEF and associated infrastructure when no longer necessary. This would entail returning the land to its pre-construction state. The decommissioning phase will include activities similar to that of the construction phase as indicated in **Table 2-3**.

### **3 ENVIRONMENTAL SENSITIVITY**

### 3.1 SITE SENSITIVITY VERIFICATION SUMMARY

A summary of the DFFE screening tool, the applicable legislation as well as the specialist sensitivity verification are detailed in Table 3-1 below.

Specialist Assessment	Assessment Protocol	DFFE Screening Tool Sensitivity (WEF)	DFFE Screening Tool Sensitivity (SEF)	Specialist Sensitivity Verification
Agricultural Compliance Statement	Protocol for the specialist assessment and minimum report content requirements of environmental impacts on agricultural resources by onshore wind and/or solar photovoltaic energy generation facilities where the electricity output is 20 megawatts or more	High and Medium Sensitivity	High and Medium Sensitivity	High and Low Sensitivity
Terrestrial Biodiversity Impact Assessment	Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Terrestrial Biodiversity	High Sensitivity	High Sensitivity	High Sensitivity
Aquatic Biodiversity Impact Assessment	Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Aquatic Biodiversity	High and Low Sensitivity	High and Low Sensitivity	High to Very High Sensitivity for Wetlands
Plant Species	Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Terrestrial Plant Species	Medium and Low Sensitivity	Medium and Low Sensitivity	Medium Sensitivity
Animal Species	Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Terrestrial Animal Species	High and Medium Sensitivity	High and Medium Sensitivity	High-Medium Sensitivity
Bats	Site Sensitivity Verification Requirements where a specialist Assessment is required but no Specific	High Sensitivity	N/A	High to Medium Sensitivity

Table 3-1 - Assessment Protocols and Site Sensitivity Verification Summary
Specialist Assessment	Assessment Protocol	DFFE Screening Tool Sensitivity (WEF)	DFFE Screening Tool Sensitivity (SEF)	Specialist Sensitivity Verification
	Assessment Protocol has been prescribed			
Avifauna Impact Assessment	Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Terrestrial Animal Species	Low Sensitivity	Low Sensitivity	Very High Sensitivity
Archaeological and Cultural Heritage Impact Assessment	Site Sensitivity Verification Requirements where a specialist Assessment is required but no Specific Assessment Protocol has been prescribed	Low Sensitivity	Low Sensitivity	Low with isolated points as High Sensitivity
Palaeontology Impact Assessment	Site Sensitivity Verification Requirements where a specialist Assessment is required but no Specific Assessment Protocol has been prescribed	Very High and High Sensitivity	Very High and High Sensitivity	Low Sensitivity
Visual (Landscape) Impact Assessment	Site Sensitivity Verification Requirements where a specialist Assessment is required but no Specific Assessment Protocol has been prescribed	Very High Sensitivity	Very High Sensitivity	High Sensitivity
Flicker Assessment	Site Sensitivity Verification Requirements where a specialist Assessment is required but no Specific Assessment Protocol has been prescribed	High and Low Sensitivity	N/A	High Sensitivity
Noise Assessment	Protocol for Specialist Assessment and Minimum Report Content requirements for Noise Impacts	High and Low Sensitivity	N/A	Medium to Low Sensitivity
Civil Aviation Assessment	Site Sensitivity Verification Requirements where a specialist Assessment is required but no Specific Assessment Protocol has been prescribed	High Sensitivity	Low Sensitivity	Low Sensitivity

Specialist Assessment	Assessment Protocol	DFFE Screening Tool Sensitivity (WEF)	DFFE Screening Tool Sensitivity (SEF)	Specialist Sensitivity Verification
Defence Assessment	Site Sensitivity Verification Requirements where a specialist Assessment is required but no Specific Assessment Protocol has been prescribed	Low Sensitivity	Low Sensitivity	Low Sensitivity
RFI Assessment	Site Sensitivity Verification Requirements where a specialist Assessment is required but no Specific Assessment Protocol has been prescribed	Low Sensitivity	Low Sensitivity	Low Sensitivity

### 3.2 SENSITIVITY MAPPING AND DEVELOPMENT ENVELOPE

The Dalmanutha site boundary was assessed by the specialists as part of assessments and subsequent fieldwork. The specialists provided their sensitivity layers indicating the various sensitivities present on site. Utilising the sensitivity layers (which includes the required buffers) provided by the specialists, a preliminary consolidated environmental sensitivity map showing the "No-Go" areas has been compiled for the preferred Alternative 2, as illustrated in **Figure 3-1**.



### Figure 3-1 – Combined Sensitivity Map and Proposed Development infrastructure for Dalmanutha Hybrid Energy Facility

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### 3.3 IMPACT ASSESSMENT OUTCOMES

A summary of the identified impacts and corresponding significance ratings for the proposed Dalmanutha Hybrid Energy Facility is provided in **Table 3**-**2** below.

The summary of the identified impacts concluded the following:

- Three specialist studies identified Alternative 1 as the preferred Alternative, namely Noise, terrestrial plant species and terrestrial animal species;
- Three specialist studies identified Alternative 2 as the preferred Alternative, namely Avifauna, Aquatic Biodiversity and Bats; and
- The remainder of the specialist studies showed no preference for either Alternative.

However, should the turbines near Rec 17 and Rec 18 be relocated slightly, the impact significance for Alternative 2 would be reduced to low, thereby resulting in no preference between Alternative 1 and 2.

The above turbine relocation as well as the implementation of the Biodiversity Offset Strategy would result in Alternative 2 being preferred.

Table 3-2 – Construction.	<b>Operation and Decommissionin</b>	a Impact Summarv
		J

No	Impact	Phase	Alternative	1			Alternative	2			Preferred Alternativ	/e
			Pre- Mitigat	tion	Post Mitiga	tion	Pre- Mitigat	tion	Post Mitiga	tion	Alt 1	Alt 2
Nois	e	-			•		•		•			1
	Construction phase impacts of noise on sensitive receptors	Construction	Low	(-)	Very low	(-)	Low	(-)	Very low	(-)	~	
	Operational phase impacts of noise on sensitive	Operation	Low	(-)	Low		Moderate	(-)	Low	(-)		



No	Impact	Phase	Alternative	1			Alternative	2			Preferred Alternativ	l /e
			Pre- Mitiga	tion	Post Mitiga	tion	Pre- Mitiga	tion	Post Mitiga	tion	Alt 1	Alt 2
	receptors											
Geo	ogy											
	Soil Erosion	Construction	High	(-)	Very low	(-)	High	(-)	Very low	(-)	$\checkmark$	1
	Oil Spillages	Construction	Very high	(-)	Low	(-)	Very high	(-)	Low	(-)		
	Soil Erosion	Operation	Low	(-)	N/A	(-)	Low	(-)	N/A	(-)		
	Oil Spillages	Operation	Moderate	(-)	Low	(-)	Moderate	(-)	Low	(-)		
	Soil Erosion	Decommissioning	Moderate	(-)	Very Low	(-)	Moderate	(-)	Very Low	(-)		
	Oil Spillages	Decommissioning	High	(-)	low	(-)	High	(-)	low	(-)		
Soils	5											·
	Loss of Soil	Construction	Moderate	(-)	Low	(-)	Moderate	(-)	Low	(-)	✓	✓
	Loss of Arable Land	Construction	High	(-)	Moderate	(-)	High	(-)	Moderate	(-)		
	Disturbance to Agricultural Practices	Construction	Moderate	(-)	Low	(-)	Moderate	(-)	Low	(-)	•	
	Erosion and Sedimentation	Construction	Moderate	(-)	Low	(-)	Moderate	(-)	Low	(-)		
	Soil Contamination	Construction	High	(-)	Low	(-)	High	(-)	Low	(-)		
	Loss of Soil	Operation	Moderate	(-)	Low	(-)	Moderate	(-)	Low	(-)		
	Loss of Arable Land	Operation	Moderate	(-)	Moderate	(-)	Moderate	(-)	Moderate	(-)		



No	Impact	Phase	Alternative	1			Alternative	2			Preferred Alternativ	i ve
			Pre- Mitiga	tion	Post Mitiga	ition	Pre- Mitiga	tion	Post Mitiga	ition	Alt 1	Alt 2
	Disturbance to Agricultural Practices	Operation	Moderate	(-)	Very low	(-)	Moderate	(-)	Very low	(-)		
	Erosion and Sedimentation	Operation	Moderate	(-)	Low	(-)	Moderate	(-)	Low	(-)		
	Soil Contamination	Operation	Moderate	(-)	Low	(-)	Moderate	(-)	Low	(-)		
Surf	ace water	·			-		-		-		·	
	Clearing of vegetation and stripping of top soil	Construction	Moderate	(-)	Low	(-)	Moderate	(-)	Low	(-)	✓	✓
	Earthworks	Construction	Moderate	(-)	Low	(-)	Moderate	(-)	Low	(-)	-	
	Materials management	Construction	Moderate	(-)	Very low	(-)		(-)	Very low	(-)	-	
	Construction of turbines, road network and substations	Construction	Moderate	(-)	Low	(-)	Moderate	(-)	Low	(-)		
	Movement of vehicles and machinery	Construction	Moderate	(-)	Low	(-)	Moderate	(-)	Low	(-)		
	Physical presence of turbines, road network and substations	Operation	High	(-)	low	(-)	High	(-)	low	(-)		

No	Impact	Phase	Alternative	1			Alternative	2			Preferred Alternativ	l /e
			Pre- Mitiga	tion	Post Mitiga	ition	Pre- Mitiga	tion	Post Mitiga	ition	Alt 1	Alt 2
	Materials management	Operation	Moderate	(-)	Very low	(-)	Moderate	(-)	Very low	(-)		
	Movement of vehicles and machinery for maintenance activities	Operation	Moderate	(-)	Very low	(-)	Moderate	(-)	Very low	(-)		
	Physical presence of former turbines, road network and substations	Decommissioning	High	(-)	low	(-)	High	(-)	low	(-)	-	
	Use of vehicles and heavy machinery to remove infrastructure	Decommissioning	Moderate	(-)	Low	(-)	Moderate	(-)	Low	(-)	-	
Terr	estrial animals	1	-				-		-			
	Loss and disturbance of fauna habitat	Construction	High	(-)	Moderate	(-)	High	(-)	Moderate	(-)	✓	
	Fragmentation of habitat and disruption of fauna movement/dispersal	Construction	Moderate	(-)	Low	(-)	Moderate	(-)	Low	(-)		
	Injury, mortality and disturbance of fauna	Construction	Moderate	(-)	Low	(-)	Moderate	(-)	Low			



No	Impact	Phase	Alternative	1			Alternative	2			Preferred Alternativ	l /e
			Pre- Mitiga	tion	Post Mitiga	tion	Pre- Mitiga	tion	Post Mitiga	tion	Alt 1	Alt 2
	Loss of fauna species of conservation concern	Construction	High	(-)	Moderate	(-)	High	(-)	Moderate	(-)		
	Establishment and spread of alien invasive species resulting in degradation of fauna habitat.	Construction	Moderate	(-)	Low	(-)	Moderate	(-)	Low	(-)		
	Injury and mortality of fauna, including SCC	Operation	Moderate	(-)	Low	(-)	Moderate	(-)	Low	(-)		
	Establishment and spread of alien invasive species resulting in degradation of fauna habitat.	Operation	Moderate	(-)	Low	(-)	Moderate	(-)	Low	(-)		
	Vibration from operating wind turbines		Moderate	(-)	Low	(-)	Moderate	(-)	Low	(-)	-	
	Establishment and spread of alien invasive species resulting in degradation of fauna habitat.	Decommissioning	Moderate	(-)	Low	(-)	Moderate	(-)	Low	(-)		
	Injury, Mortality and Disturbance of Fauna, including SCC	Decommissioning	Moderate	(-)	Low	(-)	Moderate	(-)	Low	(-)		
Terr	estrial plants											



No	Impact	Phase	Alternative	1			Alternative	2			Preferred Alternativ	l ve
			Pre- Mitiga	tion	Post Mitiga	ition	Pre- Mitiga	tion	Post Mitiga	ition	Alt 1	Alt 2
	Loss and disturbance of flora habitat	Construction	High	(-)	Moderate	(-)	High	(-)	Moderate	(-)	1	
	Disruption of ecosystem processes due to Project infrastructure	Construction	Moderate	(-)	Low	(-)	Moderate	(-)	Low	(-)		
	Establishment and spread of alien invasive species	Construction	Moderate	(-)	Low	(-)	Moderate	(-)	Low	(-)	-	
	Loss of flora of conservation concern	Construction	High	(-)	Moderate	(-)	High	(-)	Moderate	(-)	-	
	Increased incidences of soil erosion	Construction	Moderate	(-)	Low	(-)	Moderate	(-)	Low	(-)		
	Establishment and spread of alien invasive species	Operation	Moderate	(-)	Low	(-)	Moderate	(-)	Low	(-)	-	
	Establishment and spread of alien invasive species	Decommissioning	Moderate	(-)	Low	(-)	Moderate	(-)	Low	(-)	-	
	Increased incidences of soil erosion	Decommissioning	Moderate	(-)	Low	(-)	Moderate	(-)	Low	(-)		
Avif	auna											
	Habitat is destroyed and transformed	Construction	High	(-)	Moderate	(-)	High	(-)	Moderate	(-)		~



No	Impact	Phase	Alternative	1			Alternative	2			Preferred Alternativ	l /e
			Pre- Mitiga	tion	Post Mitiga	tion	Pre- Mitiga	tion	Post Mitiga	tion	Alt 1	Alt 2
	Birds are disturbed during construction activities	Construction	Low	(-)	Low	(-)	Low	(-)	Low	(-)		
	Birds are disturbed during operations of the facility	Operation	Low	(-)	Low	(-)	Low	(-)	Low	(-)		
	Birds are displaced entirely from the site	Operation	Low	(-)	Low	(-)	Low	(-)	Low	(-)		
	Birds are killed through collision with turbines	Operation	Very high	(-)	High	(-)	Very high	(-)	High	(-)		
	Birds are killed through flying into & colliding with power lines, or through perching on pylons & being electrocuted	Operation	High	(-)	Low	(-)	High	(-)	Low	(-)		
	Birds are killed through colliding with panels or entanglement in fences (Alternative 2 only)	Operation	N/A		N/A		Low	(-)	Low	(-)		
	Disturbance of birds	Decommissioning	Low	(-)	Low	(-)	Low	(-)	Low	(-)		
Aqu	atic Biodiversity											
	Loss of wetland habitat	Construction	Moderate	(-)	N/A	(-)	Moderate	(-)	N/A	N/A		✓



No	Impact	Phase	Alternative	1			Alternative	2			Preferred Alternativ	i ve
			Pre- Mitiga	tion	Post Mitiga	ition	Pre- Mitiga	tion	Post Mitiga	ition	Alt 1	Alt 2
	Interruption of wetland hydrology	Construction	Moderate	(-)	Low	(-)	Moderate	(-)	Low	(-)		
	Wetland water quality deterioration	Construction	Moderate	(-)	Very low	(-)	Moderate	(-)	Very low	(-)		
	Wetland soil erosion	Construction	Moderate	(-)	Low	(-)	Moderate	(-)	Low	(-)		
	Spread of AIS	Operation	Moderate	(-)	Very low	(-)	Moderate	(-)	Very low	(-)		
Bats	5											
	Habitat and Roost destruction	Construction	Low	(-)	Very low	(-)	Low	(-)	Very low	(-)		~
	Bat mortalities	Operational	High	(-)	Low	(-)	High	(-)	Low	(-)		
	Impacts on bats from artificial lights	Operational	Moderate	(-)	Low	(-)	Moderate	(-)	Low	(-)		
Visu	al											
	Potential visual impact of construction activities on sensitive visual receptors in close proximity to the proposed WEF.	Construction	High	(-)	Moderate	(-)	High	(-)	Moderate	(-)	✓	✓
	Potential visual impact on sensitive visual receptors located within a 5km radius of the wind turbine structures	Operational	Very high	(-)	Very high	(-)	Very high	(-)	Very high	(-)		



No	Impact	Phase	Alternative	1			Alternative 2				Preferred Alternative	
			Pre- Mitiga	tion	Post Mitiga	ition	Pre- Mitiga	tion	Post Mitiga	ition	Alt 1	Alt 2
	Potential visual impact on sensitive visual receptors within the local area (5 –10km radius)	Operational	High	(-)	High	(-)	High	(-)	High	(-)		
	Potential visual impact on sensitive visual receptors within the district (10 – 20km radius)	Operational	Moderate	(-)	Moderate	(-)	Moderate	(-)	Moderate	(-)		
	Potential visual impact on sensitive visual receptors within the region(beyond20 Km radius)	Operational	Low	(-)	Low	(-)	Low	(-)	Low	(-)		
	Potential visual impact on Protected Areas within the district	Operational	Moderate	(-)	Moderate	(-)	Moderate	(-)	Moderate	(-)	-	
	Shadow flicker	Operational	High	(-)	Moderate	(-)	High	(-)	Moderate	(-)		
	Potential visual impact of solar glint and glare as a visual distraction and possible air/road travel hazard	Operational	n/a		n/a		Low	(-)	Low	(-)		
	Potential visual impact of solar glint and glare on static ground-based	Operational	n/a		n/a		Low	(-)	Low	(-)		



No	Impact	Phase	Alternative	Alternative 1			Alternative 2				Preferred Alternative	
			Pre- Mitiga	tion	Post Mitiga	tion	Pre- Mitigat	tion	Post Mitiga	tion	Alt 1	Alt 2
	receptors (residents of homesteads) in close proximity to the PV facility											
	Potential visual impact of operational, safety and security lighting of the facility at night	Operational	High	(-)	Moderate	(-)	High	(-)	Moderate	(-)		
	Ancillary infrastructure	Operational	Low	(-)	Low	(-)	Low	(-)	Low	(-)		
	The potential impact on the sense of place of the region	Operational	Moderate	(-)	Moderate	(-)	Moderate	(-)	Moderate	(-)	·	
Pala	eontology	·									·	<u>.</u>
	Potential discovery of fossils on site	Constuction	Low	(-)	Very Low	(+)	Low	(-)	Very Low	(+)	~	1
Heri	tage											
	Graves located within the proposed development area close to roads and wind turbines	Construction	High	(-)	Low	(-)	High	(-)	Low	(-)	✓	×
	Historical infrastructure will be damaged / destroyed by the proposed development	Construction	Moderate	(-)	Very low	(-)	Moderate	(-)	Very low	(-)		



No	Impact	Phase	Alternative 1			Alternative 2				Preferred Alternativ	/e	
			Pre- Mitigat	tion	Post Mitiga	tion	Pre- Mitigat	tion	Post Mitiga	tion	Alt 1	Alt 2
	Iron Age sites will be damaged/ destroyed by the development	Construction	Moderate	(-)	Very low	(-)	Moderate	(-)	Very low	(-)		
	The project will alter the sense of place and impact on the cultural landscape.	Construction	Moderate	(-)	low	(-)	Moderate	(-)	low	(-)		
	Battlefield sites will be damaged/ destroyed.	Construction	n/a		n/a		Moderate	(-)	Very low	(-)		
	Graves located within the proposed development area close to roads and wind turbines	Operational	High	(-)	Low	(-)	High	(-)	Low	(-)		
	Historical infrastructure will be damaged / destroyed by the proposed development	Operational	Moderate	(-)	Very low	(-)	Moderate	(-)	Very low	(-)		
	Iron Age sites will be damaged/ destroyed by the development	Operational	Moderate	(-)	Very low	(-)	Moderate	(-)	Very low	(-)		
	The project will alter the sense of place and impact on the cultural landscape.	Operational	Moderate	(-)	low	(-)	Moderate	(-)	low	(-)		
	Battlefield sites will be damaged/ destroyed.	Operational	n/a		n/a		Moderate	(-)	Very low	(-)		



No	Impact	Phase	Alternative 1			Alternative 2				Preferred Alternative		
			Pre- Mitiga	tion	Post Mitiga	tion	Pre- Mitigat	tion	Post Mitiga	tion	Alt 1	Alt 2
	Graves located within the proposed development area close to roads and wind turbines	Decommissioning	High	(-)	Low	(-)	High	(-)	Low	(-)		
	Historical infrastructure will be damaged / destroyed by the proposed development	Decommissioning	Moderate	(-)	Very low	(-)	Moderate	(-)	Very low	(-)		
	Iron Age sites will be damaged/ destroyed by the development	Decommissioning	Moderate	(-)	Very low	(-)	Moderate	(-)	Very low	(-)		
	The project will alter the sense of place and impact on the cultural landscape.	Decommissioning	Moderate	(-)	low	(-)	Moderate	(-)	low	(-)		
	Battlefield sites will be damaged/ destroyed.	Decommissioning	n/a		n/a		Moderate	(-)	Very low	(-)		
Soci	al											I
	Increase in economic benefits	Construction	Very low	(+)	Moderate	(+)	Very low	(+)	Moderate	(+)	×	✓
	Preferential procurement	Construction	Low	(+)	Moderate	(+)	Low	(+)	Moderate	(+)		
	Noise	Construction	Low	(-)	Very low	(-)	Low	(-)	Very low	(-)		
	Visual	Construction	High	(-)	Low	(-)	High	(-)	Low	(-)		

No	Impact	Phase	Alternative 1			Alternative 2			Preferred Alternative			
			Pre- Mitiga	tion	Post Mitiga	ition	Pre- Mitiga	tion	Post Mitiga	ition	Alt 1	Alt 2
	Traffic	Construction	Moderate	(-)	Very low	(-)	Moderate	(-)	Very low	(-)		
	Population influx	Construction	Low	(-)	Very low	(-)	Low	(-)	Very low	(-)		
	Power generation	Operation	Low	(+)	Moderate	(+)	Low	(+)	Moderate	(+)		
	Employment	Operation	Very low	(+)	Moderate	(+)	Very low	(+)	Moderate	(+)		
	Economic development	Operation	Low	(+)	Moderate	(+)	Low	(+)	Moderate	(+)		
	Noise (alternative 1)	Operation	Low	(-)	Very low	(-)	Moderate	(-)	Moderate	(-)		
	Visual	Operation	High	(-)	Moderate	(-)	High	(-)	Moderate	(-)		
	Traffic	Operation	low	(-)	Very low	(-)	low	(-)	Very low	(-)		
	SHE Risk	Operation	Moderate	(-)	Low	(-)	Moderate	(-)	Low	(-)		
	Loss of employment	Decommissioning	Moderate	(-)	Low	(-)	Moderate	(-)	Low	(-)		
	Reduced regional economic development	Decommissioning	Moderate	(-)	Low	(-)	Moderate	(-)	Low	(-)	-	
	Associated infrastructure	Decommissioning	Moderate	(-)	Low	(-)	Moderate	(-)	Low	(-)		
Traf	lic					-				-	·	
	Noise, dust & exhaust pollution due to vehicle trips on-site	Construction	Low	(-)	Very low	(-)	Low	(-)	Very low	(-)	~	1
	Noise, dust & exhaust pollution due to	Construction	Moderate	(-)	Very low	(-)	Moderate	(-)	Very low	(-)	-	



No	Impact	Phase	Alternative 1			Alternative 2				Preferred Alternative		
			Pre- Mitigat	tion	Post Mitiga	tion	Pre- Mitiga	tion	Post Mitiga	tion	Alt 1	Alt 2
	additional trips on unsurfaced district road D1039, D2524, D2636, D560											
	Noise & exhaust pollution due to additional trips on the surfaced R33 and N4	Construction	Moderate	(-)	Very low	(-)	Moderate	(-)	Very low	(-)		
	Noise, dust & exhaust pollution due to vehicle trips on-site	Operation	Low	(-)	Very low	(-)	Low	(-)	Very low	(-)		
	Noise, dust & exhaust pollution due to additional trips on unsurfaced district road D1039, D2524, D2636, D560	Operation	Low	(-)	Very low	(-)	Low	(-)	Very low	(-)		
	Noise & exhaust pollution due to additional trips on the surfaced R33 and N4	Operation	Moderate	(-)	Very low	(-)	Moderate	(-)	Very low	(-)		
Tota	I										11	11

### 3.4 BIODIVERSITY OFFSET STRATEGY

Since direct loss of wetland and terrestrial habitats cannot be mitigated, these losses must be offset. The results of the application of wetland functional and ecosystem hectare equivalent calculations for wetland losses as a result of the proposed Project components using the revised SANBI and DWS offset guidelines (Macfarlane et al., 2014) and guidance provided in the draft Biodiversity Offset Guidelines (DFFE, 2022) are presented in the following sections.

#### WETLAND HABITAT

Details of wetland loss per affected hydrogeomorphic (HGM) unit, hectare equivalents and ecosystem conservation targets are provided in Appendix C of the Biodiversity Offset Report (**See Appendix J of EIAr**); summary figures for loss are provided in **Table 3-3**.

Between 1.45 and 1.95 ha of wetland habitat will be directly and permanently lost as a result of proposed road construction/improvements, depending on whether Alternative 1 or 2 is chosen, translating to a loss of between 0.85 and 1.32 hectare equivalents (ha-eq) of functional wetland habitat.

It is noted that these figures are likely to change once the final road layout has been determined. The required wetland offset will then be determined, and implemented via the Water Use License.

Project	Wetland type	Extent (ha)	Functional Hectare Equivalents	Ecosystem Conservation Target (habitat ha-eq)
Alt.1	Channelled valley bottom	0.73	0.43	5.14
	Unchannelled valley bottom	0.22	0.14	1.72
	Depression	0.15	0.13	1.6
	Hillslope seep	0.85	0.61	7.35
Subtotal		1.95	1.32	15.81
Alt.2	Channelled valley bottom	0.72	0.42	5.07
	Unchannelled valley bottom	0.42	0.23	2.81
	Floodplain	0.02	0.01	0.12
	Hillslope seep	0.29	0.18	2.22
Subtotal		1.45	0.85	10.22

 Table 3-3 – Predicted wetland losses to proposed project infrastructure

The loss of wetland habitat translates to an estimated ecosystem conservation target of between 10.22 and 15.81 habitat ha-eq, based on a calculated ecosystem conservation ratio of 12 (**Table 3-4**).

	Ecosyste m Status	Wetland Vegetation Group (or type based on local classification)	Mesic Highveld Grassland C and 6; Eastern Highveld Gra	Group 4, 5 assland
		Threat status of wetland	Threat status	EN
			Threat status Score	7.5
		Protection level of wetland	Protection level	Not Protected
			Protection level Score	2
		Ecosystem Status Multiplier		15
	Regional and National Conservati on context	Priority of wetland as defined in Regional and National Conservation Plans	High Importance	1
SO		Regional & National Context Multiplier		1.0
set ratio	Local site attributes	Uniqueness and importance of biota present in the wetland	High biodiversity value	1
ing off		Buffer zone integrity (within 500m of wetland)	Buffer compatibility score	0.5
ermin		Local connectivity	Good connectivity	0
Dete		Local Context Multiplier	0.8	
	Ecosystem	12.00		

#### Table 3-4 – Wetland ecosystem offset ratio determination (after Macfarlane et al., 2014)

#### **TERRESTRIAL HABITAT**

Residual impacts on terrestrial habitat were defined as the extent of natural habitats supporting plant/fauna SCC that would be lost as a result of the proposed development options.

The basic and adjusted offset ratios for natural terrestrial habitats are set out in **Table 3-5**, based on the biodiversity offset ratios look-up table provided in the draft Biodiversity Offset Guideline. When the relevant habitats fall within a CBA1, the ratio is automatically set to 30:1, while the basic ratio for areas within CBA2 is adjusted by increasing it by a factor of 1.5. For other mapped categories, excluding 'heavily modified' and 'modified' areas (i.e. Ecological Support Areas - ESAs and Other Natural Areas - ONA) the basic ratio applies.

#### Table 3-5 – Basic and adjusted biodiversity offset ratios for terrestrial habitats

Criteria	Basic Ratio (DFFE, 2022)	CBA1	CBA2
Endangered ecosystems	10:1	30:1	15:1

Eastern Highveld Grassland (EN)	13:1	30:1	19.5:1
KaNgwane Montane Grassland (EN)	10:1	30:1	15:1
Steenkampsberg Montane Grassland (LC)	0	30:1	0

Mapped vegetation communities within the study area that will be lost as a result of the proposed developments were ranked according to their occurrence in CBA1, CBA2, ESA and ONA areas mapped by the MBSP, see Appendix C of the Biodiversity offset report (**Appendix J of the ElAr)**Targets were then set for areas of natural habitat loss (i.e. loss of Disturbed Grassland, Dry Mixed Grassland, and Rocky Grassland) only. Loss of areas of Alien Tree Plantations, Cultivated Fields, Infrastructure and Transformed areas was not included in target setting, even if they occurred within areas mapped as CBA, since their loss is not considered a significant impact. In addition, loss of areas mapped as 'Moist Grassland and Wetland' in the terrestrial vegetation dataset were not included, since these areas are already accounted for in the wetland habitat targets.

The calculated targets for each vegetation group within the study area, for each Project component, are summarised on **Table 3-6.** While it is clear that in its current incarnation, Alternative 2 would result in an increased area of natural habitat loss compared to Alternative 1, and as such would be subjected to a higher offset target; it is noted that there is much greater scope to optimise the layout of project components (particularly solar arrays, and BESS infrastructure) to reduce the amount of natural habitat loss within CBA1 and CBA2, which is expected to reduce the preliminary figures presented here. The layout optimisation will be done as part of the final layout design post environmental authorisation.

MBSP category and Vegetation Communities	Estimated extent of loss based on current design (ha)	Offset Target
Dalmanutha WEF, Alternative 1	56.39	755.76
CBA Irreplaceable	23.89	716.80
Eastern Highveld Grassland	17.31	519.42
KaNgwane Montane Grassland	5.77	173.12
Steenkampsberg Montane Grassland	0.81	24.26
CBA Optimal	4.28	22.76
Eastern Highveld Grassland	0.39	7.65
KaNgwane Montane Grassland	1.01	15.11

#### Table 3-6 – Terrestrial habitat offset targets

# vsp

Steenkampsberg Montane Grassland	2.88	0.00
ESA Landscape corridor	11.69	0.19
Eastern Highveld Grassland	0.01	0.19
Steenkampsberg Montane Grassland	11.68	0.00
ESA Local corridor	7.70	14.74
Eastern Highveld Grassland	0.00	0.06
KaNgwane Montane Grassland	1.47	14.69
Steenkampsberg Montane Grassland	6.23	0.00
ESA Protected Area buffer	0.10	0.99
KaNgwane Montane Grassland	0.10	0.99
Other Natural Areas	8.73	0.29
Eastern Highveld Grassland	0.02	0.23
KaNgwane Montane Grassland	0.01	0.05
Steenkampsberg Montane Grassland	8.71	0.00
Dalmanutha WEF, Alternative 2	128.86	2088.51
CBA Irreplaceable	67.39	2021.74
CBA Irreplaceable Eastern Highveld Grassland	67.39 61.13	2021.74 1833.76
CBA Irreplaceable Eastern Highveld Grassland KaNgwane Montane Grassland	67.39 61.13 5.93	2021.74 1833.76 177.80
CBA Irreplaceable Eastern Highveld Grassland KaNgwane Montane Grassland Steenkampsberg Montane Grassland	67.39 61.13 5.93 0.34	2021.74 1833.76 177.80 10.18
CBA Irreplaceable Eastern Highveld Grassland KaNgwane Montane Grassland Steenkampsberg Montane Grassland CBA Optimal	67.39 61.13 5.93 0.34 6.23	2021.74 1833.76 177.80 10.18 29.69
CBA Irreplaceable Eastern Highveld Grassland KaNgwane Montane Grassland Steenkampsberg Montane Grassland CBA Optimal Eastern Highveld Grassland	67.39 61.13 5.93 0.34 6.23 0.32	2021.74 1833.76 177.80 10.18 29.69 6.26
CBA IrreplaceableEastern Highveld GrasslandKaNgwane Montane GrasslandSteenkampsberg Montane GrasslandCBA OptimalEastern Highveld GrasslandKaNgwane Montane Grassland	67.39 61.13 5.93 0.34 6.23 0.32 1.56	2021.74 1833.76 177.80 10.18 29.69 6.26 23.43
CBA IrreplaceableEastern Highveld GrasslandKaNgwane Montane GrasslandSteenkampsberg Montane GrasslandCBA OptimalEastern Highveld GrasslandKaNgwane Montane GrasslandSteenkampsberg Montane GrasslandSteenkampsberg Montane Grassland	67.39 61.13 5.93 0.34 6.23 0.32 1.56 4.35	2021.74 1833.76 177.80 10.18 29.69 6.26 23.43 0.00
CBA IrreplaceableEastern Highveld GrasslandKaNgwane Montane GrasslandSteenkampsberg Montane GrasslandCBA OptimalEastern Highveld GrasslandKaNgwane Montane GrasslandSteenkampsberg Montane GrasslandEastern Highveld GrasslandEastern Highveld GrasslandEastern Augura Montane GrasslandSteenkampsberg Montane GrasslandSteenkampsberg Montane GrasslandESA Landscape corridor	67.39 61.13 5.93 0.34 6.23 0.32 1.56 4.35 39.89	2021.74 1833.76 177.80 10.18 29.69 6.26 23.43 0.00 11.64
CBA IrreplaceableEastern Highveld GrasslandKaNgwane Montane GrasslandSteenkampsberg Montane GrasslandCBA OptimalEastern Highveld GrasslandKaNgwane Montane GrasslandSteenkampsberg Montane GrasslandKaNgwane Montane GrasslandSteenkampsberg Montane GrasslandKaNgwane Montane GrasslandKaNgwane Montane GrasslandESA Landscape corridorKaNgwane Montane Grassland	67.39 61.13 5.93 0.34 6.23 0.32 1.56 4.35 39.89 1.16	2021.74 1833.76 177.80 10.18 29.69 6.26 23.43 0.00 11.64 11.64
CBA IrreplaceableEastern Highveld GrasslandKaNgwane Montane GrasslandSteenkampsberg Montane GrasslandCBA OptimalEastern Highveld GrasslandKaNgwane Montane GrasslandSteenkampsberg Montane GrasslandSteenkampsberg Montane GrasslandSteenkampsberg Montane GrasslandSteenkampsberg Montane GrasslandESA Landscape corridorKaNgwane Montane GrasslandSteenkampsberg Montane GrasslandSteenkampsberg Montane GrasslandSteenkampsberg Montane Grassland	67.39 61.13 5.93 0.34 6.23 0.32 1.56 4.35 39.89 1.16 38.73	2021.74 1833.76 177.80 10.18 29.69 6.26 23.43 0.00 11.64 11.64 0.00
CBA IrreplaceableEastern Highveld GrasslandKaNgwane Montane GrasslandSteenkampsberg Montane GrasslandCBA OptimalEastern Highveld GrasslandKaNgwane Montane GrasslandSteenkampsberg Montane GrasslandSteenkampsberg Montane GrasslandSteenkampsberg Montane GrasslandESA Landscape corridorKaNgwane Montane GrasslandSteenkampsberg Montane GrasslandESA Landscape corridorKaNgwane Montane GrasslandSteenkampsberg Montane GrasslandSteenkampsberg Montane GrasslandSteenkampsberg Montane GrasslandSteenkampsberg Montane Grassland	67.39 61.13 5.93 0.34 6.23 0.32 1.56 4.35 39.89 1.16 38.73 7.38	2021.74 1833.76 177.80 10.18 29.69 6.26 23.43 0.00 11.64 11.64 0.00 21.95

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Steenkampsberg Montane Grassland	5.19	0.00
ESA Protected Area buffer	0.16	1.56
KaNgwane Montane Grassland	0.16	1.56
Other Natural Areas	7.80	1.93
Eastern Highveld Grassland	0.08	0.99
KaNgwane Montane Grassland	0.09	0.94
Steenkampsberg Montane Grassland	7.63	0.00

#### **BIRD SPECIES**

The significance of the turbine collision risk of Alternative 1 for multiple Red Listed (including Critically Endangered & Endangered) species remains High post mitigation. While Alternative 2 is strongly preferred from an avifaunal perspective (since fewer turbines should cause fewer collision fatalities) it remains a large wind farm in a highly sensitive area from the avifauna perspective, and the impact significance remains High post mitigation.

In numerical terms, the fatalities estimate for each wind facility/alternative pre-mitigation is summarised in **Table 3-7.** Since the residual impacts remain high post mitigation, the fatalities estimates are used to contextualise the level of offset/compensation that may be needed, using the worst case scenario based on the precautionary principle.

Project	Aspect	Impact
Alternative 1 (70 turbines)	Scenario 1: Rotor Swept Area of 30 m - 230m.	Approximately 18.46 fatalities could be recorded at the wind farm per year across the target bird species recorded flying on site prior to the application of mitigation measures. This includes most notably the following regionally Red Listed species fatalities: Cape Vulture – 10.20 birds/year; Southern Bald Ibis – 1.14 birds/year; Blue Crane – 0.72 birds/year; White-bellied Bustard – 0.26 birds/year
	Scenario 2: Rotor Swept Area of 50 m to 250 m.	A total of approximately 15.64 fatalities could be recorded at the wind farm per year across the target bird species recorded flying on site, prior to the application of mitigation measures. This includes the following regionally Red Listed species fatalities: Cape Vulture – 9.76 birds/year; Southern Bald Ibis – 0.44 birds/year; Blue Crane – 0.68 birds/year; White-bellied Bustard – 0.04 birds/year.
Alternative 2 (44 turbines)	Scenario 3: Rotor Swept Area of 30 m – 230 m	Approximately 11.60 fatalities could be recorded at the wind farm per year across the target bird species recorded flying on site prior to the application of mitigation measures. This includes the following regionally Red Listed species fatalities: Cape Vulture – 6.41 birds/year; Southern Bald Ibis

Table 3-7 –	<b>Bird fatalities</b>	due to	collision	with w	vind turbines	(WildSkies,	2023)
						(	,

	<ul> <li>– 0.71 birds/year; Blue Crane – 0.45 birds/year; White- bellied Bustard – 0.16 birds/year</li> </ul>
Scenario 4: Rotor Swept Area of 50 m to 250 m	A total of approximately 9.83 fatalities could be recorded at the wind farm per year across the target bird species recorded flying on site, prior to the application of mitigation measures. This includes the following regionally Red Listed species fatalities: Cape Vulture – 6.13 birds/year; Southern Bald Ibis – 0.28 birds/year; Blue Crane – 0.43 birds/year; White-bellied Bustard – 0.03 birds/year

These residual impacts will need to be mitigated off site, with an aim of achieving no net loss of affected bird species.

Since an area-based offset for affected bird species is not feasible, the Project will instead need to address other sources of mortality of priority species in a measurable way so as to compensate for the residual effects of the Dalmanutha WEF and West facilities itself. Proposed measures are set out in below; the required measures will need to be agreed with the relevant authorities and conservation agencies, and detailed in a Biodiversity Action Plan thereafter.

Key to the compensation process will be ongoing operation phase monitoring so that the exact number of fatalities can be documented and compensated accordingly.

#### PREFERRED ALTERNATIVE

The preferred alternative for a Project from an offsetting perspective, is typically that which has the least residual impact, and as such requires the least effort in terms of offset. While Alternative 1 is preferable for ecological receptors including terrestrial habitats and aquatic ecosystems, and Alternative 2 currently incurs a greater extent of offset for grassland habitat within CBAs; the critical issue for the Project is the residual impact as a result of collision risk for priority bird species – as such, Alternative 2 is the preferred alternative from an offsetting perspective since the reduced residual impact on priority bird species is of paramount importance.

	Preferred Alternative	
Ecological receptor	Alternative 1	Alternative 2
Wetland habitat	1.95 ha loss	1.45 ha loss - preferred
Terrestrial habitat	56.39 ha loss - preferred	128.86 ha loss – capacity to reduce
Avifauna	Approximately 18.46 fatalities per annum	Approximately 11.60 fatalities per annum - preferred

Table 0 0 - I referred alternative based on reduced field for biodiversity offsetting
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#### **CANDIDATE OFFSET SITES**

Wherever possible, a 'like-for-like' biodiversity offset is preferred so that residual negative impacts on affected biodiversity features are appropriately compensated – ensuring no net loss of that feature on a local or regional scale. In addition, the realities of securing offsets in the long-term depends heavily on securing appropriate areas from a land tenure and/or management perspective. For this reason, the selection of candidate offset sites focussed on nearby habitats within the LSA, where the Project Developer has established relationships with landowners and can capitalise on this for offset planning purposes.

The draft National Biodiversity Offset guideline (DFFE, 2022) requires that the below-listed principles – which are widely recognised in standard offset guidance (e.g. BBOP, 2009) – guide the selection of suitable candidate offset sites; these principles were also applied when identifying potentially suitable areas and required actions for offset:

- Biodiversity offset sites should be selected for ecological equivalence (the "like-for-like" principle) or, where appropriate, there could be "trading-up" to select an area of relatively high or more urgent conservation priority.
- Selection should be guided as far as possible by existing biodiversity priority areas in the landscape (for example, the CBA and ESA network, Freshwater Ecosystem Priority Areas, and focus areas for protected area expansion) and/or areas identified as strategic from an ecological infrastructure perspective (such as Strategic Water Source Areas).
- Biodiversity offsets should strive to secure the best examples of the features which have been impacted and to improve connectivity in the landscape between protected and priority areas for biodiversity.
- The final selection can be influenced by the reasonable consideration of factors other than the biodiversity value of the different candidate sites, such as: ease of the management of the site by a relevant management authority; and threats to conservation due to conflicting land use rights, claims or land use classification.

For biodiversity offsets in terrestrial ecosystems, rehabilitation and preferably restoration of areas in modified condition (i.e. no longer natural or near-natural) is seen as an integral part of the required management of the offset site. The guidelines state it is optimal for candidate biodiversity offset sites to be in a good ecological condition (natural or near-natural state), to minimise the additional burden of having to rehabilitate or restore an area (DFFE, 2022); however, some level of rehabilitation of natural habitats with a low level of disturbance is normally anticipated.

Wetland offsets, on the other hand, are often focussed in systems that are moderately modified, where the greatest potential for functional gain can be feasibly achieved via implementation of a wetland rehabilitation plan.

Candidate offset sites and required biodiversity outcomes for wetland and terrestrial habitat are therefore proposed to include:

Unaffected wetland habitat within the study area:

The presence of extensive areas of modified wetland habitat within the study area, representing each of the HGM units that will be lost, presents an opportunity for implementation of a wetland rehabilitation programme within the study area to compensate wetland loss, through securing functional gains via rehabilitation.

In targeted wetlands, the objective will be to increase the PES score/category through improvement of wetland health as a result of rehabilitation activities, thereby securing functional gains.

Both the ecosystem conservation target and functional ha-eq target will be easily achievable within the study area.

It is envisaged that any necessary wetland offset will be secured via the necessary landowner agreement for the Water Use License that will be required for the implementation of rehabilitation structures/works in wetlands and watercourses. The wetland offset will therefore be done via the WULA process (separate to the EA process).

Unaffected terrestrial habitat within the study area:

Grassland: areas of natural habitat (i.e. Disturbed Grassland, Dry Mixed Grassland, and Rocky Grassland) within the study area; particularly those areas situated within CBA1/CBA2 areas, and adjacent to areas of loss; since landowners of areas where construction will take place are already engaged. The final areas and required extent of offset will be confirmed once the selected Alternative is finalised, final residual impacts quantified, and agreements with landowners secured.

Stewardship agreements with landowners and local communities – support conservation and enhancement of dry mixed, disturbed and rocky grasslands, and linked fauna species, through management and protection of high ecological importance natural grasslands in the study area. Conservation servitudes may be utilised to give effect to landowner agreements.

Areas where land use consists primarily of livestock grazing of open veld, if incorporated into protection-based offset areas, can potentially provide biodiversity support and demonstrate improved ecological integrity in the long-term, if targeted by suitable management plans e.g. grazing management plans, fire management.

The extent of suitable wetland and terrestrial habitat within the study area (candidate offset sites) from which suitable offset sites can be selected, is depicted in **Figure 3-2.** The likelihood of each sites availability and feasibility will need to be established via engagement with landowners, and acceptability as offset for natural habitat loss agreed with relevant stakeholders (e.g. MTPA, EWT, BLSA). Offsite offsets may also be considered, depending on the feedback received through the engagement process.

#### OFFSITE ACTIONS FOR PRIORITY BIRD SPECIES

Since area-based offsets for residual impacts on affected bird species are not feasible, several offsite actions have been proposed in an effort to achieve no net loss of these species. These include:

Partnering with the Dullstroom Bird of Prey and Rehabilitation Centre to rehabilitate injured birds.

Donating 5000 Bird diverters to EWT to target high-risk powerlines every 10 years of the project.

Support of ongoing bird research programmes, particularly for threatened (e.g. White-winged Flufftail) and endemic species, in partnership with universities, and conservation NGOs (e.g. BLSA, EWT).

Support of improved management of current or potential protected areas that are important sites for the species of concern present within the study area.

 Support of existing conservation programmes/sites, such as Middelpunt Wetland Trust Initiative, Verloren Valei Nature Reserve, African Crane Conservation and Threatened grasslands Species Programme.

It is noted that the finalised agreed offsite actions will be included in the Project BAP subject to determination of the final Project layout.

# vsp



Figure 3-2 - Candidate offset areas - unaffected wetland and terrestrial habitat in LSA

### vsp

### 3.5 APPLICABLE DOCUMENTATION

The following documents are to be read in conjunction with the EMPr:

- EIAr for the Proposed Dalmanutha Hybrid Energy Facility;
- Generic EMPR for the development and expansion of substation infrastructure for the transmission and distribution of electricity;
- Generic EMPR for the development and expansion for overhead electricity transmission and distribution infrastructure; and
- EA issued by the DFFE in terms of the NEMA (once issued).

### 4 GOVERNANCE FRAMEWORK

### 4.1 NATIONAL LEGAL AND REGULATORY FRAMEWORK

The South African regulatory framework establishes well-defined requirements and standards for environmental and social management of industrial and civil infrastructure developments. Different authorities at both national and regional levels carry out environmental protection functions. The applicable legislation and policies are shown in **Table 4-1** 

Legislation	Description of Legislation and applicability
The Constitution of South Africa (No. 108 of 1996)	The Constitution cannot manage environmental resources as a stand-alone piece of legislation hence additional legislation has been promulgated to manage the various spheres of both the social and natural environment. Each promulgated Act and associated Regulations are designed to focus on various industries or components of the environment to ensure that the objectives of the Constitution are effectively implemented and upheld in an on-going basis throughout the country. In terms of Section 7, a positive obligation is placed on the State to give effect to the environmental rights.
National Environmental Management Act (No. 107 of 1998)	In terms of Section 24(2) of the NEMA, the Minister may identify activities, which may not commence without prior authorisation. The Minister thus published GNR 983 (as amended) (Listing Notice 1), GNR 984 (as amended) (Listing Notice 2) and GNR 985 (as amended) (Listing Notice 3) listing activities that may not commence prior to authorisation.
	The regulations outlining the procedures required for authorisation are published in the EIA Regulations of 2014 (GNR 982) (as amended). Listing Notice 1 identifies activities that require a BA process to be undertaken, in terms of the EIA Regulations, prior to commencement of that activity. Listing Notice 2 identifies activities that require an S&EIR process to be undertaken, in terms of the EIA Regulations, prior to commencement of that activity. Listing Notice 3 identifies activities within specific areas that require a BA process to be undertaken, in terms of the EIA Regulations, prior to commencement of that activity. Listing Notice 3 identifies activities within specific areas that require a BA process to be undertaken, in terms of the EIA Regulations, prior to commencement of that activity.
	WSP undertook a legal review of the listed activities according to the proposed project description to conclude that the activities listed in in this section are considered applicable to the development: A S&EIR process must be followed. An EA is required and will be applied for with the DFFE.
Listing Notice 1:	Activity 11(i): –
GNR 983	The development of facilities or infrastructure for the transmission and distribution of electricity—
	<i>(i)</i> outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts; or
	(ii) inside urban areas or industrial complexes with a capacity of 275 kilovolts or more;
	excluding the development of bypass infrastructure for the transmission and distribution of electricity where such bypass infrastructure is —
	(a) temporarily required to allow for maintenance of existing infrastructure;
	(b) 2 kilometres or shorter in length;
	(c) within an existing transmission line servitude; and

#### Table 4-1 - Applicable National Legislation

(d) will be removed within 18 months of the commencement of development.         Description:         This activity will be triggered as the project is located outside of an urban area and including a 33/132kV step-up transformer, and an over the fence 132kV cable to connect the onsite IPP substation to the Common Collector Switching Station as part of the infrastructure.         Listing Notice 1:       Activity 12(i)(a)(c):         The development of—        (i) dams or weirs, where the dam or weir, including infrastructure and water surface area, exceeds 100 square metres; or          (ii) infrastructure or structures with a physical footprint of 100 square metres or more        (a) within a watercourse;          (b) in front of a development setback; or        (c) if no development setback; or          (c) if no development setback exists, within 32 metres of a watercourse, measured from         the edge of a watercourse.          (a) the development of infrastructure or structures within existing ports or harbour;         (b) where such development activities are related to the development of a port or         harbour, in which case activity 26 in Listing Notice 2 of 2014 applies;         (cc) activities listed in activity 14 in Listing Notice 2 of 2014 applies;         (d) where such development occurs within a urban area; [or]         (e) where such development occurs within a urban area; [or]         (e) where such development occurs within a urban area; [or]         (e) where such development occurs within a urban area; [or]         (f) the development of temporary infrastructure or structures where such infrastructure         or structures will be removed within 6 weeks of the	Legislation	Description of Legislation and applicability
Listing Notice 1: GNR 983       Activity 12(ii)(a)(c): The development of— <ul> <li>(i) dams or weirs, where the dam or weir, including infrastructure and water surface area, exceeds 100 square metres; or</li> <li>(ii) infrastructure or structures with a physical footprint of 100 square metres or more</li> <li>(a) within a watercourse;</li> <li>(b) in front of a development setback; or</li> <li>(c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse.</li> <li>excluding—</li></ul>		<ul> <li>(d) will be removed within 18 months of the commencement of development.</li> <li>Description:</li> <li>This activity will be triggered as the project is located outside of an urban area and includes internal grid infrastructure with a capacity of up to 33kV, an onsite IPP substation including a 33/132kV step-up transformer, and an over the fence 132kV cable to connect the onsite IPP substation to the Common Collector Switching Station as part of the infrastructure.</li> </ul>
GNR 983       The development of— <ul> <li>(i) dams or weirs, where the dam or weir, including infrastructure and water surface area, exceeds 100 square metres; or</li> <li>(ii) infrastructure or structures with a physical footprint of 100 square metres or more</li> <li>(a) within a watercourse;</li> <li>(b) in front of a development setback; or</li> <li>(c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse.</li> <li>excluding—</li></ul>	Listing Notice 1:	Activity 12(ii)(a)(c):
(i) dams or weirs, where the dam or weir, including infrastructure and water surface area, exceeds 100 square metres; or         (ii) infrastructure or structures with a physical footprint of 100 square metres or more         (a) within a watercourse;         (b) in front of a development setback; or         (c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse.         excluding—         (aa) the development of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour;         (b) where such development activities are related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies;         (cc) activities listed in activity 14 in Listing Notice 2 of 2014 or activity 14 in Listing Notice 3 of 2014, in which case activity 26 in Listing roads, [or] road reserves or railway line reserves; or         (ff) the development of temporary infrastructure or structures where such infrastructure or structures will be removed within 6 weeks of the commencement of development and where indigenous vegetation will not be cleared.         Description:         The Facility will require the development of internal roads and/or access roads around the site. The physical footprint of internal access roads and electrical cabling required to connect the various components of the Facility will either traverse the delineated watercourses on site, or be located within 32m of the outer extent of the delineated watercourses on site.         Listing Notice 1:       Cotivity 14:         G	GNR 983	The development of—
<ul> <li>(ii) infrastructure or structures with a physical footprint of 100 square metres or more         <ul> <li>(a) within a watercourse;</li> <li>(b) in front of a development setback; or</li> <li>(c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse.</li> <li>excluding—</li></ul></li></ul>		(i) dams or weirs, where the dam or weir, including infrastructure and water surface area, exceeds 100 square metres; or
(a) within a watercourse;(b) in front of a development setback; or(c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse.excluding—(aa) the development of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour;(bb) where such development activities are related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies;(cc) activities listed in activity 14 in Listing Notice 2 of 2014 or activity 14 in Listing Notice 3 of 2014, in which case that activity applies;(dd) where such development occurs within an urban area; [or](ee) where such development occurs within existing roads, [or] road reserves or railway line reserves; or(ff) the development of temporary infrastructure or structures where such infrastructure or structures will be removed within 6 weeks of the commencement of development and 		(ii) infrastructure or structures with a physical footprint of 100 square metres or more
(b) in front of a development setback; or(c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse.excluding—(aa) the development of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour;(bb) where such development activities are related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies;(cc) activities listed in activity 14 in Listing Notice 2 of 2014 or activity 14 in Listing Notice 3 of 2014, in which case that activity applies;(dd) where such development occurs within an urban area; [or](ee) where such development occurs within existing roads, [or] road reserves or railway line reserves; or(ff) the development of temporary infrastructure or structures where such infrastructure or structures will be removed within 6 weeks of the commencement of development and where indigenous vegetation will not be cleared.Description: The Facility will require the development of internal roads and/or access roads around the site. The physical footprint of internal access roads and electrical cabling required to watercourses on site, or be located within 32m of the outer extent of the delineated watercourses on site.Listing Notice 1: GNR 983Activity 14: The development and related operation of facilities or infrastructure, for the storage, or for the storage and handling, of a dangerous good, where such storage occurs in containers with a combined capacity of 80 cubic metres or more but not exceeding 500 cubic metres.Description:		(a) within a watercourse;
(c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse.         excluding—         (aa) the development of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour;         (bb) where such development activities are related to the development of a port or harbour; in which case activity 26 in Listing Notice 2 of 2014 applies;         (cc) activities listed in activity 14 in Listing Notice 2 of 2014 or activity 14 in Listing Notice 3 of 2014, in which case that activity applies;         (dd) where such development occurs within an urban area; [or]         (ee) where such development occurs within existing roads, [or] road reserves or railway line reserves; or         (ff) the development of temporary infrastructure or structures where such infrastructure or structures will be removed within 6 weeks of the commencement of development and where indigenous vegetation will not be cleared.         Description:         The Facility will require the development of internal access roads and electrical cabling required to connect the various components of the Facility will either traverse the delineated watercourses on site.         Listing Notice 1:       Activity 14:         GNR 983       The development and related operation of facilities or infrastructure, for the storage, or for the storage and handling, of a dangerous good, where such storage occurs in containers with a combined capacity of 80 cubic metres or more but not exceeding 500 cubic metres.         Description:       Description: <th></th> <th>(b) in front of a development setback; or</th>		(b) in front of a development setback; or
Listing Notice 1: GNR 983Activity 14: The development and related operation of facilities or infrastructure, for the storage occurs in combined capacity of 80 cubic metres. Description:		(c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse.
(aa) the development of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour;(bb) where such development activities are related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies;(cc) activities listed in activity 14 in Listing Notice 2 of 2014 or activity 14 in Listing Notice 3 of 2014, in which case that activity applies;(dd) where such development occurs within an urban area; [or](ee) where such development occurs within existing roads, [or] road reserves or railway line reserves; or(ff) the development of temporary infrastructure or structures where such infrastructure or structures will be removed within 6 weeks of the commencement of development and where indigenous vegetation will not be cleared.Description: The Facility will require the development of internal roads and/or access roads around the site. The physical footprint of internal access roads and electrical cabling required to connect the various components of the Facility will either traverse the delineated watercourses on site, or be located within 32m of the outer extent of the delineated watercourses on site.Listing Notice 1: GNR 983Activity 14: The development and related operation of facilities or infrastructure, for the storage occurs in containers with a combined capacity of 80 cubic metres or more but not exceeding 500 cubic metres. Description:		excluding-
(bb) where such development activities are related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies; (cc) activities listed in activity 14 in Listing Notice 2 of 2014 or activity 14 in Listing Notice 3 of 2014, in which case that activity applies; (dd) where such development occurs within an urban area; [or] (ee) where such development occurs within existing roads, [or] road reserves or railway line reserves; or (ff) the development of temporary infrastructure or structures where such infrastructure or structures will be removed within 6 weeks of the commencement of development and where indigenous vegetation will not be cleared.Description: The Facility will require the development of internal roads and/or access roads around the site. The physical footprint of internal access roads and electrical cabling required to connect the various components of the Facility will either traverse the delineated watercourses on site, or be located within 32m of the outer extent of the delineated watercourses on site.Listing Notice 1: GNR 983Activity 14: The development and related operation of facilities or infrastructure, for the storage, or for the storage and handling, of a dangerous good, where such storage occurs in containers with a combined capacity of 80 cubic metres or more but not exceeding 500 cubic metres. Description:		(aa) the development of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour;
Listing Notice 1: GNR 983Activity 14: Activity 14: The development and related operation of facilities or infrastructure, for the storage and handling, of a dangerous good, where such storage occurs in combined capacity of 80 cubic metres.Listing Notice 1: GNR 983Activity 14: Activity 14: The development and related operation of 80 cubic metres or more but not exceeding 500 cubic metres.		(bb) where such development activities are related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies;
(dd) where such development occurs within an urban area; [or](ee) where such development occurs within existing roads, [or] road reserves or railway line reserves; or(ff) the development of temporary infrastructure or structures where such infrastructure or structures will be removed within 6 weeks of the commencement of development and where indigenous vegetation will not be cleared.Description: The Facility will require the development of internal roads and/or access roads around the site. The physical footprint of internal access roads and electrical cabling required to connect the various components of the Facility will either traverse the delineated watercourses on site, or be located within 32m of the outer extent of the delineated watercourses on site.Listing Notice 1: GNR 983Activity 14: The development and related operation of facilities or infrastructure, for the storage, or for the storage and handling, of a dangerous good, where such storage occurs in containers with a combined capacity of 80 cubic metres or more but not exceeding 500 cubic metres. Description:		(cc) activities listed in activity 14 in Listing Notice 2 of 2014 or activity 14 in Listing Notice 3 of 2014, in which case that activity applies;
(ee) where such development occurs within existing roads, [or] road reserves or railway line reserves; or(ff) the development of temporary infrastructure or structures where such infrastructure or structures will be removed within 6 weeks of the commencement of development and where indigenous vegetation will not be cleared.Description: The Facility will require the development of internal roads and/or access roads around the site. The physical footprint of internal access roads and electrical cabling required to connect the various components of the Facility will either traverse the delineated watercourses on site, or be located within 32m of the outer extent of the delineated watercourses on site.Listing Notice 1: GNR 983Activity 14: The development and related operation of facilities or infrastructure, for the storage, or for the storage and handling, of a dangerous good, where such storage occurs in containers with a combined capacity of 80 cubic metres or more but not exceeding 500 cubic metres. Description:		(dd) where such development occurs within an urban area; [or]
(ff) the development of temporary infrastructure or structures where such infrastructure or structures will be removed within 6 weeks of the commencement of development and where indigenous vegetation will not be cleared.Description: The Facility will require the development of internal roads and/or access roads around the site. The physical footprint of internal access roads and electrical cabling required to connect the various components of the Facility will either traverse the delineated watercourses on site, or be located within 32m of the outer extent of the delineated watercourses on site.Listing Notice 1: GNR 983Activity 14: The development and related operation of facilities or infrastructure, for the storage, or for the storage and handling, of a dangerous good, where such storage occurs in containers with a combined capacity of 80 cubic metres or more but not exceeding 500 cubic metres.Description:		(ee) where such development occurs within existing roads, [or] road reserves or railway line reserves; or
Description:The Facility will require the development of internal roads and/or access roads around the site. The physical footprint of internal access roads and electrical cabling required to connect the various components of the Facility will either traverse the delineated watercourses on site, or be located within 32m of the outer extent of the delineated watercourses on site.Listing Notice 1: GNR 983Activity 14: The development and related operation of facilities or infrastructure, for the storage, or for the storage and handling, of a dangerous good, where such storage occurs in containers with a combined capacity of 80 cubic metres or more but not exceeding 500 cubic metres.Description:		(ff) the development of temporary infrastructure or structures where such infrastructure or structures will be removed within 6 weeks of the commencement of development and where indigenous vegetation will not be cleared.
Listing Notice 1: GNR 983Activity 14: The development and related operation of facilities or infrastructure, for the storage, or for the storage and handling, of a dangerous good, where such storage occurs in containers with a combined capacity of 80 cubic metres or more but not exceeding 500 cubic metres.Description:		Description:
Listing Notice 1: GNR 983Activity 14: The development and related operation of facilities or infrastructure, for the storage, or for the storage and handling, of a dangerous good, where such storage occurs in containers with a combined capacity of 80 cubic metres or more but not exceeding 500 cubic metres.Description:		The Facility will require the development of internal roads and/or access roads around the site. The physical footprint of internal access roads and electrical cabling required to connect the various components of the Facility will either traverse the delineated watercourses on site, or be located within 32m of the outer extent of the delineated watercourses on site.
GNR 983The development and related operation of facilities or infrastructure, for the storage, or for the storage and handling, of a dangerous good, where such storage occurs in containers with a combined capacity of 80 cubic metres or more but not exceeding 500 cubic metres.Description:	Listing Notice 1:	Activity 14:
Description:	GNR 983	The development and related operation of facilities or infrastructure, for the storage, or for the storage and handling, of a dangerous good, where such storage occurs in containers with a combined capacity of 80 cubic metres or more but not exceeding 500 cubic metres.
		Description:

Legislation	Description of Legislation and applicability
	The Facility will require storage and handling of dangerous goods, including fuel, cement, and chemical storage onsite, that will be greater than 80m <sup>3</sup> but not exceeding 500m <sup>3</sup> . This activity will also be applicable in the event that Redox Flow Battery technology is considered preferred.
Listing Notice 1:	Activity 19:
GNR 983	The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse.
	but excluding where such infilling, depositing, dredging, excavation, removal or moving-
	(a) will occur behind a development setback;
	(b) is for maintenance purposes undertaken in accordance with a maintenance management plan;
	(c) falls within the ambit of activity 21 in this Notice, in which case that activity applies;
	(d) occurs within existing ports or harbours that will not increase the development footprint of the port or harbour; or
	(e) where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies.
	Description:
	Internal access roads and stormwater control infrastructure, as well as electrical cabling required to connect the various components of the Facility will collectively require the excavation, infilling or removal of soil exceeding 10m <sup>3</sup> from delineated watercourses on site. The exact values will be confirmed once final designs have been provided.
Listing Notice 1:	Activity 24(ii):
GNR 983	The development of a road:
	(i) for which an environmental authorisation was obtained for the route determination in terms of activity 5 in Government Notice 387 of 2006 or activity 18 in Government Notice 545 of 2010; or
	(ii) A road with a reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 metres
	but excluding a road—
	a) which is identified and included in activity 27 in Listing Notice 2 of 2014;
	(b) where the entire road falls within an urban area; or
	(c) which is 1 kilometre or shorter
	Description:
	Internal access roads required by the Facility will be between 8m and 10m wide this can be increased to 12m on bends. The total length of the roads will be approximately 60km.
Listing Notice 1:	Activity 28(ii):
GNR 983	Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development:

Legislation	Description of Legislation and applicability
	(i) will occur inside an urban area, where the total land to be developed is bigger than 5 hectares; or
	(ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare.
	excluding where such land has already been developed for residential, mixed, retail, commercial, industrial or institutional purposes.
	Description:
	The Facility is considered a commercial and/or industrial development, and is located on several farm portions zoned for agricultural use outside an urban area, used for agricultural purposes. The total area to be developed for the Facility (buildable area) is approximately 400ha (i.e. greater than 1 hectare).
Listing Notice 1:	Activity 30:
GNR 983	Any process or activity identified in terms of section 53(1) of the National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004).
	Description:
	The Facility infrastructure is located within, and will require vegetation clearance or disturbance of Eastern Highveld Grassland. This ecosystem is confirmed to be listed in the National List of Ecosystems that are Threated and in Need of Protection (as indicated in GNR 1002 of 9 December 2011). Due to the fact that this ecosystem is listed as threatened, it is assumed that various threatened or protected species may be found within the development area. The restricted activity of "cutting, chopping off, uprooting, damaging or destroying, any specimen" has been identified in terms of NEM:BA and is
	therefore applicable to the vegetation clearance that will be required to construct the development. Considering this, Activity 30 is considered applicable.
Listing Notice 1:	therefore applicable to the vegetation clearance that will be required to construct the development. Considering this, Activity 30 is considered applicable.
Listing Notice 1: GNR 983	therefore applicable to the vegetation clearance that will be required to construct the development. Considering this, Activity 30 is considered applicable.          Activity 48(i)(a)(c):         The expansion of—
Listing Notice 1: GNR 983	therefore applicable to the vegetation clearance that will be required to construct the development. Considering this, Activity 30 is considered applicable.          Activity 48(i)(a)(c):         The expansion of—         (i) infrastructure or structures where the physical footprint is expanded by 100 square metres or more; or
Listing Notice 1: GNR 983	therefore applicable to the vegetation clearance that will be required to construct the development. Considering this, Activity 30 is considered applicable.          Activity 48(i)(a)(c):         The expansion of—       (i) infrastructure or structures where the physical footprint is expanded by 100 square metres or more; or         (ii) dams or weirs, where the dam or weir, including infrastructure and water surface area, is expanded by 100 square metres or more
Listing Notice 1: GNR 983	therefore applicable to the vegetation clearance that will be required to construct the development. Considering this, Activity 30 is considered applicable.          Activity 48(i)(a)(c):         The expansion of—       (i) infrastructure or structures where the physical footprint is expanded by 100 square metres or more; or         (ii) dams or weirs, where the dam or weir, including infrastructure and water surface area, is expanded by 100 square metres or more         where such expansion occurs—
Listing Notice 1: GNR 983	therefore applicable to the vegetation clearance that will be required to construct the development. Considering this, Activity 30 is considered applicable.          Activity 48(i)(a)(c):         The expansion of—       (i) infrastructure or structures where the physical footprint is expanded by 100 square metres or more; or         (ii) dams or weirs, where the dam or weir, including infrastructure and water surface area, is expanded by 100 square metres or more         where such expansion occurs—         (a) within a watercourse;
Listing Notice 1: GNR 983	therefore applicable to the vegetation clearance that will be required to construct the development. Considering this, Activity 30 is considered applicable.          Activity 48(i)(a)(c):         The expansion of—       (i) infrastructure or structures where the physical footprint is expanded by 100 square metres or more; or         (ii) dams or weirs, where the dam or weir, including infrastructure and water surface area, is expanded by 100 square metres or more         where such expansion occurs—         (a) within a watercourse;         (b) in front of a development setback; or
Listing Notice 1: GNR 983	<ul> <li>therefore applicable to the vegetation clearance that will be required to construct the development. Considering this, Activity 30 is considered applicable.</li> <li><u>Activity 48(i)(a)(c):</u> The expansion of— <ul> <li>(i) infrastructure or structures where the physical footprint is expanded by 100 square metres or more; or</li> <li>(ii) dams or weirs, where the dam or weir, including infrastructure and water surface area, is expanded by 100 square metres or more <ul> <li>(where such expansion occurs—</li> <li>(a) within a watercourse;</li> <li>(b) in front of a development setback; or</li> <li>(c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse;</li> </ul> </li> </ul></li></ul>
Listing Notice 1: GNR 983	<ul> <li>therefore applicable to the vegetation clearance that will be required to construct the development. Considering this, Activity 30 is considered applicable.</li> <li><u>Activity 48(i)(a)(c):</u> The expansion of— <ul> <li>(i) infrastructure or structures where the physical footprint is expanded by 100 square metres or more; or</li> <li>(ii) dams or weirs, where the dam or weir, including infrastructure and water surface area, is expanded by 100 square metres or more <ul> <li>where such expansion occurs—</li> <li>(a) within a watercourse;</li> <li>(b) in front of a development setback; or</li> <li>(c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse;</li> </ul> </li> </ul></li></ul>
Listing Notice 1: GNR 983	<ul> <li>therefore applicable to the vegetation clearance that will be required to construct the development. Considering this, Activity 30 is considered applicable.</li> <li><u>Activity 48(i)(a)(c):</u> The expansion of— <ul> <li>(i) infrastructure or structures where the physical footprint is expanded by 100 square metres or more; or</li> <li>(ii) dams or weirs, where the dam or weir, including infrastructure and water surface area, is expanded by 100 square metres or more <ul> <li>(ii) dams or weirs, where the dam or weir, including infrastructure and water surface area, is expanded by 100 square metres or more</li> <li>(ii) dams or weirs, or</li> <li>(iii) dams or weirs, where the dam or weir, including infrastructure and water surface area, is expanded by 100 square metres or more</li> <li>(i) where such expansion occurs—</li> <li>(a) within a watercourse;</li> <li>(b) in front of a development setback; or</li> <li>(c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse;</li> <li>(a) the expansion of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour;</li> </ul> </li> </ul></li></ul>
Listing Notice 1: GNR 983	<ul> <li>therefore applicable to the vegetation clearance that will be required to construct the development. Considering this, Activity 30 is considered applicable.</li> <li><u>Activity 48(i)(a)(c):</u> The expansion of— <ul> <li>(i) infrastructure or structures where the physical footprint is expanded by 100 square metres or more; or</li> <li>(ii) dams or weirs, where the dam or weir, including infrastructure and water surface area, is expanded by 100 square metres or more <ul> <li>where such expansion occurs—</li> <li>(a) within a watercourse;</li> <li>(b) in front of a development setback; or</li> <li>(c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse;</li> <li>excluding—</li> <li>(aa) the expansion of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour;</li> <li>(bb) where such expansion activities are related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies;</li> </ul> </li> </ul></li></ul>
Listing Notice 1: GNR 983	<ul> <li>therefore applicable to the vegetation clearance that will be required to construct the development. Considering this, Activity 30 is considered applicable.</li> <li><u>Activity 48(i)(a)(c):</u> The expansion of— </li> <li>(i) infrastructure or structures where the physical footprint is expanded by 100 square metres or more; or </li> <li>(ii) dams or weirs, where the dam or weir, including infrastructure and water surface area, is expanded by 100 square metres or more where such expansion occurs— (a) within a watercourse; (b) in front of a development setback; or (c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse; excluding— (aa) the expansion of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour; (b) where such expansion activities are related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 or activity 14 in Listing Notice 3 of 2014, in which case that activity applies;</li></ul>

Legislation	Description of Legislation and applicability	
	(ee) where such expansion occurs within existing roads, road reserves or railway line reserves.	
	Description:	
	Transport of large infrastructure components related to the facility will require the expansion of existing access and/or internal roads, culverts or similar drainage crossing infrastructure collectively exceeding 100m <sup>2</sup> or more beyond existing road or road reserves located within delineated watercourses on site, or within 32m of the outer extent of the delineated watercourses on site.	
Listing Notice 1:	Activity 56(i)(ii):	
GNR 983	The widening of a road by more than 6 metres, or the lengthening of a road by more than 1 kilometre—	
	(i) where the existing reserve is wider than 13,5 meters; or	
	(ii) where no reserve exists, where the existing road is wider than 8 metres;	
	excluding where widening or lengthening occur inside urban areas.	
	Description:	
	Transport of large infrastructure components related to the facility will require the widening of existing access and/or internal roads where no reserve exists and where such road is wider than 8 metres.	
Listing Notice 2:	Activity 1:	
GNR 984	The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more, excluding where such development of facilities or infrastructure is for photovoltaic installations and occurs —	
	(a) within an urban area; or	
	(b) on existing infrastructure.	
	Description:	
	This activity will be triggered by the Dalmanutha WEF as the proposed energy generation technologies will generate more than 20MW of electricity output from a renewable resource. The proposed facility is located outside of an urban area.	
Listing Notice 2:	Activity 15:	
GNR 984	The clearance of an area of 20 hectares or more of indigenous vegetation, excluding where such clearance of indigenous vegetation is required for—	
	(i) the undertaking of a linear activity; or	
	(ii) maintenance purposes undertaken in accordance with a maintenance management plan.	
	Description:	
	This activity will be triggered by the Dalmanutha WEF as it will result in the clearance of at least 20 hectares or more of indigenous vegetation.	
Listing Notice 3:	Activity 4 (f)(i)(bb)(cc)(ee)(gg):	
GNR 985	The development of a road wider than 4 metres with a reserve less than 13,5 metres.	

Legislation	Description of Legislation and applicability
	f. Mpumalanga
	i. Outside urban areas:
	(bb) National Protected Area Expansion Strategy Focus areas;
	(cc) Sensitive areas as identified in an environmental management framework as contemplated in chapter 5 of the Act and as adopted by the competent authority;
	(ee) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans;
	(gg) Areas within 10 kilometres from national parks or world heritage sites or 5 kilometres from any other protected area identified in terms of NEMPAA or from the core areas of a biosphere reserve, excluding disturbed areas, where such areas comprise indigenous vegetation; or
	Description:
	Internal access roads required by the Facility will be between 8m and 10m wide, and approximately 60km in length. Where required for turning circle/bypass areas, however, access or internal roads may be up to 12m to allow for larger component transport. The exact values will be confirmed once final designs have been provided.
	The facility is located within 5km of one Protected Area registered as a designated Protected Area in the South African Protected Area Database (SAPAD 2022 Q1), namely, the Nooitgedacht Dam Nature Reserve.
	Furthermore, roads required for the Facility will be located within, and will require vegetation clearance or disturbance of Eastern Highveld Grassland. This ecosystem is listed in the National List of Ecosystems that are Threatened and in need of Protection (GNR 1002 of 9 December 2011), and subsequently listed in terms of the National Environmental Management:
	Biodiversity Act, 2004 (Act No. 10 of 2004).
	Similarly, roads required for the Facility will be located within, and will require vegetation clearance or disturbance within a National Protected Area Expansion Strategy Focus area and Critical Biodiversity Areas (CBA)
Listing Notice 3:	Activity 10 (f)(i)( bb)(cc)(ee)(gg)(hh):
GNR 985	The development and related operation of facilities or infrastructure for the storage, or storage and handling of a dangerous good, where such storage occurs in containers with a combined capacity of 30 but not exceeding 80 cubic metres.
	f. Mpumalanga
	i. Outside urban areas:
	(bb) National Protected Area Expansion Strategy Focus areas;
	(cc) Sensitive areas as identified in an environmental management framework as contemplated in chapter 5 of the Act and as adopted by the competent authority;
	(ee) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans;
	(gg) Areas within 10 kilometres from national parks or world heritage sites or 5 kilometres from any other protected area identified in terms of NEMPAA or from the core areas of a biosphere reserve, where such areas comprise indigenous vegetation; or
	(hh) Areas within a watercourse or wetland, or within 100 metres of a watercourse or wetland;

Legislation	Description of Legislation and applicability
•	Description:
	The Facility will require storage and handling of dangerous goods, including fuel, cement, and chemical storage onsite, that will be greater than 30m <sup>3</sup> but not exceeding 80m <sup>3</sup> if Redox Flow Battery technology is not considered preferred.
	The facility is located within 5km of one Protected Area registered as a designated Protected Area in the South African Protected Area Database (SAPAD 2022 Q1), namely, the Nooitgedacht Dam Nature Reserve.
	Furthermore, storage contemplated above will be located within, and will require vegetation clearance or disturbance of, Eastern Highveld Grassland, this ecosystem of which is listed in the National List of Ecosystems that are Threatened and in need of Protection (GNR 1002 of 9 December 2011), and subsequently listed in terms of the National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004).
	Similarly, storage contemplated above will be located within, and will require vegetation clearance or disturbance within National Protected Area Expansion Strategy Focus areas and Critical Biodiversity Areas (CBA) as well as being located within 100m of the outer extent of the delineated watercourses on site.
Listing Notice 3:	Activity 12(f)(i)(ii):
GNR 985	The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of Indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan.
	f.Mpumalanga
	(i) Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004;
	(ii) Within critical biodiversity areas identified in bioregional plans;
	Description:
	The clearance required for the Facility will be approximately 400ha of indigenous vegetation. Such clearance will be in excess of 300m <sup>2</sup> and be partly located within Eastern Highveld Grassland, which is listed in the National List of Ecosystems that are Threatened and in need of Protection (GNR 1002 of 9 December 2011), and subsequently listed in terms of the National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004).
	Similarly, vegetation clearance required for the Facility will be located within Critical Biodiversity Areas (CBA) and Ecological Support Areas (ESA), in excess of 300m <sup>2</sup> .
Listing Notice 3:	Activity 14(ii)(a)(c)(f)(i)(bb)(dd)(ff)(hh):
GNR 985	The development of—
	(ii) infrastructure or structures with a Physical footprint of 10 Square metres or more; where such development occurs—
	(a) within a watercourse;
	(c) if no development setback has been adopted, within 32 metres of a watercourse, measured from the edge of a watercourse;
	f. Mpumalanga
	i. Outside urban areas:

Legislation	Description of Legislation and applicability	
•	(bb) National Protected Area Expansion Strategy Focus areas;	
	(dd) Sensitive areas as identified in an environmental management framework as contemplated in chapter 5 of the Act and as adopted by the competent authority;	
	(ff) Critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans;	
	(hh) Areas within 10 kilometres from national parks or world heritage sites or 5 kilometres from any other protected area identified in terms of NEMPAA or from the core area of a biosphere reserve, where such areas comprise indigenous vegetation;	
	Description:	
	The Facility will require the development of internal roads and/or access roads around the site. The physical footprint of internal access roads, stormwater control infrastructure and electrical cabling required to connect the various components of the Facility will either traverse the delineated watercourses on site, or be located within 32m of the outer extent of the delineated watercourses on site.	
	The facility is located within 5km of one Protected Area registered as a designated Protected Areas in the South African Protected Area Database (SAPAD 2022 Q1), namely, the Nooitgedacht Dam Nature Reserve.	
	Furthermore, the physical footprint of internal access roads, stormwater control infrastructure and electrical cabling required to connect the various components of the Facility will be located within Eastern Highveld Grassland, which is listed in the National List of Ecosystems that are Threatened and in need of Protection (GNR 1002 of 9 December 2011), and subsequently listed in terms of the National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004).	
	Finally, the physical footprint of internal access roads, stormwater control infrastructure and electrical cabling required to connect the various components of the Facility will be located within a National Protected Area Expansion Strategy Focus area, as well as Critical Biodiversity Areas (CBA) and Ecological Support Areas (ESA).	
Listing Notice 3: GNR 985	Activity 18 (f)(i)(bb)(cc)(ee)(gg):	
	The widening of a road by more than 4 metres, or the lengthening of a road by more than 1 kilometre.	
	f. Mpumalanga	
	i. Outside urban areas:	
	(bb) National Protected Area Expansion Strategy Focus areas;	
	(cc) Sensitive areas as identified in an environmental management framework as contemplated in chapter 5 of the Act and as adopted by the competent authority;	
	(ee) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans;	
	(gg) Areas within 10 kilometres from national parks or world heritage sites or 5 kilometres from any other protected area identified in terms of NEMPAA or from the core area of a biosphere reserve, where such areas comprise indigenous vegetation;	
	Description:	
	Transport of large infrastructure components related to the facility will require the widening of existing access and/or internal roads by more than 4 metres or the lengthening of existing access and/or internal roads by more than 1km within the Mpumalanga Province and outside urban areas.	
Legislation	Description of Legislation and applicability	
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	The facility is located within 5km of one Protected Area registered as a designated Protected Area in the South African Protected Area Database (SAPAD 2022 Q1), namely, the Nooitgedacht Dam Nature Reserve	
	Furthermore, such widening will occur within Eastern Highveld Grassland, which is listed in the National List of Ecosystems that are Threatened and in need of Protection (GNR 1002 of 9 December 2011), and subsequently listed in terms of the National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004).	
	Finally, such widening will be located within a National Protected Area Expansion Strategy Focus area and Critical Biodiversity Areas (CBA).	
Listing Notice 3:	Activity 23(ii)(a)(c)(f)(i)(bb)(cc)(ee)(qq):	
GNR 985	The expansion of—	
	(ii) infrastructure or structures where the physical footprint is expanded by 10 square metres or more; where such expansion occurs —	
	(a) within a watercourse;	
	(c) if no development setback has been adopted, within 32 metres of a watercourse, measured from the edge of a watercourse;	
	f. Mpumalanga	
	i. Outside urban areas:	
	(bb) National Protected Area Expansion Strategy Focus areas;	
	(cc) Sensitive areas as identified in an environmental management framework as contemplated in chapter 5 of the Act and as adopted by the competent authority;	
	(ee) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans;	
	(gg) Areas within 10 kilometres from national parks or world heritage sites or 5 kilometres from any other protected area identified in terms of NEMPAA or from the core area of a biosphere reserve, where such areas comprise indigenous vegetation;	
	Description:	
	The Facility will require the expansion of existing internal roads and/or access roads around the site. The physical footprint of the expansion activities will either traverse the delineated watercourses on site, or be located within 32m of the outer extent of the delineated watercourses on site.	
	The facility is located within 5km of one Protected Area registered as a designated Protected Area in the South African Protected Area Database (SAPAD 2022 Q1), namely, the Nooitgedacht Dam Nature Reserve.	
	Furthermore, the physical footprint of the expansion activities will be located within Eastern Highveld Grassland, this ecosystem of which is listed in the National List of Ecosystems that are Threatened and in need of Protection (GNR 1002 of 9 December 2011), and subsequently listed in terms of the National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004).	
	Finally, the physical footprint of the expansion activities will be located within a National Protected Area Expansion Strategy Focus area, as well as Critical Biodiversity Areas (CBA) and Ecological Support Areas (ESA).	

Legislation	Description of Legislation and applicability	
Procedures for the Assessment and Minimum Criteria for Reporting on Identified Environmental Themes (GNR 320, 20 March 2020 and GNR 1150, 30 October 2020)	The protocols provide the criteria for specialist assessment and minimum report content requirements for impacts for various environmental themes for activities requiring environmental authorisation.	
	The protocols replace the requirements of Appendix 6 of the EIA Regulations, 2014, as amended. The assessment and reporting requirements of the protocols are associated with a level of environmental sensitivity identified by the national web based environmental screening tool (screening tool). The Screening Reports were generated for both project alternatives The following environmental themes were applicable to the Dalmanutha WEF-Alternative 1: Agricultural Theme Animal Species Theme Aquatic Biodiversity Theme Avian (Wind) theme Bats (Wind) theme Defence Theme Flicker Theme Palaeontology Theme Plant Species Theme Landscape (Wind theme) Terrestrial Biodiversity Theme	
	<ul> <li>Agriculture Theme</li> <li>Animal Species Theme</li> <li>Aquatic Biodiversity Theme</li> <li>Archaeological and Cultural</li> <li>Heritage Theme</li> <li>Avian Theme</li> <li>Civil Aviation (Solar PV) Theme</li> <li>Defence Theme</li> <li>Landscape (Solar) Theme</li> <li>Palaeontology Theme</li> <li>Plant Species Theme</li> <li>RFI Theme</li> <li>Terrestrial Biodiversity Theme</li> </ul>	
National Environmental Management: Waste Act (59 of 2008) (NEM:WA)	This Act provides for regulating waste management in order to protect health and the environment by providing reasonable measures for the prevention of pollution and ecological degradation. The Act also provides for the licensing and control of waste management activities through GNR. 921 (2013): List of Waste Management Activities that Have, or are Likely to Have, a Detrimental Effect on the Environment. The proposed project does not constitute a Listed Activity requiring a Waste Management Licence (WML) as defined in GNR 921. However, the contents of this EMPR and the associated EIAr which is included as include reasonable measures for the prevention of pollution and good international industry	
	reasonable measures for the prevention of pollution and good international industry practice (GIIP).	

Legislation	Description of Legislation and applicability	
National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004)	The National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004) (NEMBA) was promulgated in June 2004 within the framework of NEMA to provide for the management and conservation of national biodiversity. The NEMBA's primary aims are for the protection of species and ecosystems that warrant national protection, the sustainable use of indigenous biological resources, the fair and equitable sharing of benefits arising from bioprospecting involving indigenous biological resources. In addition, the NEMBA provides for the establishment and functions of a South African National Biodiversity Institute (SANBI).	
	SANBI was established by the NEMBA with the primary purpose of reporting on the status of the country's biodiversity and conservation status of all listed threatened or protected species and ecosystems.	
	The biodiversity assessment identifies CBAs which represent biodiversity priority areas which should be maintained in a natural to near natural state. The CBA maps indicate the most efficient selection and classification of land portions requiring safeguarding in order to meet national biodiversity objectives.	
	Based on the preliminary desktop assessment and the terrestrial ecology report, a significant part of the Project Area falls within CBA (Irreplaceable and Optimal) and a large wetland area adjacent and to the north of the Vaal River (near the southern part of the site) is mapped as an Ecological Support Area (ESA).	
	According to the description for the MBSP Terrestrial Assessment categories, CBAs are areas that are required to meet biodiversity targets (for biodiversity pattern and ecological process features). The management approach is that they should remain in a natural state. CBAs are areas of high biodiversity value which are usually at risk of being lost and usually identified as important in meeting biodiversity targets, except for Critically Endangered Ecosystems or Critical Linkages. CBAs in the Province can be divided into two sub-categories:	
	<ul> <li>Irreplaceable (parts of the site are within this sub-category), and</li> <li>Optimal (northern parts of the site are within this sub-category).</li> </ul>	
	Supplementary baseline terrestrial ecology studies will be undertaken during the EIA phase to inform the assessment of impacts and will include flora surveys of the project footprint to determine the presence of flora species of concern (SoC), and bird surveys of the area to define the potential risks to bird SoC.	
	The Conservation of Agricultural Resources Act (No. 43 of 1983) (CARA) Regulations with regards to alien and invasive species have been superseded by the National Environmental Management: Biodiversity Act, 2004 (Act no. 10 of 2004) – Alien and Invasive Species (AIS) Regulations which became law on 1 October 2014. Specific management measures for the control of alien and invasive plants have been included in this EMPr	
National Biodiversity Offset Guideline	The purpose of this guideline is to indicate when biodiversity offsets are likely to be required as mitigation by any competent authority (CA), to lay down basic principles for biodiversity offsetting and to guide offset practice in the environmental authorisation (EA) application context.	
Section 24j Of The National Environmental Management Act) (First Edition (October 2021)	This guideline is therefore applicable to applications for EA in terms of section 24 of NEMA. However, it can also be used to inform other administrative processes that may involve biodiversity offsetting, including applications for EA in terms of section 24G of NEMA, emergency directives contemplated in section 30A of NEMA, applications for licences under the National Water Act, 1998, the National Forests Act, 1998 and the National Environmental Management: Waste Act, 2008, applications for development rights in terms of the Spatial Planning and Land Use Management Act, 2013 and	

Legislation	Description of Legislation and applicability	
'	requests for the de-proclamation, or the withdrawal of declarations, of protected areas in terms of provincial legislation or NEMPAA.	
	Biodiversity is fundamental to the health and well-being of people, as well as economic activity and socio-economic upliftment. The National Biodiversity Assessment (2018) (NBA 2018) states that South Africa's biodiversity assets and ecological infrastructure contribute significantly towards meeting national development priorities.	
	Biodiversity offsetting, if done correctly, can advance the environmental right in the Constitution of the Republic of South Africa, 1996 (Constitution). Section 24 of the Constitution provides that everyone has the right to, amongst other things, have the environment protected for the benefit of present and future generations through reasonable legislative and other measures that, amongst other things, promote conservation and secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development. Biodiversity offsetting is one of the ways in which South Africa's protected and conservation areas can be expanded, thereby promoting conservation. It may well also help to secure ecologically sustainable development on biodiversity, which, in turn, underpins such development.	
	The biodiversity offsetting process, which only applies when a biodiversity offset is required involves the following steps:	
	<ul> <li>Identifying the need for a biodiversity offset.</li> <li>Determining the requirements of a biodiversity offset and compilation of a Biodiversity Offset Report.</li> <li>Selecting a biodiversity offset site.</li> <li>Securing the biodiversity offset site.</li> <li>Preparing a Biodiversity Offset Management Plan.</li> <li>Preparing biodiversity offset conditions for an EA.</li> <li>Concluding a Biodiversity Offset Implementation Agreement.</li> </ul>	
	A biodiversity offset strategy has been compiled and is included in <b>Appendix J of the EIAr</b> . The biodiversity offset strategy is included as a result of the very high sensitivities confirmed in terms of avifauna, the presence of primary grasslands and PES A/B wetlands on site, the potential residual impacts as well as recommendations received from the DFFE.	
National Environmental Management Protected Areas Act (No. 57 of 2003)	The purpose of the National Environmental Management Protected Areas Act (No. 57 of 2003) (NEMPAA) is to, inter alia, provide for the protection and conservation of ecologically viable areas representative of South Africa's biological diversity and its natural landscapes and seascapes. To this end, it provides for the declaration and management of various types of protected areas.	
	Section 50(5) of NEMPAA states that "no development, construction or farming may be permitted in a nature reserve or world heritage site without the prior written approval of the management authority." There are no protected areas within the study area.	
	According to the National Protected Area Expansion Strategy (NPAES), the study area forms part of the Mpumalanga PAES 20 year plan which corresponds to the NPAES (2018) map.	
The National Water Act (No. 36 Of 1998)	The National Water Act, 1998 (Act No. 36 of 1998) (NWA) provides the framework to protect water resources against over exploitation and to ensure that there is water for social and economic development, human needs and to meet the needs of the aquatic environment.	
	The Act defines water source to include watercourses, surface water, estuary or aquifer. A watercourse is defined in the Act as a river or spring, a natural channel in which water	

Legislation	Description of Legislation and applicability	
I	flows regularly or intermittently, a wetland, lake or dam into which or from which water flows, and any collection of water that the Minister may declare a watercourse.	
	Section 21 of the Act outlines a number of categories that require a water user to apply for a Water Use License (WUL) and Section 22 requires water users to apply for a General Authorisation (GA) with the Department of Water and Sanitation (DWS) if they are under certain thresholds or meet certain criteria. The list of water uses applicable to the proposed Project include:	
	<ul> <li>Taking water from a water resource;</li> <li>Impeding or diverting the flow of water in a watercourse;</li> <li>Disposing of waste in a manner which may detrimentally impact on a water resource; and</li> <li>Altering the bed, banks, course or characteristics of a watercourse.</li> </ul>	
	The DWS will make the final decision on water uses that are applicable to the project through a pre-application meeting after which a Water Use Authorisation Application (WUA) as determined by the risk assessment will be undertaken in compliance with procedural regulations published by the DWS within General Notice 267 (GN267). These regulations specify required information per water use and the reporting structure of required supporting technical information.	
The National Heritage Resources Act (No. 25 Of 1999)	The National Heritage Resource Act (Act No. 25 of 1999) (NHRA) serves to protect national and provincial heritage resources across South Africa. The NHRA provides for the protection of all archaeological and palaeontological sites, the conservation and care of cemeteries and graves by the South African Heritage Resources Agency (SAHRA), and lists activities that require any person who intends to undertake to notify the responsible heritage resources agency and furnish details regarding the location, nature, and extent of the proposed development.	
	Part 2 of the NHRA details specific activities that require a Heritage Impact Assessment (HIA) that will need to be approved by SAHRA. Parts of Section 35, 36 and 38 apply to the proposed project, principally:	
	<ul> <li>Section 35 (4) - No person may, without a permit issued by the responsible heritage resources authority-</li> </ul>	
	<ul> <li>destroy, damage, excavate, alter, deface or otherwise disturb any archaeological or palaeontological site or any meteorite;</li> </ul>	
	<ul> <li>destroy, damage, excavate, remove from its original position, collect or own any archaeological or palaeontological material or object or any meteorite.</li> </ul>	
	Section 38 (1) Subject to the provisions of subsections (7), (8) and (9), any person who intends to undertake a development categorised as-	
	<ul> <li>any development or other activity which will change the character of a site— (i) exceeding 5 000 m<sup>2</sup> in extent, must at the very earliest stages of initiating such a development, notify the responsible heritage resources authority and furnish it with details regarding the location, nature and extent of the proposed development.</li> </ul>	
	In terms of Section 38(8), approval from the heritage authority is not required if an evaluation of the impact of such development on heritage resources is required in terms of any other legislation (such as NEMA), provided that the consenting authority ensures that the evaluation of impacts fulfils the requirements of the relevant heritage resources authority in terms of Section 38(3) and any comments and recommendations of the relevant resources authority with regard to such development have been taken into account prior to the granting of the consent. However, should heritage resources of significance be affected by the proposed Project, a permit is required to be obtained prior	

Legislation	Description of Legislation and applicability
	to disturbing or destroying such resources as per the requirements of Section 48 of the NHRA, and the SAHRA Permit Regulations (GN R668).
	A Heritage impact assessment report ( <b>Appendix 6 of the EIAr</b> ) has been carried out by a suitably qualified specialist, revealing:
	<ul> <li>No Stone Age or Iron Age archaeological sites are known from the immediate area although several sites are known from the wider geographical area.</li> <li>Several burial sites are on record for the general area.</li> <li>The study area is of low to moderate and high paleontological sensitivity and according to the South African Heritage Resources Information System (SAHRIS) palaeontological sensitivity map has been subjected to a palaeontological assessment in the impact assessment phase (Appendix H-7 of the ElAr).</li> </ul>
	The proposed project will be loaded onto the SAHRIS portal for comment by the provincial Heritage Resource Agency.
Mineral and Petroleum Resources	The aim of the Mineral and Petroleum Resources Development Act (No. 28 of 2002) (MPRDA) is to make provision for equitable access to and sustainable development of the nation's mineral and petroleum resources.
Development Act (No. 28 of 2002)	Section 53(1) of the MPRDA provides that any person who intends to use the surface of any land in any way that may be contrary to any object of the MPRDA, or which is likely to impede any such object, must apply to the Minister of Mineral Resources (the Minister) for approval. Section 53 of the MPRDA provides a mechanism for ensuring that, inter alia, the mining of mineral resources is not detrimentally affected through the use of the surface of land and which may, for example, result in the sterilisation of a mineral resource.
	A Section 53 approval will be required due to the fact that the project is located on various mining right areas.
	The Amendment Regulations (GNR 420 of 27 March 2020) introduced a template for section 53 applications (Form Z) and the specific information that applicants will need to provide as part of a section 53 application.
Noise Control Regulations in terms of the Environmental Conservation, 1989 (Act 73 of 1989)	In South Africa, environmental noise control has been in place for three decades, beginning in the 1980s with codes of practice issued by the South African National Standards (formerly the South African Bureau of Standards, SABS) to address noise pollution in various sectors of the country. Under the previous generation of environmental legislation, specifically the Environmental Conservation Act 73 of 1989 (ECA), provisions were made to control noise from a National level in the form of the Noise Control Regulations (GNR 154 of January 1992). In later years, the ECA was replaced by the National Environmental Management Act 107 of 1998 (NEMA) as amended. The National Environmental Management: Air Quality Act 39 of 2004 (NEMAQA) was published in line with NEMA and contains noise control provisions under Section 34:
	(1) The minister may prescribe essential national standards –
	(a) for the control of noise, either in general or by specific machinery or activities or in specified places or areas; or
	(b) for determining –
	(i) a definition of noise; and
	(ii) the maximum levels of noise.
	(2) When controlling noise, the provincial and local spheres of government are bound by any prescribed national standards.

Legislation	Description of Legislation and applicability	
	Under NEMAQA, the Noise Control Regulations were updated and are to be applied to all provinces in South Africa. The Noise Control Regulations give all the responsibilities of enforcement to the Local Provincial Authority, where location specific by-laws can be created and applied to the locations with approval of Provincial Government. Where province-specific regulations have not been promulgated, acoustic impact assessments must follow the Noise Control Regulations.	
	Furthermore, NEMAQA prescribes that the Minister must publish maximum allowable noise levels for different districts and national noise standards. These have not yet been accomplished and as a result all monitoring and assessments are done in accordance with the South African National Standards (SANS) 10103:2008 and 10328:2008.	
Conservation of Agricultural Resources Act	The Conservation of Agricultural Resources Act (Act 43 of 1983) (CARA) provides for the implementation of control measures for soil conservation works as well as alien and invasive plant species in and outside of urban areas.	
(No. 43 of 1983)	In terms of the amendments to the regulations under the CARA, landowners are legally responsible for the control of alien species on their properties. Various Acts administered by the DFFE and the DWS, as well as other laws (including local by-laws), spell out the fines, terms of imprisonment and other penalties for contravening the law. Although no fines have yet been placed against landowners who do not remove invasive species, the authorities may clear their land of invasive alien plants and other alien species entirely at the landowners' cost and risk.	
	The CARA Regulations with regards to alien and invasive species have been superseded by NEMBA Alien and Invasive Species (AIS) Regulations which became law on 1 October 2014.	
Civil Aviation Act (No. 13 of 2009)	Civil aviation in South Africa is governed by the Civil Aviation Act (Act 13 of 2009). This Act provides for the establishment of a stand-alone authority mandated with controlling, promoting, regulating, supporting, developing, enforcing and continuously improving levels of safety and security throughout the civil aviation industry. This mandate is fulfilled by South African Civil Aviation Authority (SACAA) as an agency of the Department of Transport (DoT). SACAA achieves the objectives set out in the Act by complying with the Standards and Recommended Practices (SARPs) of the International Civil Aviation Organisation (ICAO), while considering the local context when issuing the South African Civil Aviations (SA CARs).	
	As of the 1st of May 2021, Air Traffic and Navigation Services (ATNS) has been appointed as the new Obstacle application Service Provider for Windfarms and later Solar Plants. Their responsibility would pertain to the assessments, maintenance, and all other related matters in respect to Windfarms and in due time Power Plant assessments.	
	The DFFE Screening Tool Report identified Civil Aviation as having low sensitivity for the proposed Dalmanutha WEF, and as being located between 8 and 15km of other civil aviation aerodrome.	
	An Application for the Approval of Obstacles has been submitted to ATNS. SACAA has been included on the project stakeholder database. They will be informed of the proposed Project, and comment will be sought from these authorities as applicable.	
Occupational Health and Safety Act (No. 85 of 1993)	The National Occupational Health and Safety Act (No. 85 of 1993) (OHSA) and the relevant regulations under the Act are applicable to the proposed project. This includes the Construction Regulations promulgated in 2014 under Section 43 of the Act. Adherence to South Africa's OHSA and its relevant Regulations is essential.	

Legislation	Description of Legislation and applicability	
National Energy Act (No. 34 of 2008)	The National Energy Act aims to ensure that diverse energy resources are available, i sustainable quantitates, and at affordable prices, to the South African economy is support of economic growth and poverty alleviation, taking into account environmenta management requirements and interactions amongst economic sectors.	
	The main objectives of the Act are to:	
	<ul> <li>Ensure uninterrupted supply of energy to the Republic;</li> <li>Promote diversity of supply of energy and its sources;</li> <li>Facilitate effective management of energy demand and its conservation;</li> <li>Promote energy research;</li> <li>Promote appropriate standards and specifications for the equipment, systems and processes used for producing, supplying and consuming energy;</li> <li>Ensure collection of data and information relating to energy supply, transportation and demand;</li> <li>Provide for optimal supply, transformation, transportation, storage and demand of energy that are planned, organised and implemented in accordance with a balanced consideration of security of supply, economics, consumer protection and a sustainable development;</li> <li>Provide for certain safety, health and environment matters that pertain to energy;</li> <li>Facilitate energy access for improvement of the quality of life of the people of Republic;</li> <li>Commercialise energy-related technologies;</li> <li>Ensure effective planning for energy supply, transportation, and consumption; and</li> <li>Contribute to sustainable development of South Africa's economy.</li> <li>In terms of the act, the Minister of Energy is mandated to develop and, on an annual basis, review and publish the Integrated Energy Plan (IEP) in the Government Gazette. The IEP analyses current energy consumption trends within different sectors of the</li> </ul>	
	economy (i.e. agriculture, commerce, industry, residential and transport) and uses this to project future energy requirements, based on different scenarios. The IEP and the Integrated Resource Plan are intended to be updated periodically to remain relevant. The framework is intended to create a balance between energy demand and resource availability so as to provide low-cost electricity for social and economic development, while taking into account health, safety and environmental parameters.	
Electricity	The Electricity Regulation Act (No. 4 of 2006) (ERA) aims to:	
Regulation Act (No. 4 of 2006)	<ul> <li>Achieve the efficient, effective, sustainable and orderly development and operation of electricity supply infrastructure in South Africa;</li> <li>Ensure that the interests and needs of present and future electricity customers and end users are safeguarded and met, having regard to the governance, efficiency. effectiveness and long-term sustainability of the electricity supply industry within the broader context of economic energy regulation in the Republic:</li> <li>Facilitate investment in the electricity supply industry;</li> <li>Facilitate universal access to electricity;</li> <li>Promote the use of diverse energy sources and energy efficiency;</li> <li>Promote competitiveness and customer and end user choice; and</li> <li>Facilitate a fair balance between the interests of customers and end users, licensees, investors in the electricity supply industry and the public.</li> </ul>	
	The Act establishes a National Energy Regulator as the custodian and enforcer of the National Electricity Regulatory Framework. The Act also provides for licenses and registration as the manner in which generation, transmission, distribution, trading and the import and export of electricity are regulated.	

### 4.2 CONSISTENCY WITH NATIONAL ENVIRONMENTAL MANAGEMENT ACT (NEMA) PRINCIPLES

Table 4-2 - Consistency of the Dalmanutha WEF/Dalmanutha Hybrid Energy Facility and theEIA Process with the NEMA principles

NEMA Principles	Discussion
<ul> <li>(2) Environmental management must place people and their needs at the forefront of its concern, and serve their physical, psychological, developmental, cultural and social interests equitably.</li> <li>(3) Development must be socially, environmentally and economically sustainable.</li> </ul>	Although all the specialists undertake their studies from a sustainability point of view, this principle was specifically upheld by specialists undertaking the studies within the social environment such as Biodiversity (terrestrial & aquatic), Avifaunal Impact, Air Quality, Visual Impact, Noise Impact, Socio- Economic Impact, Heritage and Archaeology,
	Financial Aspects, Land Use and Traffic and Transportation. All studies included the assessment of impacts that either directly or indirectly affect people and their living environment.
	The Dalmanutha WEF/Dalmanutha Hybrid Facility project aims to demonstrate a technology that could improve access to electricity that has a lower climate change impact than conventional power generation technologies such as coal-fired power and open cycle gas turbines.
(4) (a) Sustainable development requires the consider	ation of all relevant factors including the following:
(i) That the disturbance of ecosystems and loss of biological diversity are avoided, or, where they cannot be altogether avoided, are minimised and remedied;	All specialist studies have included recommendations and mitigation measures that encourage the minimisation or avoidance of the disturbance of ecosystems, in particular a number of sensitive wetlands, CBAs and ESAs. These mitigation measures have been included along with other more generic specifications in the EMPr.
	The Dalmanutha WEF/Dalmanutha Hybrid Facility will be required to adhere to the EMPr developed for its construction and operation.
(ii) that pollution and degradation of the environment are avoided, or, where they cannot be altogether avoided, are minimised and remedied;	All specialist studies have included recommendations and mitigation measures that encourage the minimisation or avoidance of pollution and degradation of the study area due to construction and operational activities. These mitigation measures have been included along with other more generic specification in the EMPr. The Dalmanutha WEF/Dalmanutha Hybrid Facility will be required to adhere to the EMPr developed for
	its construction and operation.
(iii) that the disturbance of landscapes and sites that constitute the nation's cultural heritage is avoided, or where it cannot be altogether avoided, is minimised and remedied;	The Heritage and Archaeological Impact Assessment investigated this principle. No Stone Age or Iron Age archaeological sites are known from the immediate area although several sites are

NEMA Principles	Discussion
	known from the wider geographical area. No Stone Age or Iron Age archaeological sites are on record within the immediate study area but this could be due to a lack of focused research in the area.
	Several burial sites are on record for the general area.
	The Dalmanutha WEF/Dalmanutha Hybrid Facility will be required to adhere to the EMPr developed for its construction and operation.
(iv) that waste is avoided or where it cannot be altogether avoided, minimised and re-used or	Mitigation measures for waste management have been included in the EMPr.
recycled where possible and otherwise disposed of in a responsible manner;	The Dalmanutha WEF/Dalmanutha Hybrid Facility will be required to adhere to the EMPr developed for its construction and operation.
(vi) that the development, use and exploitation of renewable resources and the ecosystems of which they are part do not exceed the level beyond which their integrity is jeopardised;	On 6 May 2011, the then Department of Energy (DoE) released the Integrated Resource Plan 2010- 2030 (IRP 2010) in respect of South Africa's forecast energy demand for the 20-year period from 2010 to 2030. The promulgated IRP 2010–2030 identified the preferred generation technology required to meet expected demand growth up to 2030. It incorporated government objectives such as affordable electricity, reduced greenhouse gas (GHG) emissions, reduced water consumption, diversified electricity generation sources, localisation and regional development
	The Dalmanutha WEF/Dalmanutha Hybrid Facility focuses on utilising a non-fossil based resource, and in so doing could assist in reducing stress on existing resources and the ecosystems of which they are part.
	The Dalmanutha WEF/Dalmanutha Hybrid Facility will be required to adhere to adhere to the EMPr developed for its construction and operation.
(vii) that a risk-averse and cautious approach is applied, which takes into account the limits of	Undertaking any project based on new technology could be considered risky.
current knowledge about the consequences of decisions and actions; and	It can be said that a "Cautious approach" is being followed as Enertrag SA's Business Planning Process and Methodology (through the use of the PMP and PIM) requires close scrutiny of certain aspects <i>inter alia</i> :
	<ul> <li>Financial projections</li> <li>Cost estimates</li> <li>Inflation and interest rate assumptions</li> <li>Contingency provisions</li> </ul>
	This implies continuous monitoring and updating of input data.

NEMA Principles	Discussion
	Risk is inherent in any new technology, the EIA has endeavoured to identify these risks and recommend sufficient measures that can be implemented in order to minimise the risks to acceptable levels. In terms of the specialist studies undertaken for the EIR, specialists have undertaken their studies utilising data that represents the "Worst-Case Scenario" thus also up holding a cautious approach to their studies.
(viii) that negative impacts on the environment and on people's environmental rights be anticipated and prevented, and where they cannot be altogether prevented, are minimised and remedied.	The EIA process in itself is a tool that is utilised to ensure that impacts on the environment and on people's rights are anticipated. Where a specialist study identified a negative impact, mitigation measures have been proposed in order to either prevent or minimise the impact. These mitigation measures have been included along with other more generic specifications in the EMPr. The Dalmanutha WEF/Dalmanutha Hybrid Facility will be required to adhere to the EMPr developed for its construction and operation
(4) (b) Environmental management must be integrated, acknowledging that all elements of the environment are linked and interrelated, and it must take into account the effects of decisions on all aspects of the environment and all people in the environment by pursuing the selection of the best practicable environmental option.	The EIA and all specialist studies have been undertaken taking best practise principles into consideration. The integration of the studies was ensured by specialist interaction during the study period and the integration of their findings. The construction, operation and decommissioning of the Dalmanutha WEF/Dalmanutha Hybrid Facility project will be undertaken in recognition of the need for a holistic approach to environmental management.
(4) (c) Environmental justice must be pursued so that adverse environmental impacts shall not be distributed in such a manner as to unfairly discriminate against any person, particularly vulnerable and disadvantaged persons.	All studies were required to uphold the principle of sustainable development. The project Alternative 2 was developed as a result of trying to achieve sustainable development, to reduce impacts associated with wind turbines to Avifauna on the site.
(4) (d) Equitable access to environmental resources, benefits and services to meet basic human needs and ensure human well-being must be pursued and special measures may be taken to ensure access thereto by categories of persons disadvantaged by unfair discrimination.	All studies were required to uphold the principle of sustainable development. The project in totality will benefit the community both regionally and locally. The project will give greater certainty in terms of the ability to provide present and future needs for electricity to all sectors of the populations including those that may have been disadvantaged by unfair discrimination. Locally communities may benefit from aspects such as job creation particularly within the construction phase.
(4) (e) Responsibility for the environmental health and safety consequences of a policy, programme,	The EIA addressed impacts throughout the life cycle of the development from construction to

NEMA Principles	Discussion
project, product, process, service or activity exists throughout its life cycle.	decommissioning. All specialists studies were also required to uphold the principle of sustainable development.
	The EMPr and the auditing processes as required by the Environmental Authorisation (still to be issued) will ensure that these responsibilities are up held throughout the projects' life cycle.
(4) (f) The participation of all interested and affected parties in environmental governance must be promoted, and all people must have the opportunity to develop the understanding, skills and capacity necessary for achieving equitable and effective participation, and participation by vulnerable and disadvantaged persons must be ensured.	A comprehensive Public Participation Process has been undertaken. I&APs have been given the opportunity to comment on the EIA. Public input will continue through to the construction, operational and decommissioning stages of the project through the provisions that have been made in the EMPr to appoint a community liaison officer, whose duties must include communication regarding environmental issues.
(4) (g) Decisions must take into account the interests, needs and values of all interested and affected parties, and this includes recognizing all forms of knowledge. Including traditional and ordinary knowledge.	The comments and queries from I&APs have all been either taken into account or responded to within the studies undertaken. Communication will continue through to the construction, operational and decommissioning stages of the project through the provisions that have been made in the EMPr to appoint a community liaison officer.
(4) (h) Community wellbeing and empowerment must be promoted through environmental education, the raising of environmental awareness, the sharing of knowledge and experience and other appropriate means.	The EMPr has upheld this recommendation. All contractors and operators involved in the Dalmanutha WEF/Dalmanutha Hybrid Facility will be required to adhere to the EMPr developed for its construction and operation.
(4) (i) The social, economic and environmental impacts of activities, including disadvantages and benefits, must be considered, assessed and evaluated, and decisions must be appropriate in the light of such consideration and assessment.	The EIA assesses the advantages and disadvantages of the project. The Dalmanutha WEF/Dalmanutha Hybrid Facility Business Planning Process and Methodology (through the use of the PMP and PIM) also requires close scrutiny of certain aspects <i>inter alia</i> :
	<ul> <li>Financial projections;</li> <li>Cost estimates;</li> <li>Inflation and interest rate assumptions; and</li> <li>Contingency provisions.</li> </ul>
	This implies continuous monitoring and updating of input data throughout the project's lifecycle.
	The social and environmental impacts of the project have similarly been identified, studied assessed and mitigation measures proposed.
(4) (j) The right of workers to refuse work that is harmful to human health or the environment and to be informed of dangers must be respected and protected.	This is upheld in this EMPr where the required Occupational Health and Safety specifications are dealt with. The Dalmanutha WEF/Dalmanutha Hybrid Facility will be required to adhere to this EMPr developed for its construction and operation.

NEMA Principles	Discussion
(4) (k) Decisions must be taken in an open and transparent manner, and access to information must be provided in accordance with the law.	All documentation compiled as a result of the EIA process has been made available for public comment and scrutiny, as per legal requirements and best practice.
	Communication will continue through to the construction and operational stages of the project through the provisions that have been made in this EMPr to appoint a community liaison officer.
(4) (I) There must be intergovernmental co- ordination and harmonisation of policies, legislation and actions relating to the environment.	The EIA process makes allowance for discussion between different authorities at local, provincial and national levels. Intergovernmental coordination on this project includes co-operation between the DFFE, MDARDLEA, MTPA and BirdLifeSA; resulting in the development of the Dalmanutha Hybrid facility alternative.
(4) (m) Actual or potential conflicts of interest between organs of state should be resolved through conflict resolution procedures.	The Public Participation Process endeavoured to ensure that conflict between organs of state was minimised throughout the project duration. Focus Group meetings will be held with a number of government departs such as the Department of Public Enterprises, the Department of Minerals and Energy and the ministry of Health
(4) (n) Global and international responsibilities relating to the environment must be discharged in the national interest.	All specialist studies have endeavoured to up hold this principle.
(4) (o) The environment is held in public trust for the people, the beneficial use of environmental resources must serve the public interest and the environment must be protected as the people's common heritage.	The Dalmanutha WEF/Dalmanutha Hybrid Facility is a project that will endeavour to demonstrate a new technology that strives to achieve the objectives of improved renewalble energy safety, improved proliferation resistance, minimized waste and natural resource utilisation and decreased cost to build and run such plants. The long term objectives for Dalmanutha WEF/Dalmanutha Hybrid Facility is to provide a new generation technology that can be included into the generation mix of the country which will improve electricity provision. The provision of electricity is seen to be in the public interest.
	All specialist studies have endeavoured to up hold this principle.
	The Dalmanutha WEF/Dalmanutha Hybrid Facility will be constructed, operated and decommissioned according to the Environmental Management Policies and Systems that apply to it.
(4) (p) The costs of remedying pollution, environmental degradation and consequent adverse health effects and of preventing, controlling or minimizing further pollution, environmental damage	This principle is upheld in the EIA as it will be the responsibility of Dalmanutha WEF/Dalmanutha Hybrid Facility operator Company to ensure that pollution control and rehabilitation are undertaken. In addition to this, the relevant contractors appointed

NEMA Principles	Discussion
or adverse health effects must be paid for by those responsible for harming the environment.	will be responsible for the development of method statements to ensure the minimisation of all impacts and will be responsible for their own areas of disturbance.
(4) (q) The vital role of women and youth in environment management and development must be recognised and their full participation therein must be promoted.	The Public Participation Process has endeavoured to include the participation of all role-players including women and youth in this project. Communication with the public (Including women and the youth) will continue through to the construction, operational and decommissioning stages of the project through the provisions that have been made in the EMP to appoint a community liaison officer. Employment equity will also be an important part of the Dalmanutha WEF/Dalmanutha Hybrid Facility project moving forward in terms of providing work to local communities and to Previously Disadvantaged Individuals (including women).
(4) (r) Sensitive, vulnerable, highly dynamic or stressed ecosystems, such as coastal shores, estuaries, wetlands and similar systems require specific attention in management and planning procedures, especially where they are subject to significant human resource usage and development pressure.	This principle has been upheld in this EIA. The design of the layout of infrastructure on the Dalmanutha WEF/Dalmanutha Hybrid Facility site has required extensive liaison with specialists regarding issues such as buffer zones and the various mitigation measures that may be required. In particular the site layout has been revised after buffer zones were recommended by the wetland, flora and avifaunal specialists in order to protect a sensitive areas to the north of the site. The Dalmanutha WEF/Dalmanutha Hybrid Facility will be required to adhere to this EMPr developed for its construction and operation.

### 4.3 GENERIC EMPR RELEVANT TO AN APPLICATION FOR SUBSTATION AND OVERHEAD ELECTRICITY TRANSMISSION AND DISTRIBUTION INFRASTRUCTURE

NEMA requires that an EMPr be submitted where a BAR has been identified as the environmental instrument to be utilised as the basis for a decision on an application for environmental authorisation. The content of an EMPr must either contain the information set out in Appendix 4 of the EIA Regulations, 2014, as amended, or must be a generic EMPr relevant to an application as identified and gazetted by the Minister in a government notice. Once the Minister has identified, through a government notice, that a generic EMPr is relevant to an application for EA, that generic EMPr must be applied by all parties involved in the EA process, including, but not limited to, the applicant and the CA.

GN 435 of 22 March 2019 identified a generic EMPr relevant to applications for substations and overhead electricity transmission and distribution infrastructure which require authorisation in terms

of Section 42(2) of NEMA. Applications for overhead electricity transmission and distribution infrastructure that trigger Activity 11 of Listing Notice 1 or Activity 9 of Listing Notice 2 and any other listed or specified activities must use the generic EMPr.

The objective of the generic EMPr is to prescribe and pre-approve generally accepted impact management outcomes and impact management actions, which can commonly and repeatedly be used for the avoidance, management and mitigation of impacts and risks associated with the development or expansion of overhead electricity transmission and distribution infrastructure and the development or expansion of substation infrastructure for the transmission and distribution of electricity. The use of a generic EMPr is intended to reduce the need to prepare and review individual EMPrs for applications of a similar nature.

Both the generic EMPr for substations as well as the generic EMPr for transmission lines have been used as a basis for this EMPr. The Generic EMPr for the Development and Expansion of Substation Infrastructure for the Transmission and Distribution of Electricity is attached as **Appendix D** and the Generic EMPr for the Development and Expansion for Overhead Electricity Transmission and Distribution Infrastructure is attached as **Appendix E**.

### 5 MANAGEMENT PROCEDURES AND ADMINISTRATIVE REQUIREMENTS

### 5.1 ORGANISATIONAL STRUCTURE AND RESPONSIBILITIES

Formal responsibilities are necessary to ensure that key management measures/procedures are executed. Dalmanutha Wind (Pty) Ltd (the Project Company) (via the appointed Engineering, Procurement, and Construction (EPC) contractor/contractor/principal contractor), will be responsible for the overall control of the project site during the pre-construction, construction, operation, decommissioning and rehabilitation phases of the project. The Project Company's responsibilities (via the appointed EPC contractor/contractor/principal contractor) will include the following:

- Appointing an independent environmental control officer (ECO) for the duration of the =construction phase and as specified by the DFFE;
- Being fully familiar with the EIA, EA conditions and the EMPr;
- Applying for an amendment of the EA from the DFFE as and when required in line with the prevailing legislation
- The overall implementation of the EMPr;
- Ensuring compliance, by all parties, and the imposition of penalties for noncompliance;
- Implementing corrective and preventive actions, where required;
- Ensuring that any other necessary permits or licences are obtained and complied with;
- Preventing pollution and actions that will harm or may cause harm to the environment;
- Notifying the DFFE within 30 days that construction activity will commence;
- Notifying the DFFE in writing within 24 hours if any condition in the EA cannot be or is not adhered to; and
- Notifying the DFFE 14 days prior to commencement of the operational phase.

Table 5-1 provides a high-level outline of the various roles and responsibilities of the project

Designation	Roles and Responsibilities
DFFE	<ul> <li>Is the designated authority responsible for authorising this EMPr and has overall responsibility for ensuring that the Project Company complies with this EMPr, and any conditions listed in the Environmental Authorisation.</li> <li>Shall also be responsible for approving any significant amendments that may be required to the EMPr.</li> <li>May further perform random site inspections to check compliance with the EMPr.</li> </ul>
Project Manager/Engineer/Site Engineer	<ul> <li>Ensure that the Project Company and the relevant contractor/s are aware of all specifications, and legal constraints pertaining to the project during construction, specifically with regards to the environment.</li> <li>Ensure that all stipulations within the EMPr and conditions of the environmental authorisation are communicated and adhered to by the Project Company and its contractor(s).</li> <li>Monitor the implementation of the EMPr and conditions of the environmental authorisation throughout the project by means of site</li> </ul>

Table	5-1 –	Roles	and	Respor	nsibilities
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Designation	Roles and Responsibilities			
	<ul> <li>inspections and meetings. This will be documented as part of the site meeting minutes.</li> <li>Be fully conversant with the EIA for the project, the conditions of environmental authorisation and all relevant environmental legislation.</li> </ul>			
Site Manager (EPC Contractor)	<ul> <li>Be fully conversant with the EIA, the conditions of the environmental authorisation and the EMPr.</li> <li>Approve method statements.</li> <li>Provide support to the ECO.</li> <li>Be fully conversant with all relevant environmental legislation and ensure compliance thereof.</li> <li>Have overall responsibility for the implementation of the EMPr and conditions of the environmental authorisation.</li> <li>Ensure that audits are conducted to ensure compliance to the EMPr and conditions of the environmental authorisation.</li> <li>Liaise with the Project Manager or his delegate, the ECO and others on matters concerning the environment.</li> <li>Prevent actions that will harm or may cause harm to the environment, and take steps to prevent pollution and unnecessary degradation onsite.</li> <li>Confine construction activities to demarcated areas.</li> </ul>			
Environmental Officer (EO) (EPC Contractor)	The EO must be appointed by the Contractor and is responsible for managing the day-to-day onsite implementation of the EMPr, and for the compilation of weekly environmental monitoring reports during construction. During the operational phase environmental monitoring reports as specified by the DFFE (such as annually) by the external EO. In addition, the EO must act as liaison and advisor on all environmental and related issues, seek advice from the ECO when necessary, and ensure that any complaints received from I&APs are duly processed and addressed and that conflicts are resolved in an acceptable manner and timely manner. The EO shall be a full time dedicated member of the Contractor's team and must be approved by the Project Company.			
	<ul> <li>The following qualifications, qualities and experience are recommended for the individual appointed as the EO:</li> <li>A relevant environmental diploma or degree in natural sciences, as well as a minimum of three years' experience in construction site monitoring, excluding health and safety;</li> <li>A level-headed and firm person with above-average communication and negotiating skills. The ability to handle and address conflict management situations will be an advantage; and</li> <li>Relevant experience in environmental site management and EMPr compliance monitoring.</li> <li>The EO's responsibilities include, but not limited to:</li> <li>Monitoring, on a daily basis, environmental specifications on site and compliance with the conditions of the EA, environmental legislation and EMPr;</li> <li>Keeping a register of compliance / non-compliance with the environmental</li> </ul>			
	<ul> <li>specifications;</li> <li>Identifying and assessing previously unforeseen, actual or potential impacts on the environment;</li> <li>Ensuring that a brief weekly environmental monitoring report is submitted to the ECO;</li> </ul>			

Roles and Responsibilities
<ul> <li>Conducting site inspections during the defects liability period, and bringing any environmental concerns to the attention of the ECO and Contractor;</li> <li>Advising the Contractor on the rectification of any pollution, contamination or damage to the construction site, rights of way and adjacent land;</li> <li>Attending site meetings (scheduled and ad hoc);</li> <li>Presenting the environmental awareness training course to all staff, Contractors and Sub contractors, and monitoring the environmental awareness training for all new personnel on-site, as undertaken by the Contractor;</li> <li>Ensuring that a copy of the EA and the latest version of the EMPr are available on site at all times, and maintaining a records-keeping system of all compliance and environmental documentation;</li> <li>Ensuring that the Contractor is made aware of all applicable changes to the EMPr that are approved by the DFFE;</li> <li>Assisting the Contractor in drafting environmental method statements and/or the Environmental Policy where such knowledge/expertise is lacking;</li> <li>Undertaking daily environmental monitoring to ensure the Contractor's activities do not impact upon the receiving environment. Such monitoring shall include dust, noise and water monitoring; and</li> <li>Maintaining the following on site:         <ul> <li>A weekly site diary.</li> <li>A non-conformance register (NCR).</li> <li>An I&amp;AP communications register, and</li> <li>A register of audits.</li> </ul> </li> </ul>
<ul> <li>Records of all communication received in relation to compliance actions.</li> </ul>
The EO will remain employed until all rehabilitation measures, as required for implementation due to construction damage, are completed and the site is handed over to the Operator.
A suitably qualified ECO must be appointed by the Project Company to monitor the project compliance with the EMPr and conditions of the environmental authorisation on a monthly basis during construction. During the operational phase environmental monitoring may be undertaken as specified by the DFFE (such as annually) by this external ECO. Proof of external ECO appointment must be maintained onsite.
Responsibilities of the ECO include:
<ul> <li>Be fully conversant with the EIA, the conditions of environmental authorisation and the EMPr;</li> <li>Be fully conversant with all relevant environmental legislation and ensure compliance thereof;</li> <li>Approve method statements;</li> <li>Remain employed until the completion of the construction activities; and</li> <li>Report to the Project Manager, including all findings identified onsite.</li> </ul>
In addition, the ECO will:
<ul> <li>Undertake independent monthly inspections of the site and surrounding areas in order to audit compliance with the EMPr and conditions of the environmental authorisation;</li> <li>Take appropriate action if the specifications contained in the EMPr and conditions of the environmental authorisation are not followed;</li> <li>Monitor and verify that environmental impacts are kept to a minimum, as far as possible; and</li> </ul>

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Designation	Roles and Responsibilities		
	<ul> <li>Ensure that activities onsite comply with all relevant environmental legislation.</li> </ul>		
Contractors, Staff and Service Providers	<ul> <li>Prepare Method Statements as per the EMPr, and ensure all activities are conducted as per the approved Method Statements.</li> <li>Regular on-site auditing to assess performance against the requirements of this EMPr.</li> <li>Completion of the appropriate training requirements as specified in the training program.</li> <li>Implementation and maintenance of environmental management controls as set out in the project's environmental management documentation.</li> </ul>		

Refer to: Table 1 (Part A, Section 3) of the Generic EMPr for the development and expansion of substation infrastructure for the transmission and distribution of electricity, attached as Appendix D and Table 1 (Part A, Section 3) of the Generic EMPr for the development of overhead transmission and distribution infrastructure, attached as Appendix E.

### 5.2 ENVIRONMENTAL AWARENESS PLAN

Legislation requires that Dalmanutha Wind (Pty) Ltd (via the appointed EPC contractor/contractor/principal contractor) must develop an environmental awareness plan that describes the manner in which Dalmanutha Wind (Pty) Ltd intends to inform employees of any environmental risks which may result from their work and the manner in which the risks must be dealt with in order to avoid pollution or the degradation of the environment. In recognition of the need to protect our environment, environmental management should not only be seen as a legal obligation but also as a moral obligation.

It is important to ensure that all relevant personnel have the appropriate level of environmental awareness and competence to ensure continued environmental due diligence and ongoing minimisation of environmental degradation and harm.

To achieve effective environmental management, it is important that employees, contractors (including subcontractors) are aware of the responsibilities in terms of the relevant environmental legislation and the contents of the EMPr, conditions of the environmental authorisation.

Dalmanutha Wind (Pty) Ltd will provide appropriate resources to facilitate social and environmental awareness training during the construction, operational and decommissioning phases of the project. Dalmanutha Wind (Pty) Ltd will require that all managers associated with the project adhere to the mitigation/management measures detailed in the EMPr and identify, evaluate, and minimise risks to the social, physical and biophysical environments. This will be implemented by educating employees in social and environmental matters and responsibilities relating to performance of their assigned tasks. Furthermore, employees will be entrusted to maintain the necessary level of environmental performance for their activities. Contractors, and their associated sub-contractors, will also need to demonstrate compliance to mitigation/ management measures included in the EMPr.

The following methodology described must be used to implement and ensure environmental and social awareness and competence:

#### 5.2.1 INTERNAL COMMUNICATION

Internal Communication of environmental issues to ensure environmental awareness will be achieved by using any combination of the following means:

- Meetings;
- Memos;
- Notice boards;
- Briefs;
- Reports;
- Monthly themes;
- Daily operational bulletins;
- Newsletter;
- E-mail;
- Telephone; and
- Induction training.

#### 5.2.2 STANDARD MEETINGS

The following standard meetings will be held at specific times to ensure that environmental and social awareness; potential problems; complaints etc. are heard and addressed proactively:

- Safety, Health and Environmental Meetings will be held monthly by the Senior Management;
- Safety, Health and Environmental Meetings will be held weekly (during construction) and monthly (during operation) by the relevant personnel, environmental and social issues will form part of the agenda;
- Communication between all personnel and Senior Management will be facilitated through the appropriate reporting lines, or by using complaint and incident forms.

#### 5.2.3 ENVIRONMENTAL AND SOCIAL TALK TOPICS

Monthly environmental and social talk topics must be compiled and distributed/shared to relevant personnel and must be displayed on appropriate notice boards or shared by whatever means established on site. As a minimum, the following topics must be considered during the course of the construction phase:

- Water Quality;
- Water Use and Consumption;
- Air Quality i.e. dust;
- Power Consumption and Energy Efficiency;
- Waste Management;
- Fauna and Flora;
- Emergency Procedures;
- Incidents Reporting;
- Systems;
- Noise;
- Heritage Impacts;
- Landowner Etiquette;
- Speed Limits;
- Health Risks (such as HIV/ Aids); and

General Awareness (e.g. World Environment Day, National Arbour Day).

#### 5.2.4 GENERAL COMMUNICATIONS

Communication to the community, government, landowners, neighbouring farmers, environmental groups, non-government organisations and other stakeholders will be communicated to ensure environmental and social awareness by means of the following:

- Fax or E-mail;
- Telephone; or
- Formal meetings.

#### 5.2.5 TRAINING

It is important to ensure that all personnel, contractors and their sub-contractors have the appropriate level of environmental awareness and competence to ensure continued environmental due diligence and on-going minimisation of environmental harm. As a minimum environmental training must include the following:

- Employees must have a basic understanding of the key environmental features of the site and the surrounding environment.
- Employees will be thoroughly familiar with the requirements of the EMPr and the environmental specifications as they apply to the project.
- Employees must undergo training for the operation and maintenance activities associated with project and have a basic knowledge of the potential environmental impacts that could occur and how they can be minimised and mitigated.
- Awareness of any other environmental matters, which are deemed to be necessary by the Environmental Officer.
- Training must include the environment, health and safety as well as basic HIV/AIDS education.

The following facets to training form part of this Environmental and Social Awareness Plan:

- Induction: Environmental and social awareness training will be given at induction when personnel join the company and/or return from leave. Induction training will also be given to visitors entering the site. Induction training will include, inter alia:
  - A discussion on the environment concept, what does it comprise of and how do we interact with it;
  - A description on the components and phases of the specific renewable power generation facility;
  - A general account of how the facility and its associated activities can affect the environment, giving rise to what are called environmental impacts;
  - A discussion on what staff can do in order to help prevent the negative environmental impacts from degrading the environment i.e. environmental impact management.
- Job Specific Training: Job specific training programmes will be developed as and when required. The programs will be based on the significant environmental and social aspects/ impacts that are identified during regular audits and site inspections. Supervisory staff will be equipped with the necessary knowledge and information to guide their employees on environmental and social aspects applicable to performing a specific task.

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- Competency Training: The Environmental Officer will be responsible for the environmental and social competency and awareness training of Middle Management and supervisors. This training will be performed both on a one-on-one basis and through workshops and presentations. Competence and the effectiveness of training and development initiatives will be determined through the following methods:
  - Trend analysis of incidents reported; and
  - Analysis of work areas during visits and audits.

The process to declare competency of personnel is documented in the ISO9001:2000 procedure. This plan will be amended periodically in light of operational changes, learning experienced during its implementation and other activities that can affect the risk profiles.

Training Records: Training can be done either in a written or verbal format but will be in an appropriate format for the receiving audience. Persons having received training must indicate in writing that they have indeed attended a training session and have been notified in detail of the contents and requirements of the EMPr. The attendance registers must be kept on file.

To ensure accountable and demonstrated implementation of the EMPr, a number of reporting systems, documentation controls and compliance mechanisms must be in place. **Table 5-2** indicates the minimum requirements as set out in the generic EMPrs for the development of overhead transmission and distribution infrastructure and for the development and expansion of substation infrastructure for the transmission and distribution of electricity.

Table 5-2 - Documentation Reporting and Compliance Requirements as per the generic	;
EMPrs	

Aspect	Refer to Generic EMPr (Part A)
Document control/Filing system	Section 4.1
Documentation to be available	Section 4.2
Weekly Environmental Checklist	Section 4.3
Environmental site meetings	Section 4.4
Required Method Statements	Section 4.5
Environmental Incident Log (Diary)	Section 4.6
Non-compliance	Section 4.7
Corrective action records	Section 4.8
Photographic record	Section 4.9
Complaints register	Section 4.10
Claims for damages	Section 4.11
Interactions with affected parties	Section 4.12

Environmental audits	Section 4.13
Final environmental audits	Section 4.14

Refer to: Part A, Section 4 of the Generic EMPr for the development and expansion of substation infrastructure for the transmission and distribution of electricity, attached as Appendix D and for the Development and Expansion for Overhead Electricity Transmission and Distribution Infrastructure attached as Appendix E.

#### 5.3 MONITORING

The EPC contractor EO will monitor the day-to-day site activities on an ongoing basis and will produce weekly monitoring reports during construction. The independent, external ECO will undertake monthly audits to ensure compliance with the EMPr and conditions of the environmental authorisation during the construction activities and will report to the Site Manager should any non-compliance be identified or corrective action deemed necessary.

During the operational phase, Dalmanutha Wind (Pty) Ltd (via the appointed EPC contractor/contractor/principal contractor) will establish, implement and maintain a procedure to monitor and measure, on a regular basis, the key characteristics of the operations that may have a significant environmental impact. The procedure shall include the documenting of information to monitor performance, applicable operational controls and conformity with the operation's environmental objectives and targets.

Dalmanutha Wind (Pty) Ltd will ensure that all instruments and devices used for the measurement or monitoring are calibrated and appropriately operated and maintained. Calibration records must be kept on site or in close proximity to the equipment for ease of availability.

All the conditions outlined in the EMPr (**Section 6**) will be subject to required internal day-to-day monitoring and external compliance monitoring. Where required, any specific additional monitoring has been outlined in the EMPr (**Section 6**).

### 5.4 NON-CONFORMANCE AND CORRECTIVE ACTION

The auditing of the construction and operational activities may identify non-conformances to the EMPr and conditions of the EA. Non-conformances may also be identified through incidents, emergencies or complaints recorded. In order to correct non-conformances, the source must be determined, and corrective actions must be identified and implemented.

### 5.4.1 COMPLIANCE WITH THE EMPR AND CONDITIONS OF THE ENVIRONMENTAL AUTHORISATION

- A copy of the EMPr and conditions of the environmental authorisation will be available onsite at all times for the duration of the construction and operational activities;
- All persons employed by a contractor or their sub-contractors will abide by the requirements of the EMPr and conditions of the environmental authorisation;
- Any members of the workforce found to be in breach of any of the specifications contained within the EMPr and conditions of the environmental authorisation may be ordered by the Site Manager to leave the site. A contractor will not direct a person to undertake any activity which would place

them in contravention of the specifications contained within the EMPr and conditions of the environmental authorisation;

- Should a contractor be in breach of any of the specifications contained in the EMPr and conditions of the environmental authorisation, the Site Manager will, in writing, instruct the contractor responsible for the incident of non-compliance regarding corrective and/or remedial action required, specify a timeframe for implementation of these actions, implement a penalty and/or indicate that work will be suspended should non-compliance continue;
- Should non-compliance continue, further written notification will be forwarded to the contractor responsible for the incident of non-compliance outlining the required corrective and/or remedial action, the timeframe for implementation, penalties and/or work will be suspended as specified previously; and
- Departmental officials will be given access to the property referred to in the EIAr and EMPr for the purpose of assessing and/or monitoring compliance with the EMPr and conditions of the environmental authorisation, at all reasonable times.

#### 5.4.2 DUTY OF CARE

Under Section 28 of the NEMA, all personnel involved with the construction and operational activities onsite will be responsible for implementing measures to prevent pollution or degradation of the environment from occurring, continuing or recurring. Failure to comply with the above conditions is a breach of the duty of care. If such harm is unavoidable, steps must be taken to minimise and rectify such pollution or degradation of the environment.

### 5.5 DOCUMENTATION AND REPORTING

The following documentation must be kept onsite in order to record compliance with the EMPr and conditions of the environmental authorisation:

- Record of complaints; and
- Record of emergencies and incidents.

The contractor will be required to report on the following:

- Environmental incidents involving contractor/ employees and/or the public;
- Environmental complaints and correspondence received from the public; and
- Incidents that cause harm or may cause harm to the environment.

The above records will form an integral part of the ECO's reports and records thereof maintained for the duration of the project. These records will be kept with the EMPr and conditions of the EA, and will be made available for scrutiny if so requested by the Site Manager or his delegate and the ECO.

The contractor will ensure that the following information is recorded for all environmental complaints/incidents/emergencies:

- Date of complaint/incident/emergency;
- Location of complaint/incident/emergency;
- Nature of complaint/incident/emergency;
- Causes of complaint/incident/emergency;
- Party/parties responsible for causing complaint/incident/emergency;
- Immediate actions undertaken to stop/reduce/contain the causes of the complaint/incident/emergency;



- Additional corrective or remedial action taken and/or to be taken to address and to prevent reoccurrence of the complaint/incident/emergency;
- Timeframes and the parties responsible for the implementation of the corrective or remedial actions;
- Procedures to be undertaken and/or penalties to be applied if corrective or remedial actions are not implemented; and
- Copies of all correspondence received regarding complaints/incidents/emergency.

### 5.6 PUBLIC COMPLAINTS

The Contractor shall keep a Complaints Register on site to allow the general public to document any comments on or complaints regarding the activities of the site.

The Complaints Register must:

- Have numbered pages any missing pages must be accounted for by the Contractor;
- Be tabled during monthly site meetings;
- Be made available to the SE/Contract Manager, the ECO, the Project Company, and/or any authority at any time if requested; and
- Include a section for the documentation of the action taken to address the complaint.

All complaints must be investigated, responded to, and recorded in the Complaints Register within 28 calendar days.

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### 6 GENERIC ENVIRONMENTAL CONTROLS

This section refers to construction related activities that are common to the development of the substation associated with the Dalmanutha Hybrid Energy Facility as defined within the preapproved generic EMPrs. For each activity, a set of prescribed environmental controls and associated management actions have been identified. Contractors shall implement these controls as a minimum requirement for mitigating the impact of particular construction related activities.

These control measures are defined within Part B: Section 1 of the pre-approved generic EMPrs (attached as **Appendix D** and **Appendix E**). The format of a general environmental control is shown below, see **Table 6-1**. The boxes shaded in green are predefined and represent minimum standards for the management of that particular aspect. The Contractor will be required to adhere to all impact management actions (where applicable to the construction related activity) for the Project. The boxes shaded in red assign responsibility for the implementation and monitoring of the impact management actions. This implementation and monitoring information is project specific and shall be completed by the Contractor prior to commencement of construction.

### Table 6-1 – Format of a general environmental control illustrating aspects which are predefined versus those which still need to be completed by the contractor

Management Objective:	Predefined as part of Generic EMPr					
Management Outcome:	Predefined as part of Generic EMPr					
Impact	Implementation		Monitoring			
Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible person	Frequency	Evidence of compliance
Predefined as part of Generic EMPr	To be completed by Contractor	To be completed by Contractor	To be completed by Contractor	To be completed by Contractor	To be completed by Contractor	To be completed by Contractor

The completed template must be signed and dated on each page by both the contractor and the holder of the EA prior to commencement of the activity. The method statements must be prepared and agreed to by the holder of the EA, prior to commencement, and must be appended to the template. Each method statement must also be duly signed and dated on each page by the contractor and the holder of the EA. This template, once signed and dated, is legally binding. The holder of the EA will remain responsible for its implementation.

The construction related activities addressed within Part B: Section 1 of the pre-approved generic EMPrs are as follows:

Activity	Refer to Generic EMPr for the development and expansion of substation infrastructure, attached as Appendix D (Part B: Section 1)	Refer to Generic EMPr for the development of overhead transmission and distribution infrastructure, attached as Appendix E (Part B: Section 1)
Environmental awareness training	5.1	5.1
Site Establishment development	5.2	5.2
Access restricted areas	5.3	5.3
Access roads	5.4	5.4
Fencing and Gate installation	5.5	5.5
Water Supply Management	5.6	5.6
Storm and wastewater management	5.7	5.7
Solid and hazardous waste management	5.8	5.8
Protection of watercourses and estuaries	5.9	5.9
Vegetation clearing	5.10	5.10
Protection of fauna	5.11	5.11
Protection of heritage resources	5.12	5.12
Safety of the public	5.13	5.13
Sanitation	5.14	5.14
Prevention of disease	5.15	5.15
Emergency procedures	5.16	5.16
Hazardous substances	5.17	5.17
Workshop, equipment maintenance and storage	5.18	5.18
Batching plants	5.19	5.19
Dust emissions	5.20	5.20

#### Table 6-2 - Activities and management measures as per generic EMPr (Part B: Section 1)

Activity	Refer to Generic EMPr for the development and expansion of substation infrastructure, attached as Appendix D (Part B: Section 1)	Refer to Generic EMPr for the development of overhead transmission and distribution infrastructure, attached as Appendix E (Part B: Section 1)
Blasting	5.21	5.21
Noise	5.22	5.22
Fire prevention	5.23	5.23
Stockpiling and stockpile areas	5.24	5.24
Finalising tower positions	Not applicable to a Solar PV facility	5.25
Civil works	5.25	5.25
Excavation (and Installation) of foundations	5.26	5.26
Installation of foundations, cable trenching and drainage systems	5.27	5.27
Assembly and erecting towers	Not applicable to a Solar PV facility	5.27
Installation of equipment (circuit breakers, current Transformers, Isolators, Insulators, surge arresters, voltage transformers, earth switches)	5.28	5.28
Stringing (and cabling)	5.30	5.28
Testing and Commissioning (all equipment testing, earthing system, system integration)	5.31	5.31
Socio-economic	5.32	5.29
Temporary closure of site	5.33	5.30
Dismantling of old equipment	5.34	5.34
Landscaping and rehabilitation	5.35	5.31

Refer to: Part B – Section 1 of the Generic EMPr for the development and expansion of substation infrastructure for the transmission and distribution of electricity, attached as Appendix D and Part B – Section 1 of the Generic EMPr for the development of overhead transmission and distribution infrastructure, attached as Appendix E.

### 7 SITE SPECIFIC ENVIRONMENTAL CONTROLS

The EMPr contains guidelines, operating procedures, rehabilitation and pollution control requirements which will be binding to the onsite personnel working for, or on behalf of Dalmanutha Hybrid Energy Facility. It is essential that the EMPr be carefully studied, understood, implemented and adhered to at all times.

In instances where the method statements provided by the contractor conflicts with the EMPr, such conflicts will be discussed between the Site Manager, ECO and contractor and if unresolved the EMPr will take precedent.

The EMPr identifies various actions which are undertaken throughout the construction and operational phases of the Dalmanutha Hybrid Energy Facility. Not every action will be required during the entire course of activities. Therefore, the actions identified in the EMPr have been given priority timeframes for proposed implementation. The columns in the structure of the EMPr have been described in **Table 7-1** below.

Column	Description
Activity/Aspect	Highlights the various activities/aspects associated with the project i.e. the contractors' activities that will interact with the environment.
Impact Management Outcome	The desired outcomes from effectively minimising negative impacts and/or enhancing positive impacts.
Impact Management Actions/Measures	Indicates the actions required to prevent and /or minimise the potential impacts on the environment that are associated with the project.
Indicator and Compliance Management	Items that will assist with determining compliance against management actions.
Responsibility	Indicates the party responsible for implementing the environmental measures and action plans laid out in the EMPr. Please note that the Site Manager will have authority to stop works if/as necessary.
Priority Timeframe	Indicates when the actions for the specific aspect must be implemented and/or monitored.

#### Table 7-1 – Structure of EMPr



#### Table 7-2 – Contractor laydown area and site access: EMPr Mitigation and Management Measures

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
CONTRACTOR LAY	OOWN AREA AND SITE ACCESS		
Impact Management Outcom	e:		
<ul> <li>To implement measures to and implementation of mitig</li> </ul>	minimise impacts on the environment from the initiation of construction activities throu ation measures.	igh planning, careful site a	access route selection
<ul> <li>Indicator and Compliance Mechanism:</li> <li>Health, safety, environmental and community incident and complaints management system register.</li> <li>Close-out on incidents.</li> <li>Monitoring and audit reports.</li> <li>Inductions training and register.</li> <li>Environmental awareness programme/toolbox talks.</li> </ul>			
Project Initiation of Construction Activities	Appoint an ECO to manage and verify compliance with the EA, EMPr and WUL/GA.	<ul><li>Project Manager</li><li>EO</li></ul>	<ul><li>Construction</li><li>Decommissioning</li></ul>
	The development footprint must be demarcated to ensure that only the demarcated areas are impacted upon. The no-go areas identified must be demarcated before the construction or decommissioning commences. This includes all wetlands and the associated buffers, and any high sensitivity areas as indicated in <b>Figure 3-1 as</b> No-Go. Label these areas as environmentally sensitive areas, keep out.	<ul> <li>Contractor (Site Manager)</li> </ul>	
	All personnel and contractors to undergo Environmental Awareness Training, including awareness of the surrounding area and wetlands to inform the importance of these areas and their conservation. A signed register of attendance must be kept for proof.		<ul><li>Construction</li><li>Operation</li></ul>



Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
	Site clearing must be limited to the footprint of the infrastructure requirements. Locate firefighting measures at laydown areas and vehicle storage areas, such as fire extinguishers, and make personnel aware of fire prevention and firefighting measures. Firefighting equipment must be securely placed and inspected monthly.	-	<ul> <li>Construction</li> </ul>



#### Table 7-3 – Vehicle, Equipment and Machinery Management: EMPr Mitigation and Management Measures

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
VEHICLE, EQUIPME	NT AND MACHINERY MANAGEMENT		
Impact Management Outcom To implement measures to	ne: minimise impacts on the environment from poorly maintained equipment, machinery a	and vehicles onsite.	
<ul> <li>Indicator and Compliance Mechanism:</li> <li>Health, safety, environmental and community incident and complaints management system register.</li> <li>Close-out on incidents.</li> <li>Monitoring and audit reports.</li> <li>Transport route delineation.</li> <li>Daily equipment, machinery and vehicle checklists.</li> <li>Incident classification and reporting procedure.</li> </ul>			
Operation of Equipment, Machinery and Vehicles	<ul> <li>Ensure that the equipment, machinery and vehicles are adequately maintained so as to:</li> <li>Reduce the potential for spillages of oil, diesel, fuel or hydraulic fluid.</li> <li>Ensure road-worthiness.</li> <li>Reduce emissions.</li> <li>Evidence of such maintenance must be recorded and maintained onsite for verification.</li> <li>The movement of vehicles into and out of the site must be managed to ensure the impact on public areas is minimised, such as ensuring that abnormal loads are moved outside of peak traffic hours, and reasonable measures are taken to ensure that public and staff safety is managed adequately</li> <li>All vehicles must be regularly inspected for leaks;</li> </ul>	<ul> <li>EO</li> <li>Contractor</li> <li>Operator</li> </ul>	<ul> <li>Construction</li> <li>Operation</li> <li>Decommissioning</li> </ul>



Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
	Re-fuelling must take place on a sealed surface area away from the watercourses to prevent ingress of hydrocarbons into topsoil;		



#### Table 7-4 – Fuel and Chemical Management: EMPr Mitigation and Management Measures

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
FUEL AND CHEMICA	AL MANAGEMENT		
Impact Management Outcom To ensure the correct storage	<b>le:</b> ge, handling and disposal of fuels and chemicals in order to prevent impacts to the su	rrounding environment.	
<ul> <li>Indicator and Compliance Mechanism:</li> <li>Maintenance records.</li> <li>Safe disposal certificates (if applicable)</li> <li>Material safety data sheets (MSDS).</li> <li>Emergency preparedness and response procedure.</li> <li>Incident classification and reporting management procedure (to be developed).</li> <li>Health, safety, environmental and community incident and complaints management system register.</li> <li>Chemicals management procedure (to be developed).</li> <li>Monitoring and audit reports.</li> <li>Training records.</li> </ul>			
Fuel and Chemical Management	Provide secure storage for fuel, oil, chemicals and other hazardous materials. Securely fence and lock the storage areas to accommodate all hazardous substances such as fuel, oils and chemicals. The storage area must be roofed and the floor must be an impermeable surface and suitably bunded as per the requirements outlined in SANS 10089-1 (2008). If storage capacity triggers licencing, those must be acquired.	<ul><li>EO</li><li>Contractor</li><li>Operator</li></ul>	<ul><li>Construction</li><li>Operation</li></ul>
	Label all liquids (chemicals and hydrocarbons) stored onsite for easy identification. MSDS for onsite chemicals, hydrocarbon materials and hazardous substances must be readily available. MSDS must include mitigation measures to ameliorate potential environmental impacts which may result from a spill, incorporating health and safety mitigation measures.		

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
	A spill management plan must be in place to ensure that should there be any chemical spill out or over that it does not run into the surrounding areas. Drip trays or any form of oil absorbent material must be placed underneath vehicles/machinery and equipment when not in use.		
	No servicing of equipment on site unless necessary. All contaminated soil / yard stone shall be treated in situ or removed and be placed in containers for safe disposal.		
	In cases where a surface leak occurs during loading and off-loading activities, the spill material will be cleaned using a spill kit.		
	Storage of potentially hazardous materials (including but not limited to fuel, oil, cement, etc.) must be above any 100-year flood line or outside the designated watercourse buffer, whichever is greater;		
	A walled concrete platform, dedicated store with adequate flooring or bermed area must be used to accommodate chemicals such as fuel, oil, paint, herbicide and insecticides, as appropriate, in well-ventilated areas;		
	All spills should be immediately cleaned up and treated accordingly; and		
	Appropriate sanitary facilities must be provided for the duration of the construction activities and all waste must be removed to an appropriate waste facility.		
	No mixing of construction materials such as cement should be permitted within or adjacent to watercourses and no such mixing may occur on bare soils in the surrounding areas;		
	Leaking equipment and vehicles must be repaired immediately or be removed from the project area to facilitate repair		



Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
Health and Safety	Display "no smoking" and "no naked flame" signs in and around the project area, as well as near the hazardous material store. Strategically place the correct types of fire extinguishers onsite and near the hazardous material store. Train key personnel on basic firefighting skills	<ul><li>EO</li><li>Contractor</li></ul>	<ul><li>Construction</li><li>Operation</li></ul>


### Table 7-5 – Waste Management: EMPr Mitigation and Management Measures

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
WASTE MANAGEME	INT		
Impact Management Outcom	le:		
<ul> <li>To ensure the correct handling, storage, transportation and disposal of general waste and hazardous waste.</li> <li>Indicator and Compliance Mechanism: <ul> <li>Induction training and records.</li> <li>Waste Management Plan (WMP).</li> <li>Relevant SANS Codes of Practice.</li> <li>Waste manifests and safety disposal certificates (all waste streams).</li> <li>Emergency preparedness and response procedure.</li> <li>Incident classification and reporting management procedure (to be developed).</li> <li>Health, safety, environmental and community incident and complaints management system register.</li> </ul> </li> </ul>			
General Waste Management	General waste generated as a result of construction and operational activities must be managed in accordance with a WMP (to be developed).Train and inform all onsite personnel regarding general waste minimisation, management and disposal as per the WMP.Prohibit littering, burning and burying of waste onsite.Place an adequate number of labelled or colour coded general waste bins around the laydown area and at the construction sites during construction activities in order to minimise littering. The bins must be removed from the site on a regular basis for disposal at a registered or licensed disposal facility.	<ul> <li>EO</li> <li>Contractor</li> </ul>	<ul> <li>Construction</li> <li>Operation</li> <li>Decommissioning</li> </ul>

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
	Waste management must be a priority and all waste must be collected and stored adequately. It is recommended that all waste be removed from site on a weekly basis to prevent rodents and pests entering the site.		
	Refuse bins shall be emptied daily (or as required) and secured.		
	Temporary storage of domestic waste shall be in covered waste skips.		
	Maximum domestic waste storage period shall be 10 days.		
	Retain records such as waybills and waste manifests associated with waste removal, transportation and disposal (safe disposal certificates).		
	Prohibit the mixing of general waste with hazardous waste. Should general waste be mixed with hazardous waste, it will be considered hazardous waste.		
	There should be waste segregation (e.g. electronic equipment, chemicals, oil contaminated rags, paper, plastic) and management on the site.		
	Recover, recycle and reuse waste of general waste as far as possible.		
Hazardous Waste Management	Hazardous waste generated as a result of construction, operational and decommissioning activities must be managed in accordance with a WMP.	ECO EO	<ul><li>Construction</li><li>Operation</li><li>Decommissioning</li></ul>
	The WMP must include a procedure for handling spillages.	Contractor	
	Strict use and management of all hazardous materials used on site.		
	Strict management of potential sources of pollution (e.g. litter, hydrocarbons from vehicles & machinery, cement during construction, etc.) within demarcated / bunded areas		

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
	Train and inform all onsite personnel regarding hazardous waste minimisation, management and disposal as per the WMP.		
	A designated and appropriately demarcated and covered hazardous waste storage area must be established on a hard standing area.	_	
	Ensure that all hazardous wastes temporarily stored on site are stored in a covered skip and are placed on a hard standing area.	_	
	Clean areas where hazardous waste spills have occurred and dispose of the hazardous material appropriately. Key personnel must be trained on handling spillages.		
	Retain records of appropriate safety disposal certificates associated with hazardous waste removal, transportation and disposal.		
	An emergency preparedness and response plan is to be developed by the contractor/operator for any hazardous waste being removed, transported and disposed of offsite.		
	Ensure that waste manifest documentation (as per the Waste Classification and Management Regulations – GNR 634) is prepared and maintained for the generation, transportation and disposal of waste.		
	All major spills should be reported to the authorities as per the emergency preparedness and response frequencies / specifications.		



### Table 7-6 – Health and Safety: EMPr Mitigation and Management Measures

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
HEALTH AND SAFE	TY		
<ul> <li>Impact Management Outcome:</li> <li>To ensure communication with members of the public to promote safety awareness.</li> <li>To prevent public access to construction sites and storage areas.</li> <li>To ensure safety for all onsite personnel.</li> </ul>			
<ul> <li>Indicator and Compliance Mechanism:</li> <li>Induction training and records.</li> <li>Health, safety, environmental and community incident and complaints management system register.</li> <li>Monitoring and audit reports.</li> <li>Incident classification and reporting management procedure (to be developed).</li> <li>PPE Register.</li> <li>Occupational health and safety plan (to be developed).</li> <li>Health and safety protocol (to be developed).</li> </ul>			
Health and Safety	The construction phase will be managed according to all the requirements of the Occupational Health and Safety Act 85 of 1993 specifically the Construction Regulations. All onsite personnel are required to undergo induction training and regular toolbox talks in order to raise awareness of the conditions contained herein.	<ul><li>Site Manager</li><li>Contractor</li><li>EO</li></ul>	<ul><li>Construction</li><li>Operation</li></ul>
	Development and implementation of an occupational health and safety plan and Safety Health Environment Risk & Quality (SHERQ) policy	<ul><li>Contractor/Operator</li><li>Site Manager</li></ul>	<ul><li>Construction</li><li>Operation</li></ul>

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
	The appointed contractor will be responsible for the development of a comprehensive health and safety protocol which must be adhered to. Emergency response plan to be in place prior to beginning construction and to	<ul> <li>Contractor</li> </ul>	<ul> <li>Construction</li> </ul>
	include aspects such as appointment of emergency controller, provision of first aid, and first responder contact numbers.		
	Provide and wear appropriate PPE onsite.	<ul><li>Contractor/Operator</li><li>Site Manager</li></ul>	<ul><li>Construction</li><li>Operation</li></ul>
	All normal procedures for working at heights, hot work permits, confined space entry, cordon off excavations etc to be in place before construction begins	<ul><li>Contractor/Operator</li><li>Site Manager</li></ul>	<ul><li>Construction</li><li>Operation</li></ul>
	All necessary good hygiene practices to be in place, e.g. provision of toilets, eating areas, infectious disease controls.	<ul><li>Site Manager</li><li>Contractor</li><li>EO</li></ul>	<ul><li>Construction</li><li>Operation</li></ul>
	Policies and practice for dealing with known vectors of disease such as Aids, TB, COVID 19 and others.		
	Prior to construction, determine the dangerous species in the area and what responses are needed to bites/exposure/attacks.		
	Train all onsite personnel handling chemical or hazardous substances in the use of such substances and the environmental, health and safety consequences of incidents.	<ul><li>Site Manager</li><li>Contractor</li><li>EO</li></ul>	<ul><li>Construction</li><li>Operation</li></ul>
	Outside work must be stopped during thunderstorms.	<ul> <li>Site Manager</li> <li>Contractor</li> </ul>	<ul><li>Construction</li><li>Operation</li></ul>
	Lightning conductors may be required for the final installation, to be confirmed during design phase.	EO	
Facility emergencies	Emergency response plan for full operation and maintenance phase to be in place prior to beginning commissioning and to include aspects such as:	<ul> <li>Operator</li> </ul>	<ul> <li>Operation</li> </ul>

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
	<ul> <li>appointment of emergency controller,</li> <li>emergency isolation systems for electricity,</li> <li>emergency isolation and containment systems for electrolyte,</li> <li>provision of PPE for hazardous materials response,</li> <li>provision of emergency facilities for staff at the main office building,</li> <li>provision of first aid facilities,</li> <li>first responder contact numbers etc</li> </ul>		
	A detailed risk assessment of all normal operating and maintenance activities on site to be compiled, and form the basis of operating instructions, prior to commencing commissioning.	<ul> <li>Operator</li> </ul>	<ul> <li>Operation</li> </ul>
	Material Safety Data Sheets (MSDSs) must be made available for all chemicals and substances on site	<ul><li>Site Manager</li><li>Contractor</li><li>Operator</li><li>EO</li></ul>	<ul><li>Construction</li><li>Operation</li></ul>
Fire risk	Full Process Safety Management system with all elements to be implemented to highest international best practice levels.	<ul> <li>Site Manager</li> <li>Contractor</li> <li>Operator</li> <li>EO</li> </ul>	<ul><li>Construction</li><li>Operation</li></ul>
	Suitable fire-fighting equipment on site near source of fuel, e.g. diesel tank, generators, mess, workshops etc		
	Safety integrity level rating of equipment (failure probably) with suitable redundancy if required.		
	Ensure regular testing of emergency alarm systems are undertaken.		
	Emergency Response plan in compliance with SANS 1514 to be compiled, e.g. plan from transport and construction phase to be extended to operational phase to include the hazards of the systems containing large quantities of highly hazardous chemicals.		



Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
Public Safety	Restrict public access by employing full time security for the site.	<ul><li>Site Manager</li><li>EO</li></ul>	<ul><li>Construction</li><li>Operation</li></ul>
BESS	Except during shipping, ideally the units should not be stored any closer to each other than they would be in the final installation so that propagation is prevented, i.e. laydown area needs to be considered.	<ul><li>Site Manager</li><li>Contractor</li><li>EO</li></ul>	<ul> <li>Construction</li> </ul>
	Handling protocols to be provided by battery supplier.		
	End of Life plan needs to be in place before any battery containers enter the country as there may be damaged battery units from day one.	Operator	<ul> <li>Operation</li> </ul>
	Operating manuals to be provided including start-up, shut-down, steady state, monitoring requirements.		
	Maintenance manuals with make safe, decontamination and repair procedures.	-	
	Proposed maintenance schedules daily, weekly, monthly, annual etc.	-	
	Provided portable equipment for calibration and for testing/verification of defective equipment.		
	There needs to be careful thought given to procedures to be adopted before entering into the BESS or a container under normal circumstances (confined space) but particularly after a BMS shut down where there may be flammable or toxic gases present, a fire etc.		
Decommissioning of facility	End of Life shutdown procedure including a risk assessment of the specific activities involved.	<ul><li>Operator</li><li>EO</li></ul>	<ul> <li>Decommissioning</li> </ul>
	Re-purpose the equipment with associated environmental impact considered.		
	Disposal according to local regulations and other international directives.		



Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
	Operator should seek the opinion from a waste consultant on how to correctly dispose of hazardous waste.		



### Table 7-7 – Water Management: EMPr Mitigation and Management Measures

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
WATER MANAGEME	NT		
<ul> <li>Impact Management Outcom</li> <li>To implement measures to</li> <li>To prevent erosion.</li> </ul>	e: prevent the contamination of surface and groundwater resources.		
<ul> <li>Indicator and Compliance Ma</li> <li>Induction training and recor</li> <li>WMP (to be developed).</li> <li>Water Use Licence (or Gen</li> <li>Incident classification and re</li> <li>Environmental awareness p</li> <li>SWMP (to be developed).</li> </ul>	echanism: ds. eral Authorisation as applicable). eporting management procedure (to be developed). programme/toolbox talks.		
Surface Water Management	Investigate feasibility of construction activities being conducted during the dry season if practical and feasible to avoid possible wetland contamination from storm water runoff (as well as soil erosion) that may be experienced during wet seasons, as much as possible. A stormwater management plan must be developed in the preconstruction phase, detailing the stormwater structures and management interventions that must be installed to manage the increase of surface water flows directly into any natural systems The stormwater control systems must be inspected on an annual basis to ensure these are functional. Effective stormwater management must include effective stabilisation (gabions and Reno mattresses) of exposed soil and the re-vegetation of any disturbed riverbanks.	<ul> <li>Site Manager</li> <li>EO</li> </ul>	Pre-Construction

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
	Install properly sized culverts with erosion protection measures at the present road / track crossings where already installed by local landowners / public works entities.		
	To appropriately manage storm water, the SWMP needs to be implemented.	Site Manager	<ul><li>Pre- construction</li><li>Construction</li></ul>
	It is recommended that a comprehensive rehabilitation / monitoring plan be implemented from the project onset i.e. during the detailed design phase prior to construction, to ensure a net benefit to the environment within all areas that will remain undisturbed.	<ul> <li>Contractor</li> <li>EO</li> </ul>	<ul> <li>Operation</li> </ul>
	The site must be prepared/managed/contoured as according to the SWMP (to be developed) to allow for surface water to readily drain away and to prevent ponding of water anywhere within the site.	<ul><li>Site Manager</li><li>Contractor</li><li>EO</li></ul>	<ul> <li>Construction</li> </ul>
	No runoff may be discharged or directed into the wetlands.		
	Containment of all contaminated water by means of careful run-off management on site.		
	Ensure that site offices, ablutions, contractor laydown areas, construction materials and stockpiles, where relevant, are placed outside and above the 1:100 year flood line;		
	Limit the footprint area of the construction activities to what is absolutely essential in order to minimise impacts as a result of vegetation clearing and compaction of soils;		
	As far as possible, site clearing activities should take place at the end of the wet season to minimise the risk of erosion, incision and sedimentation of the associated watercourses, and as far as possible, all remaining construction activities should take place during the dry winter months to minimise impacts as a result of high flows and runoff from exposed soils and materials;		

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
	Ensure a soil management programme is implemented and maintained to minimise the potential for erosion and sedimentation;		
	All/any topsoil or building material stockpiles must be protected from erosion, stored on flat areas where runoff will be minimised, and be surrounded by bunds. Stockpiles must also only be stored for the minimum amount of time necessary;		
	Erosion berms or suitable water attenuation measures should be installed on roadways and downstream of construction and infrastructure areas to prevent gully formation and siltation of the associated watercourses.		
	Active rehabilitation, re-sloping, and re-vegetation of disturbed areas immediately after construction must take place;		
	All erosion noted within the construction footprint should be remedied immediately and included as part of an ongoing rehabilitation plan;		
	Implement and maintain an alien vegetation management programme;		
	No unnecessary crossing of the watercourses should take place;		
	Only authorised personnel should be allowed within the construction area;		
	Watercourses should be designated as "No-Go" areas and be off limits to all unauthorised vehicles and personnel; except were there area only authorised water crossing required.		
	No material may be dumped or stockpiled within or adjacent to the watercourses;		
	Working protocols incorporating pollution control measures (including approved method statements by the contractor) should be clearly set out for the project and strictly enforced.		



Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
Groundwater Management	Areas with the potential to contaminate the groundwater must be underlain by hardstanding of suitable integrity.	<ul><li>Site Manager</li><li>Contractor</li><li>EO</li></ul>	<ul> <li>Construction</li> </ul>
	Acquire spill kits to clean up any hydrocarbon or chemical spills during construction, operation and closure to prevent seepage. All spillage incidents must be reported to the responsible site officer as soon as they occur.		<ul><li>Construction</li><li>Operation</li></ul>
	Oils, greases, diesel and other chemicals will be stored in the prescribed manner and within bunded areas to prevent groundwater contamination.		<ul> <li>Construction</li> </ul>
	Any cement mixing shall be completed on impervious hardstanding surfaces to prevent spillage to the environment		
Potable Water Management	Onsite staff are to be provided with an appropriate potable water supply, safe and healthy sanitary facilities and protection against exposure to environmentally dangerous or unhealthy situations or conditions.	<ul> <li>Contractor/Operator</li> <li>EO</li> </ul>	<ul><li>Construction</li><li>Operation</li></ul>
	Appropriate ablution facilities should be provided for construction workers during construction and on-site staff during the operation of the facility. These must be situated outside of any delineated watercourses and wetlands.		
	Onsite staff must be made aware and encouraged to use water sparingly such that there is no water wastage.		



### Table 7-8 – Air quality: EMPr Mitigation and Management Measures

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
AIR QUALITY			
<ul><li>Impact Management Outcom</li><li>To ensure that impacts to a</li></ul>	e: ir quality of the surrounding environment are minimised.		
<ul> <li>Indicator and Compliance Me</li> <li>Complaints register.</li> <li>Incident reporting system.</li> <li>Health, safety, environment</li> <li>Incident classification and re</li> <li>Equipment, machinery and</li> </ul>	echanism: al and community incident and complaints management system register. eporting management procedure (to be developed). vehicle maintenance.		
Dust Management	Before the commencement of any site works and during the operation, as much vegetation as possible must be retained, including patches and strips to minimise dust.	<ul><li>EO</li><li>Contractor</li></ul>	<ul><li>Construction</li><li>Operation</li></ul>
	Activities with high dust-causing potential, such as grading and moving of soil, must not be carried out in sensitive areas during adverse wind conditions.	-	Construction
	All stockpiles (if any) must be restricted to designated areas and may not exceed a height of two (2) metres;		
	Earth-moving works have the potential to generate large amounts of dust. Pre- planning of earth-moving works can reduce dust emissions by limiting the time the site is exposed. Options for dust control can include the following:		
	<ul> <li>Plan earth-moving works so that they are completed just prior to the time they are needed</li> </ul>		

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
	<ul> <li>Observe weather conditions and do not commence or continue earth moving works if conditions are unsuitable e.g., under conditions of strong winds</li> <li>Reduce off-site hauling via balanced cut and fill operations</li> <li>Pre-water areas to be disturbed</li> </ul>		
	Cover and/or maintain appropriate freeboard on trucks hauling any loose material that could produce dust when travelling. Minimise transfer points.		
	Re-vegetate disturbed areas as soon as possible to prevent excessive dust from occurring.		
	Once construction is complete, initiate rehabilitation (e.g. re-vegetation) procedures to reduce wind speed across exposed surfaces.		
	Dampen exposed soil to suppress dust if required. Use watering sprays on materials to be loaded and during loading.		
	Where possible, minimise speed limits, vehicle weights and the number of vehicles using unpaved roads.		



### Table 7-9 – Noise: EMPr Mitigation and Management Measures

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe			
NOISE						
Impact Management Outcom To ensure that noise impact	Impact Management Outcome: <ul> <li>To ensure that noise impacts to the surrounding environment are minimal or mitigated.</li> </ul>					
<ul> <li>Indicator and Compliance Mechanism:</li> <li>Complaints register.</li> <li>Incident reporting system.</li> <li>Health, safety, environmental and community incident and complaints management system register.</li> <li>Incident classification and reporting management procedure (to be developed).</li> <li>Equipment, machinery and vehicle maintenance.</li> </ul>						
Noise	The developer should aim to Select turbines with lower noise level specifications.	<ul> <li>Developer</li> </ul>	<ul> <li>Pre-construction /planning</li> </ul>			
	Fit equipment, machinery and vehicles generating excessive noise with appropriate noise abatement measures and undergo regular maintenance to ensure optimum efficiency during operation Provide a complaints register to report any excessive noise incidents. Manage all	<ul><li>EO</li><li>Contractor/Operator</li></ul>	<ul><li>Construction</li><li>Operation</li></ul>			
	complaints as per the Incident Classification and Reporting Management Procedure. Contact details of a responsible person on site should complaints arise.					
	Regular maintenance of equipment to reduce the generation of additional unwanted noise					

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
	Avoid noisy activities at night-time and outside of normal weekend working hours where possible.		
	Due to the rural nature of site, construction is unlikely to continue after sunset, however if required to work afterhours, notices should be put up informing the neighbouring/relevant landowners/land occupiers accordingly.		
	Employees / contractors are to be provided with appropriate hearing protection when undertaking noisy activities.	<ul><li>EO</li><li>Contractor/Operator</li></ul>	<ul><li>Construction</li><li>Operation</li></ul>
	Employees to be provided with hearing protection if working near equipment that exceeds the noise limits.	<ul><li>EO</li><li>Contractor/Operator</li></ul>	<ul><li>Construction</li><li>Operation</li></ul>
	Planning construction activities in consultation with land owners/land occupiers so that activities with the greatest potential to generate noise are planned during periods of the day that will result in least disturbance. Information regarding construction activities should be provided to identified and nearby receptors likely to be affected. Such information includes:	<ul><li>EO</li><li>Contractor</li></ul>	<ul><li>Construction</li></ul>
	<ul> <li>Proposed working times.</li> <li>Anticipated duration of activities.</li> <li>Explanations on activities to take place and reasons for activities.</li> <li>Contact details of a responsible person on site should complaints arise.</li> <li>When working near a potential sensitive receptor, limit the number of simultaneous activities to a minimum as far as possible.</li> <li>Using noise control devices, such as temporary noise barriers and deflectors for high impact activities, and exhaust muffling devices for combustion engines.</li> <li>Selecting equipment with the lowest possible sound power levels whilst still being suitable for the specific task.</li> <li>Ensuring equipment is well-maintained to avoid additional noise generation.</li> </ul>		
	Operate turbines in reduced noise mode should any complaints be received.	• EO	<ul> <li>Operation</li> </ul>



Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
	Build walls/appropriate noise barriers around potentially affected buildings.	<ul> <li>Operator</li> </ul>	
	Limit turbine operations above the wind speed at which turbine noise becomes unacceptable in the project-specific circumstances.		



### Table 7-10 – Soil, Land Use and Agriculture: EMPr Mitigation and Management Measures

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
SOIL, LAND USE AN	DAGRICULUTURE		
Impact Management Outcom	ne:		
<ul> <li>To prevent any disturbance</li> </ul>	, erosion or contamination of soil resources.		
<ul> <li>Indicator and Compliance Ma</li> <li>Induction training and recording with two seconds of the developed).</li> <li>Incident classification and results of the developed of the developed.</li> <li>Incident classification and results of the developed of the developed.</li> <li>Incident classification and results of the developed of the developed.</li> <li>Incident classification and results of the developed of the developed.</li> <li>Incident classification and results of the developed of the developed.</li> <li>Incident classification and results of the developed of the developed.</li> <li>Incident classification and results of the developed of the developed.</li> <li>Incident classification and results of the developed of the developed.</li> <li>Incident classification and results of the developed of the developed.</li> <li>Incident classification and results of the developed of the developed.</li> <li>Incident classification and results of the developed of the developed.</li> <li>Incident classification and results of the developed of the developed of the developed.</li> <li>Incident classification and results of the developed of the d</li></ul>	echanism: ds. eporting management procedure (to be developed). al and community incident and complaints management system register. s. lan (SWMP) (to be developed).		
Loss of soil	Strip and stockpile all useable soil material.	<ul><li>EO</li><li>Contractor</li></ul>	<ul> <li>Construction</li> </ul>
	Topsoil stockpiles should be kept low (below 2m tall).		
	Irrespective of where soil is stockpiled, it should be vegetated as soon as possible to protect against erosion, discourage weeds and maintain active soil microbes.		
	The Shortlands and Clovelly topsoils should be stripped to a depth of 30 cm and subsoils to a depth of 80cm. All stripping and stockpiling should be undertaken according to the guidelines below.		
	Demarcate the area to be stripped clearly, so that the contractor does not strip beyond the demarcated boundary.		
	The stripped soil should be relocated by truck along set removal paths.		

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
	The area to be stripped requires storm water management and the in-flow of water should be prevented with suitable structures.		
	Prepare the haul routes prior to stripping.		
	Stripping should not be undertaken in wet conditions.		
	Construction activities should be planned in such a way that they work around farming schedules.		
	Final siting of the turbines should avoid dividing fields into sections that are too small to be agriculturally viable and should take into account any aerial crop spraying activities that might be undertaken.		
	Turbines should be sited out of cultivated areas where possible.		
	Limiting vehicle routes on site by demarcating traffic areas.		
	Limiting site vehicle access.		
	Reuse of existing roads will prevent additional areas from becoming compacted.		
	Stripping soils when they are dry.		
	Compacted soils can be ripped to make them more suitable for cultivation.		
	Limit earthworks and vehicle movement to demarcated paths and areas.		
	Limit the duration of construction activities, especially those involving earthworks / excavations.		
	Access roads associated with the development should have gradients or surface treatment to limit erosion, and road drainage systems should be accounted for.		



Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
	Existing roads should be used and regraded instead of creating new roads wherever possible.		
	Removal of vegetation must be avoided until such time as soil stripping is required and similarly exposed surfaces and soil stockpiles should be re-vegetated or stabilised as soon as is practically possible.		
	A construction phase-specific storm water management plan should be designed for the site and adhered-to.		
	During periods of strong winds, stockpiles that have not yet been vegetated should be covered with appropriate material.		



### Table 7-11 – Terrestrial Biodiversity: EMPr Mitigation and Management Measures

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe		
TERRESTRIAL BIOD	TERRESTRIAL BIODIVERSITY				
<ul> <li>Impact Management Outcom</li> <li>Prevent the unnecessary de</li> <li>No excess habitat loss with</li> <li>Revegetation of cleared are</li> <li>Alien vegetation clearing &amp;</li> <li>Reduce erosion.</li> </ul>	ne: estruction of, and fragmentation of the biodiversity of the area. in sensitive areas. eas. control.				
<ul> <li>Indicator and Compliance Me</li> <li>Induction training and record</li> <li>Incident classification and r</li> <li>Environmental awareness p</li> <li>Monitoring and audit report</li> </ul>	echanism: rds. eporting management procedure (to be developed). programme/toolbox talks. s.				
Loss and Disturbance of terrestrial biodiversity Habitat	Vegetation clearing should be restricted to the proposed Project footprints only, with no clearing permitted outside of these areas; The footprints to be cleared should be clearly demarcated prior to construction to prevent unnecessary clearing outside of these areas;	<ul><li>Site Manager</li><li>Contractor</li><li>EO</li></ul>	Construction		
	No heavy vehicles should travel beyond the marked works zone. A rehabilitation/landscaping protocol should be developed and implemented on- site. The protocol should include, inter alia, the following provisions: Stockpiling of topsoil from development footprints during site preparation;				



Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
	Post-construction, the land form should be correctly contoured to limit potential erosion and compacted soils should be ripped and loosened to facilitate vegetation establishment;		
	Topsoil removed during construction should be applied to all non-operational sites that were disturbed during construction and require revegetation; and		
	Locally occurring indigenous grasses species should be used to revegetate all areas disturbed during construction.		
	Monitoring of rehabilitated and revegetated sites should be conducted annually until such as time as rehabilitation of disturbed sites has proved successful;		
	Key aspects that should be monitored include:		
	Successful establishment and coverage of vegetation;		
	Sites of erosion;		
Biodiversity Offset	The Biodiversity Offset Strategy must be revisited and an implementation plan compiled once the final layout and EMPr are approved.	<ul><li>Project Manager</li><li>Site Manager</li><li>Contractor</li><li>EO</li></ul>	<ul><li>Construction</li><li>Operation</li></ul>



### Table 7-12 – Aquatic Biodiversity: EMPr Mitigation and Management Measures

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
AQUATIC BIODIVER	SITY		
<ul> <li>Impact Management Outcom</li> <li>Prevent the unnecessary do</li> <li>Prevent contamination of w</li> </ul>	<b>ne:</b> estruction of, and fragmentation of the aquatic biodiversity of the area. etlands		
Indicator and Compliance Me Induction training and record	echanism: rds.		
<ul> <li>Incident classification and r</li> <li>Environmental awareness p</li> <li>Monitoring and audit reports</li> </ul>	eporting management procedure (to be developed). programme/toolbox talks. s.		
Aquatic biodiversity	All construction roads and supporting infrastructure in or adjacent to the wetland habitat shall be minimised, and shall be aligned and managed to ensure uninterrupted flow both upstream and downstream of infrastructure which crosses the wetness zones and/or in-stream habitats.	<ul><li>Site Manager</li><li>Contractor</li><li>Developer</li><li>EO</li></ul>	<ul> <li>Construction</li> </ul>
	A construction method statement for wetland road crossings must be developed by a wetland ecologist and environmental engineer, and implemented on site during construction.		
	Where possible, construction should be done in the dry season and completed by the wet season, so that appropriate water management systems are in place for stormwater management.		
	As far as possible, use of existing access roads should be made.		

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
	Pollution prevention measures for the protection of wetlands, rivers and streams from contamination with hydrocarbons, sediments and other chemicals to be implemented.		
	No protected wetland plants to be disturbed without the necessary permits in place – plant search and rescue surveys of affected wetlands should be conducted in the wet season immediately prior to construction, in line with an agreed plant translocation plan.		
	Vegetation and soil clearing should be restricted to the immediate construction footprint only.		
	A 100 m buffer around wetlands (other than those being crossed by access roads) must be clearly demarcated and maintained throughout the duration of the construction phase to enable construction workers to avoid the wetland areas outside the construction footprint, and minimise the risk of disturbance impacts on wetland ecosystems arising from construction activities as well as the physical presence of Project infrastructure (other than road or other infrastructure crossings) in the catchments.		
	Vegetation establishment of bare soils after construction should be done using indigenous grass species found naturally in the area, which should be detailed as part of the wetland rehabilitation and management plan.		
	The re-vegetation programme shall take cognisance of the climatic and seasonal conditions but should generally be undertaken annually starting in spring and early summer.		
	Regular inspection and maintenance of the wetland crossings at access roads to ensure that subsurface drains are in working order, and no confinement or impoundment of water is establishing.		

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
	Design and planning of all proposed activities in the wetlands or adjacent to or in the vicinity of rivers, streams and wetlands shall consider the following measures:		
	Erosion control and protection measures installed as part of the construction of the project will be adapted for the specific area and situation where signs of erosion appear.		
	Soil compacted in non-operational areas during construction activities should be ripped to break up the compacted soil surface and re-vegetated to aid infiltration and decrease run-off.		
	Topsoil stockpiles to be re-vegetated with non-invasive vegetation, in order to stabilise the soil, reduce run-off and minimise erosion into		
	The efficiency of erosion control and protection measures installed as part of the construction of the project will be monitored specifically after high rainfall events.		
Spread of alien invasive plants	Develop an alien and invasive plant management program to pro-actively strive towards the eradication and control of alien invasive species within the mining right area. Alien and invasive species management in remaining wetland areas should be prioritised for the following areas:	<ul><li>EO</li><li>Operator</li></ul>	<ul><li>Construction</li><li>Operation</li></ul>
	<ul> <li>Areas where wetland vegetation cover is disturbed.</li> <li>Wetland areas where soils imported from external sources are applied.</li> <li>All rehabilitated wetland areas</li> </ul>		



### Table 7-13 – Plant Species: EMPr Mitigation and Management Measures

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
PLANT SPECIES			
<ul> <li>Impact Management Outcom</li> <li>To minimise impact to the v</li> <li>To minimise impact to plant</li> </ul>	regetation community SCC		
<ul> <li>Indicator and Compliance Ma</li> <li>Induction training and recor</li> <li>Environmental awareness p</li> <li>Monitoring and audit reports</li> </ul>	echanism: ds. programme/toolbox talks. s.		
Loss and Disturbance of Flora Habitat	Vegetation clearing should be restricted to the proposed Project footprints only, with no clearing permitted outside of these areas; The footprints to be cleared should be clearly demarcated prior to construction to prevent unnecessary clearing outside of these areas; and No heavy vehicles should travel beyond the marked works zone. A rehabilitation/landscaping protocol should be developed and implemented on- site. The protocol should include, inter alia, the following provisions: Stockpiling of topsoil from development footprints during site preparation; Post-construction, the land form should be correctly contoured to limit potential erosion and compacted soils should be ripped and loosened to facilitate vegetation establishment;	<ul> <li>Site Manager</li> <li>Contractor</li> <li>EO</li> </ul>	Construction

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
	Topsoil removed during construction should be applied to all non-operational sites that were disturbed during construction and require revegetation; and		
	Locally occurring indigenous grasses species should be used to revegetate all areas disturbed during construction.		
	Monitoring of rehabilitated and revegetated sites should be conducted annually until such as time as rehabilitation of disturbed sites has proved successful;		
	<ul> <li>Key aspects that should be monitored include:</li> <li>Successful establishment and coverage of vegetation;</li> <li>Sites of erosion;</li> <li>The findings of monitoring should be used to inform the need for additional rehabilitation and/ or corrective actions.</li> <li>To be undertaken during the wet/growing season</li> </ul>		
	To promote grassland health, local farmers should be approached in order to investigate the potential of developing a co-ordinated grassland burning (wildfire) programme for the study area;		
	To prevent wetland desiccation, the wetland management and protection measures outlined in the wetland impact assessment for the proposed Project should be strictly implemented on-site.		
Alien invasive species	An Alien Invasive Species (AIS) Control and Eradication Plan must be developed for the Project. It is recommended that the plan include:	<ul><li>Site Manager</li><li>Contractor</li><li>EQ</li></ul>	<ul><li>Construction</li><li>Operation</li></ul>
	<ul> <li>A combined approach using both chemical and mechanical control methods;</li> <li>Periodic follow-up treatments, informed by regular monitoring;</li> <li>A specific focus on:</li> <li>All sites disturbed by construction; and</li> <li>Areas of wetland/stream vegetation.</li> </ul>		



Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
	Annual on-site alien invasive species monitoring should be conducted. Monitoring should focus on:		
	All sites disturbed during the construction phase;		
	Riparian/wetland areas adjacent to construction sites;		
	Monitoring should assess species type and density, and these data should inform the scope of ongoing alien invasive species control.		
	To be undertaken during the wet/growing season		



### Table 7-14 – Animal Species: EMPr Mitigation and Management Measures

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
ANIMAL SPECIES			
Impact Management Outcom	ie:		
Prevent the loss of the faun	al community		
<ul> <li>Indicator and Compliance Ma</li> <li>Induction training and recording</li> <li>Incident classification and recordination</li> <li>Environmental awareness pairs</li> <li>Adhere to sensitivity map can be addressed and the sensed and the sensed and the sensitivity map can be a</li></ul>	echanism: ds. eporting management procedure (to be developed). programme/toolbox talks. riteria s.		
Loss and Disturbance of Fauna Habitat	A low-speed limit (recommended 20-40 km/h) should be enforced on site to reduce wildlife collisions;	<ul><li>Contractor</li><li>EO</li></ul>	<ul> <li>Construction</li> </ul>
	Vegetation clearing should be restricted to the proposed Project footprints only, with no clearing permitted outside of these areas;		
	The footprints to be cleared should be clearly demarcated prior to construction to prevent unnecessary clearing outside of these areas;		
	No heavy vehicles should travel beyond the marked works zone.		
	A rehabilitation/landscaping protocol should be developed and implemented on- site. The protocol should include, inter alia, the following provisions:		
	Stockpiling of topsoil from development footprints during site preparation;		
	Post-construction, the land form should be correctly contoured to limit potential erosion and compacted soils should be ripped and loosened to facilitate vegetation establishment;		



Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
	Topsoil removed during construction should be applied to all non-operational sites that were disturbed during construction and require revegetation; and		
	Locally occurring indigenous grasses species should be used to revegetate all areas disturbed during construction.		
	Monitoring of rehabilitated and revegetated sites should be conducted annually until such as time as rehabilitation of disturbed sites has proved successful;		
	<ul> <li>Key aspects that should be monitored include:</li> <li>Successful establishment and coverage of vegetation;</li> <li>Sites of erosion;</li> <li>The findings of monitoring should be used to inform the need for additional rehabilitation and/ or corrective actions.</li> </ul>		
Injury, Mortality and Disturbance of Fauna	An Environmental Control Officer (ECO) should be on-site during vegetation clearing to monitor and manage any wildlife-human interactions;	<ul><li>Contractor</li><li>EO</li></ul>	<ul> <li>Construction</li> </ul>
	As appropriate, barriers should be erected around construction trenches and excavations to prevent fauna being trapped in these features;		
	Any fauna species trapped in construction areas, should be safely and correctly relocated to an adjacent area of natural habitat;		
	The handling, poisoning, and killing of on-site fauna by contractors must be strictly prohibited;		
	General noise abatement equipment should be fitted to construction machinery and vehicles;		
	Dust suppression using water bowsers should be undertaken on all roads and other sites where dust entrainment occurs;		



Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
	The rules and regulations concerning fauna should be communicated to contractors through on-site signage and awareness training; and		
	An incidence register should be maintained throughout all phases of the Project detailing any fauna mortalities/injuries caused by on-site activities. The register should be used to identify additional biodiversity management requirements.		
Loss of fauna species of conservation concern	A Mountain Reedbuck (EN) surveying programme should be conducted to determine the population size and spatial use (i.e., territorial configuration) of the study area. These data should then be used to identify additional and adaptive conservation and management interventions for Mountain Reedbuck for inclusion in the Project's Biodiversity Action Plan (BAP);	<ul> <li>Contractor</li> <li>EO</li> </ul>	<ul> <li>Construction</li> </ul>
	The on-site ECO should be trained in inter alia, the preliminary identification of fauna SCC;		
	In the event that millipedes are encountered during construction, the ECO should collect a suitable specimen and submit it to a millipede expert for identification. If it is found to be <i>Doratogonus furculifer</i> , construction activities at the relevant site should cease immediately, and the ECO should consult the millipede expert and the MPTA with respects to implementing a rescue and relocation managing programme for this species.		



### Table 7-15 – Avifauna: EMPr Mitigation and Management Measures

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
AVIFAUNA			
Impact Management Outcom To minimise impacts to avif	auna and their habitat		
Indicator and Compliance Me Induction training and recor Incident classification and re Environmental awareness p Monitoring and audit reports	echanism: ds. eporting management procedure (to be developed). programme/toolbox talks. s.		
General	<ul> <li>The sensitive (No-Go) areas identified by this study should be adhered to.</li> <li>A pre-construction avifaunal walk down should be conducted to confirm final layout and identify any sensitivities that may arise between the conclusion of the EIA process and the construction phase.</li> <li>All human activities associated with construction, operation and decommissioning should be strictly managed according to generally accepted environmental best practice standards, so as to avoid any unnecessary impact on the receiving environment.</li> <li>All staff, vehicle and machinery activities should be strictly controlled at all times so as to ensure that the absolute minimum of surface area is impacted</li> <li>The "during construction" and "post-construction" monitoring programme outlined in Appendix 10 of the Avifaunal Assessment should be implemented according to the latest available version of the Best Practice Guidelines at the time.</li> </ul>	<ul> <li>Site Manager</li> <li>Contractor</li> <li>Developer</li> <li>EO</li> </ul>	<ul> <li>Pre-Construction</li> <li>Construction</li> </ul>

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe					
Avifaunal collisions with turbines	A post-construction site inspection must be conducted by an avifaunal specialist to confirm that all aspects have been appropriately handled and in particular that road and hard stand verges do not provide additional substrate for raptor prey species. It is essential that the new wind farm does not create favourable conditions for such mammals in high risk areas. It is therefore recommend that within the first year of operations a full assessment of this aspect be made by the ornithologist contracted for post-construction monitoring. If such conditions have been created, case-specific solutions will need to be developed and implemented by the wind farm.	<ul><li>Operator</li><li>EO</li></ul>	Operator EO	<ul> <li>Operator</li> <li>EO</li> </ul>	<ul><li>Operator</li><li>EO</li></ul>	<ul> <li>Operator</li> <li>EO</li> </ul>	Operator EO	<ul> <li>Operation</li> </ul>
	It is strongly recommended that rodenticides not be used at the newly established Operation and Maintenance (O&M) buildings or around auxiliary infrastructure on the project site. While pest control of this nature may be effective, even so-called "environmentally friendly" rodenticides are toxic and pose significant secondary poisoning risk to predatory avifauna, especially owls.							
	A 'Cape Vulture Food Management Programme' must be implemented on site to ensure all dead livestock/wildlife on site are removed as soon as possible and made unavailable to vultures for feeding. This programme will reduce the amount of available vulture food on site and reduce vulture-turbine collision risk. This programme will require the deployment of a dedicated (i.e. no other tasks) and adequately resourced (transport, binoculars, GPS, cameras, training) team of staff to patrol the full site and immediate surrounds during all daylight hours. The co- operation of landowners will also be essential to ensure that reported carcasses are disposed of effectively. This programme must be operational by the time the first turbine blades are turning on site and should not wait for Commercial Operations Date (COD). A full detailed method statement for this programme must be designed by an ornithologist prior to COD, and included in the EMPr.							
	The landowner agreements should ensure specifically that any vulture feeding sites be stopped from the start of wind farm construction and not used for the full lifespan of the wind farm. Landowners should also be sensitised to the need to cooperate with the above Cape Vulture Food Management Programme.							

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
	Cape Vultures will have to be effectively deterred from roosting on overhead power lines on site. This will need to be achieved well before turbines are operational and maintained through the project lifespan.		
	Eskom Bird Guards (perch deterrents) must be installed on all pylons at the two roost sites, with full coverage of steel cross members (not just above live phases as per Eskom standard). In addition, the team of staff employed to implement the Cape Vulture Food Management Programme described above should also be tasked with patrolling the relevant sections of power line early morning and late evenings to scare any perching vultures away. This should first be trialled by in collaboration with an avifaunal specialist to ensure that such actions don't increase turbine collision risk in the short term by flushing vultures into turbines.		
	An Observer-Led Turbine Shutdown on Demand (OLSDOD) programme must be implemented on site from COD. This is required in order to mitigate the risk of turbine collision for priority bird species. This programme must consist of a suitably qualified, trained, dedicated and resourced team of observers present on site for all daylight hours 365 days of the year. This team must be stationed at vantage points with full visible coverage of all turbine locations. The observers must detect incoming priority bird species, track their flights, judge when they enter a turbine proximity threshold, and alert the control room to shut down the relevant turbine/s until the risk has reduced. A full detailed method statement must be designed by an ornithologist prior to COD, and included in the EMPr. The effectiveness of this programme is highly dependent on hiring the correct staff and managing them appropriately. The project must pay careful attention to this aspect to minimise collision risk.		
	All turbines must have one of their blades painted according to the approval to be obtained by the South African Civil Aviation Authority (SACAA) from the outset. Provision must be made by the developer for the resolution of any technical, warranty or supplier challenges that this may present.		

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
	A bird fatality threshold and adaptive management plan must be designed by an ornithologist for the site prior to the Commercial Operation Date (COD) and included in the EMPr. This plan should identify most importantly the number of bird fatalities of priority species which will trigger a management response, appropriate responses, and time lines for such responses. Fatalities of priority bird species are usually rare events (but with very high consequence) and it is difficult to analyse trends or statistics related to these fatalities as they occur. It is therefore important to have a threshold policy in place proactively to assist adaptive management.		
	Any residual impacts after all possible mitigation measures have been implemented will need to be mitigated off site. The facility will need to address other sources of mortality of priority species in a measurable way so as to compensate for residual effects on the facility itself. This will need to be detailed in a Biodiversity Action Plan.		
	The combination of turbine hub height and rotor diameter must be optimised to maximise the lower blade tip height above ground. Raising the lower turbine blade tip height from a typical 30m above ground to approximately 50m above ground will reduce collision risk for most species, as most flight is low over the ground.		
	The "during construction" and "post-construction" monitoring programme outlined in Appendix 10 of the Avifaunal impact assessment should be implemented according to the latest available version of the Best Practice Guidelines at the time. The findings from Operational Phase monitoring should inform the adaptive management programme to mitigate any impacts on avifauna to acceptable levels.		
Birds are killed through flying into & colliding with power lines, and or PV panels	No internal medium voltage power lines should be overhead. All such cables should be buried, and follow road verges at all times, unless specifically agreed to by the avifaunal specialist.	<ul><li>Operator</li><li>EO</li></ul>	<ul> <li>Operation</li> </ul>



Activity/Aspect Imp	npact Management Actions/Measures	Responsible Person	Priority Timeframe
Any ant and The orn	ny overhead conductors or earth wires should be fitted with an Eskom approved nti-bird collision line-marking device to make cables more visible to birds in flight nd reduce the likelihood of collisions. he pole design of any overhead power line should be approved by an rnithologist in terms of the electrocution risk it may pose to large birds such as		


#### Table 7-16 – Archaeological and Cultural Heritage: EMPr Mitigation and Management Measures

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
ARCHAEOLOGICAL	AND CULTURAL HERITAGE		
<ul><li>Impact Management Outcom</li><li>To ensure that sites/artefact</li></ul>	e: ts of heritage value are identified and protected.		
<ul> <li>Indicator and Compliance Me</li> <li>Health, safety, environment</li> <li>Incident classification and re</li> <li>Monitoring and audit reports</li> </ul>	echanism: al and community incident and complaints management system register. eporting management procedure (to be developed).		
Heritage & Cultural sites	If any evidence of archaeological sites or remains (e.g., remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments and charcoal/ash concentrations) is found during construction activities, the finds must be reported and the Chance Find Protocol must be implemented ( <b>Section 8.15.1</b> ). If any graves are uncovered during construction activities, the archaeologist must be called in to inspect and verify the finds to be heritage graves, mitigation may be	<ul> <li>Site Manager</li> <li>Contractor</li> <li>Operator</li> <li>EO</li> <li>Archaeologist</li> </ul>	<ul><li>Construction</li><li>Operation</li></ul>
	necessary and the SAHRA Burial Grounds and Graves (BGG) Unit must be contacted for processes to follow. Avoidance is the preferred course of action, if not possible the sites can be mitigated prior to destruction. The graves should be avoided, demarcated with access for family and 30m buffer.		



### Table 7-17 – Palaeontology: EMPr Mitigation and Management Measures

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe		
PALAEONTOLOGY					
Impact Management Outcom To ensure that palaeontolog	Impact Management Outcome:  To ensure that palaeontological material is identified and protected.				
<ul> <li>Indicator and Compliance Me</li> <li>Health, safety, environment</li> <li>Incident classification and re</li> <li>Monitoring and audit reports</li> </ul>	echanism: al and community incident and complaints management system register. eporting management procedure (to be developed).				
Chance Finds	If any palaeontological material is exposed during digging, excavating, drilling or blasting Implement the finds must be reported and the Chance Find Protocol must be implemented ( <b>Section 8.14.1</b> ).	<ul><li>Site Manager</li><li>Contractor</li><li>EO</li></ul>	<ul> <li>Construction</li> </ul>		
	Any further impact on the palaeontological heritage can be reduced greatly by the environmental officer or contractor checking the excavations for fossils, photographing and putting aside any possible fossils, and seeking the opinion of a palaeontologist as to whether the possible fossils are of any scientific value.	<ul> <li>Site Manager</li> <li>Contractor</li> <li>EO</li> <li>Palaeontologist</li> </ul>	<ul> <li>Construction</li> </ul>		
	The palaeontologist can then remove any scientifically important fossils with the relevant SAHRA permit.				
	The Fossil Chance Find Protocol in Section 8.14 must be implemented in the event of a fossil find on site				



### Table 7-18 – Traffic: EMPr Mitigation and Management Measures

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
TRAFFIC			
Impact Management Outcom	ie:		
• To ensure that the traffic im	pacts of the project are mitigated and managed.		
<ul> <li>Indicator and Compliance Me</li> <li>Induction training and recore</li> <li>Health, safety, environment</li> <li>Monitoring and audit reports</li> <li>Incident classification and reports</li> <li>PPE Register.</li> <li>Occupational health and sa</li> <li>Health and safety protocol (</li> <li>Traffic and transportation me</li> </ul>	echanism: ds. al and community incident and complaints management system register. s. eporting management procedure (to be developed). fety plan (to be developed). (to be developed). anagement plan		
Management Plan	<ul> <li>Traffic Management Plan (TMP) is to be compiled once the contractor has been appointed and all the relevant details of the construction process are known. The TMP needs to address, inter alia:</li> <li>clearly defined route/s to the site for specific vehicles needed to transport equipment and materials</li> <li>scheduled deliveries to avoid local congestion;</li> </ul>	<ul> <li>Site Manager</li> <li>Contractor</li> <li>Developer</li> <li>EO</li> </ul>	<ul><li>Construction</li><li>Operation</li></ul>
Records	A photographic record of the road condition should be maintained throughout the various phases of the development/s. This provides an objective assessment and mitigates any subjective views from road users.	<ul><li>Contractor</li><li>Developer</li><li>EO</li></ul>	<ul><li>Construction</li><li>Operation</li><li>Decommissioning</li></ul>
Signage and Notifications	Post relevant road signage along affected routes.	<ul><li>Site Manager</li><li>Contractor</li></ul>	<ul> <li>Construction</li> </ul>

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
		EO	_
	The developer shall ensure that the contractor erects temporary signs warning motorists of construction vehicles on the approaches to the access road.	<ul><li>Contractor</li><li>Developer</li><li>EO</li></ul>	
Vehicle and Road Management	<ul> <li>All unsurfaced site roads must be regularly sprayed with water or dust suppression products to reduce dust generation</li> <li>The D1039, D2524, D2636, D560 and site access roads must be regularly sprayed with water or dust suppression products to reduce dust generation</li> <li>All vehicles that travel on-site must be roadworthy to ensure noise and emissions levels comply to national vehicle standards, thereby minimising noise &amp; exhaust pollution</li> <li>All vehicles that travel on-site must not be overloaded, and abnormal vehicles must comply to relevant legislation for overweight loads, to ensure lowest possible road surface damage.</li> <li>All vehicles that travel on the D1039, D2524, D2636, D560 and site access roads must be roadworthy to ensure noise and emissions levels comply to national vehicles must comply to national vehicles and emissions levels comply to national vehicles and emissions levels comply to national vehicles that travel on the D1039, D2524, D2636, D560 and site access roads must be roadworthy to ensure noise and emissions levels comply to national vehicles that travel on the D1039, D2524, D2636, D560 and site access roads must not be overloaded, and abnormal vehicles must comply to relevant legislation for overweight loads, to ensure lowest possible road surface damage.</li> <li>All vehicles that travel on the R33 and N4 must be roadworthy to ensure noise and emissions levels comply to national vehicle standards, thereby minimising noise &amp; exhaust pollution</li> </ul>	<ul> <li>Site Manager</li> <li>Contractor</li> <li>Developer</li> <li>EO</li> </ul>	<ul> <li>Construction</li> <li>Operation</li> </ul>



Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
	All vehicles that travel on the R33 and N4 must not be overloaded, and abnormal vehicles must comply to relevant legislation for overweight loads, to ensure lowest possible road surface damage.		
Intersection Safety	Regular preventative maintenance of roads within the immediate vicinity of the site should be conducted over weekends to minimise the impact on the average construction period.	<ul><li>Site Manager</li><li>Contractor</li><li>EO</li></ul>	<ul> <li>Construction</li> </ul>
	Reduce speed at intersections and use appropriate traffic warning signs	-	<ul><li>Construction</li><li>Operation</li></ul>
	Identify alternative routes where possible		
	Request the assistance of local law enforcement		
	Ensure that all construction vehicles are roadworthy, visible, adequately marked, and operated by an appropriately licenced operator.		
	Provide drivers with advanced driver training.		
Permits	A permit must be obtained from the relevant authority for any abnormal loads transported.	<ul><li>Site Manager</li><li>Contractor</li><li>EO</li><li>Operator</li></ul>	<ul><li>Construction</li><li>Operation</li><li>Decommissioning</li></ul>



### Table 7-19 – Visual: EMPr Mitigation and Management Measures

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe	
VISUAL				
<ul> <li>Impact Management Outcome:</li> <li>To ensure that the changes to the landscape character of the area are mitigated to minimise the negative impact.</li> </ul>				
<ul> <li>Indicator and Compliance Mechanism:</li> <li>Health, safety, environmental and community incident and complaints management system register.</li> <li>Incident classification and reporting management procedure (to be developed).</li> <li>Monitoring and audit reports.</li> </ul>				
Visual receptors	Retain and maintain natural vegetation in all areas outside of the development footprint, but within the project site.         Ensure that vegetation is not unnecessarily removed during the construction period.         Plan the placement of laydown areas and temporary construction equipment camps in order to minimise vegetation clearing (i.e. in already disturbed areas) where possible.         Restrict the activities and movement of construction workers and vehicles to the immediate construction site and existing access roads.         Ensure that rubble, litter, and disused construction materials are appropriately stored (if not removed daily) and then disposed of regularly at licensed waste facilities.	<ul> <li>Site Manager</li> <li>Contractor</li> <li>EO</li> <li>Operator</li> </ul>	<ul> <li>Construction</li> <li>Operation</li> <li>Decommissioning</li> </ul>	

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
	Reduce and control construction dust using approved dust suppression techniques as and when required (i.e. whenever dust becomes apparent).		
	Restrict construction activities to daylight hours whenever possible in order to reduce lighting impacts.		
	Retain / re-establish and maintain natural vegetation in all areas outside of the development footprint.		
	Maintain the general neat and tidy appearance of the facility as a whole.		
	Monitor rehabilitated areas, and implement remedial action as and when required.		
	Investigate the potential to screen affected receptor sites (if applicable and located within 1km of the facility) with planted vegetation cover (Alternative 2)		
Flicker	Adjust wind turbine locations to reduce the number of receptors likely to experience shadow flicker.	<ul><li>Site Manager</li><li>Contractor</li></ul>	<ul> <li>Operation</li> </ul>
	Consult with participating landowners or identified receptors who may experience shadow flicker impacts to identify feasible and reasonable management and mitigation measures, should they be required.	<ul><li>EO</li><li>Operator</li></ul>	
	Installation of screening structures and/ or planting of trees to block shadows cast by the turbines on the identified affected receptors.		
	Investigate the use of turbine control strategies which shut down the offending turbines when shadow flicker is likely to occur on identified receptors is investigated		
Solar Glint	Use anti-reflective panels and dull polishing on structures, where possible and industry standard.	<ul><li>Site Manager</li><li>Contractor</li></ul>	<ul> <li>Operation</li> </ul>
	If specific sensitive visual receptors are identified during operation, investigate screening at the receptor site, where possible	<ul><li>EO</li><li>Operator</li></ul>	

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
Lighting	Aviation standards and CAA Regulations for turbine lighting must be followed.		
	The possibility of limiting aircraft warning lights to the turbines on the perimeter according to CAA requirements, thereby reducing the overall impact, must be investigated.		
	Install aircraft warning lights that only activate when the presence of an aircraft is detected, if permitted by CAA.		
	Shield the sources of light by physical barriers (walls, vegetation, or the structure itself).		
	Limit mounting heights of lighting fixtures, or alternatively use foot-lights or bollard level lights.		
	Make use of minimum lumen or wattage in fixtures.		
	Make use of down-lighters, or shielded fixtures.		
	Make use of Low-Pressure Sodium lighting or other types of low impact lighting.		
	Remove infrastructure not required for the post-decommissioning use of the site.	<ul> <li>Site Manager</li> </ul>	<ul> <li>Decommissioning</li> </ul>
	Rehabilitate all areas. Consult an ecologist regarding rehabilitation specifications.	EO	
	Monitor rehabilitated areas post-decommissioning and implement remedial actions.		



### Table 7-20 – Socio-Economic: EMPr Mitigation and Management Measures

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe	
SOCIO-ECONOMIC				
<ul> <li>Impact Management Outcom</li> <li>To ensure that the negative</li> <li>To ensure that the positive</li> </ul>	e: socio-economic impacts are mitigated and managed. socio-economic impacts are enhanced.			
<ul> <li>Indicator and Compliance Mechanism:</li> <li>Induction training and records.</li> <li>Health, safety, environmental and community incident and complaints management system register.</li> <li>Monitoring and audit reports.</li> <li>Incident classification and reporting management procedure (to be developed).</li> <li>PPE Register.</li> <li>Occupational health and safety plan (to be developed).</li> <li>Health and safety protocol (to be developed).</li> <li>Health and safety protocol (to be developed).</li> <li>Employment records and community engagement local enterprise development records.</li> </ul>				
Employment	Recruitment policies must ensure preference for local residents.         Furthermore, a monitoring system should be implemented to assess local employment levels.         A local skills database should be developed and updated regularly to maximise the uptake of local labour.         An Environmental Control Officer (ECO) should be appointed to monitor the establishment phase of the construction phase.	<ul> <li>Site Manager</li> <li>Contractor</li> <li>Developer</li> </ul>	<ul> <li>Construction</li> <li>Operation</li> </ul>	



Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
	Training programmes must be implemented to recognise prior learning and enable local participants for employment. Increase security in the Project area to regulate safety and population influx.	<ul><li>Site Manager</li><li>Contractor</li></ul>	<ul><li>Construction</li><li>Operation</li><li>Decommissioning</li></ul>
Employee Management	The applicant and the contractors should develop a Code of Conduct for the project. The code should identify what types of behaviour and activities by workers are not permitted in agreement with surrounding landowners and land managers.	<ul><li>Site Manager</li><li>Contractor</li><li>Developer</li></ul>	<ul><li>Construction</li><li>Operation</li></ul>
	The applicant and the contractor should implement a Tuberculosis and HIV/AIDS awareness programme for all construction workers at the outset of the construction phase.		<ul> <li>Construction</li> </ul>
	The applicant should implement measures to assist and, if needed, fairly compensate potentially affected surrounding landowners whereby damages to farm property, stock theft or significant disruptions to farming activities can be minimized or reduced. Measures should be agreed on before construction commences.		<ul> <li>Operation</li> </ul>
	No construction workers, with the exception of security personnel, should be allowed to stay on the site overnight.	<ul><li>Site Manager</li><li>Contractor</li></ul>	<ul> <li>Operation</li> </ul>
	The movement of workers on and off the site should be closely managed and monitored by the contractors/security. In this regard the contractors should be responsible for making the necessary arrangements for transporting workers to and from site on a daily basis.		
Complaints	A complaints register should be available on site to any individual who may have a particular complaint with regards to the construction or operations processes.	<ul> <li>Site Manager</li> <li>Contractor</li> <li>EO</li> </ul>	<ul><li>Construction</li><li>Operation</li></ul>
	The community should be able to contact the site manager or his/her representative to report any issues which they may have. The site manager and		



Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
	his/her representative should be stationed within the area and should therefore be available on hand to deal with and address any concerns which may be raised.		
	The community should be able to contact the site manager to report any issues which they may have. The site manager should be stationed within the area and should therefore be available on hand to deal with and address any concerns which may be raised.		<ul> <li>Operation</li> </ul>
Stakeholder Engagement	The applicant must establish a communications committee early on in the project to ensure inclusive planning and regular feedback from stakeholders.	Developer	<ul> <li>Operation</li> </ul>
	Community development should be guided by a community needs analysis, drawn up by a third party and based on local socio-economic conditions, a review of planning documents such as the IDP, and discussions with local government and community representatives. Interventions should be planned in collaboration with other energy developers in the area where relevant.		
	Close liaison with local municipal managers, local councillors and other stakeholders involved in socio-economic development is required to ensure that any projects are integrated into wider socio-economic development strategies and plans.		
	Close coordination with the municipality is required, including regular meetings.		



### Table 7-21 – Bats: EMPr Mitigation and Management Measures

Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
BATS			
<ul><li>Impact Management Outcom</li><li>To minimise impacts to bate</li></ul>	e: s and their habitat		
<ul> <li>Indicator and Compliance Mechanism:</li> <li>Induction training and records.</li> <li>Incident classification and reporting management procedure (to be developed).</li> <li>Environmental awareness programme/toolbox talks.</li> <li>Monitoring and audit reports.</li> </ul>			
Impact on bats	Construction of roads should be 200 m away from any water sources, where practically possible and water crossings should also follow existing roads. Construction of roads should be 200 m away from any potential roosts.	<ul><li>Site Manager</li><li>Contractor</li><li>EO</li></ul>	Construction
	No construction of turbines within buffered areas identified for bats	•	•
	All proposed buffers must be respected, and No-Go areas avoided.	•	•
	Construction of roads may need to be reconsidered to avoid potential roosts and waterbodies and artificial light should be kept to a minimum.	•	•
	Adaptive mitigation during operational phase	<ul> <li>Site Manager</li> <li>Operator</li> <li>EO</li> </ul>	<ul> <li>Operation</li> </ul>
	Non-UV emitting lights must be used.		



Activity/Aspect	Impact Management Actions/Measures	Responsible Person	Priority Timeframe
	Use only minimal compulsory civil aviation lighting		
	Higher cut in speeds reduces the number of bat fatalities (Amorim et al 2012), and this will be required during times of peak activity (October to January). However, it would be possible to limit this to specific times of higher bat activity (18:00 – 21:00). Only once bat carcass and acoustic data collected during operational monitoring indicates acceptable fatalities rates can these suggested mitigation measures be relaxed, if appropriate.		

### 8 MANAGEMENT PLANS

A number of generic management plans have been included in the EMPr. The plans included below provide an indication of the requirements that must be followed on the proposed construction and operation of the Dalmanutha Hybrid Energy Facility. It must be noted that many of these plans can be updated at any stage depending on any changes that may occur on the site.

The following specific plans have been compiled:

- Emergency Response Plan (ERP);
- Waste Management Plan;
- Hazardous Substance Management Plan;
- Fire Management Plan;
- Alien Invasive Plant Management Plan;
- Plant Rescue and Protection Plan;
- Re-vegetation and Habitat Rehabilitation Plan;
- Stormwater Management Plan;
- Erosion Management Plan;
- Traffic and Transport Management Plan;
- Fauna Management Plan;
- Avifaunal Management Plan;
- Bat Management Plan;
- Soil Management Plan;
- Heritage and Palaeontological Management Plan;
- Grievance Mechanism; and
- HIV/AIDS Management Plan.

### 8.1 EMERGENCY RESPONSE PLAN

Appropriate resources must be provided to respond to accidental and emergency situations for operations and activities during construction and operation phases. The procedures will include plans for addressing training, resources, responsibilities, communication and all other aspects required to effectively respond to emergencies associated with their respective hazards.

This ERP is intended as a practical working document for the proposed Dalmanutha Hybrid Energy Facility. The purpose of this document is to provide the basic guidelines on how to respond to potential emergency situations that may arise during project activities. These potential emergency situations include medical emergencies and fires.

All activities associated with the project will require site-specific emergency response plans to mitigate impacts, which meet or exceed all applicable regulations.

The objectives of this plan are as follows:

- Protect the communities and the environment through the development of emergency response strategies and capabilities.
- Set out the framework for hazard identification in order to define procedures for response to the situations including the development of contingency measures.

- Structure a process for rapid and efficient response to and manage emergency situations during the construction and operational phases of the project.
- Assign responsibilities for responding to emergency situations.

The ERP must take the incident procedures referred to in Section 30 of the NEMA into account.

### 8.1.1 ROLES AND RESPONSIBILITIES

With respect to this plan, the Project Company (via the appointed EPC contractor/contractor/ principal contractor) has the responsibility to:

- Provide emergency response services (such as first aid and firefighting representative) and to structure and coordinate emergency response procedures for the project.
- Ensure that specific emergency responsibilities allocated to them are organised and undertaken.
- Ensure that employees and contractor third parties are trained and aware of all required emergency procedures.

### 8.1.2 EMERGENCY COMMUNICATIONS AND COORDINATION PLAN

In an emergency situation where there is an immediate threat to communities, personnel or the environment, the Project Manager will be notified immediately. The Project Manager will dispatch the Emergency Response Coordinator (or suitably tasked person) who will determine the appropriate plan of action depending on the severity of the emergency, the people affected, and the need to evacuate.

If there is a developing emergency or unusual situation, where an emergency is not imminent, but could occur if no action is taken, the Project Manager (or if the Project Manager is absent the Environmental Officer) is to be informed immediately. Once the emergency or unusual situation has been managed, the correct incident/near miss must be reported to the General Manager.

If an emergency situation poses a direct threat to communities in the area, the Environmental Officer and/or Social Officer will advise persons in the vicinity of the emergency to evacuate due to the potential risk. The appropriate government authorities will immediately be notified of such an emergency evacuation. The Emergency Response Coordinator (or suitably tasked person) will be tasked with responding to the potential risk. Should the emergency situation be such that it can be managed by Project Company, equipment and personnel will be deployed to the maximum extent necessary, so as to prevent/minimise potential risks.

### 8.1.3 RESPONSE TO INCIDENTS

An incident is any occurrence that has caused, or has the potential to cause, a negative impact on people, the environment or property (or a combination thereof). It also includes any significant departure from standard operating procedures. The reporting and investigation of all potential and actual incidents that could have a detrimental impact on human health, the natural environment or property is required so that remedial and preventive steps can be taken to reduce the potential or actual impacts because of all such incidents.

The actions resulting from any formal or informal investigations will be used to update the EMPr.

### 8.1.4 BUDGET FOR EMERGENCY RESPONSE

Costs for emergency response and management will be included in the capital expenditure budget for the construction phase and operational budget for the operational and decommissioning phases of the project.

### 8.1.5 VERIFICATION

An environmental emergency response system will be developed for the execution of emergency drills that will include the following, inter alia:

- Fire Drills
- Emergency Evacuation Drills
- Medical and Environmental Drills.

Reporting and monitoring requirements for the plan will include:

- Monthly inspections and audits
- Quarterly reporting of accidents/ incidents
- Reporting at the time of the incident and monthly spill reporting developed by the Environmental and Quality, Health and Safety departments
- Bi-annual emergency response drills
- Annual reporting on training

Emergency response drills and reporting will be maintained by the Project Manager and will provide information regarding required revisions to training or the emergency response actions. Each incident reported will be reviewed and investigated upon occurring. Actions will be identified where possible to improve the site's overall response to emergencies. Updates/revisions that are necessary to protect worker or community health and safety will be implemented immediately after approval by the General Manager. On a bi-annual basis, Key Performance Indicators (KPIs) will be compared against past-performance and analysed for trends to determine if there are areas for improvement. Changes because of the trend analysis and identified areas for improvement will be implemented following the project's change management system as required.

### 8.2 WASTE MANAGEMENT PLAN

### 8.2.1 WASTE HIERARCHY

A waste is any solid, liquid or contained gaseous material that is being discarded by, disposal, recycling, burning or incineration. Waste management options for a particular waste need to be considered according to the Waste Management Hierarchy (**Figure 8-1**) which reflects the relative sustainability of each of the options. One of the key principles underlying the waste management hierarchy is to ensure that waste is dealt with as high up the waste hierarchy as possible. Since all waste disposal options have some impact on the environment, the only way to avoid impact is not to produce waste in the first place, and waste reduction is therefore at the top of the hierarchy. Re-use, followed by recovery techniques (recycling, composting and generating energy from waste) follow, while disposal to landfill or by incineration (the worst options) are at the bottom of the hierarchy.

In deciding on the most appropriate disposal route, both environmental and economic costs and benefits need to be considered. This decision must be reached taking into account all the costs and impacts associated with waste disposal, including those associated with the movement of waste.

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### 8.2.2 PROJECT STAGES

The purpose of this section is to assess the construction, operational processes of the proposed Dalmanutha Hybrid Energy Facility in order to identify short comings, like raw materials procurement, infrastructure, employee training, health and safety, transportation, storage, compliance with legislative requirements, emergency preparedness and waste streams arising from an operation and its related activities, as well as the current waste management practices per waste stream. The assessment serves as the baseline against which any problem areas or gaps in waste management practises, process technology and environmental authorisations are identified and against which future performance objectives, activities and targets can be set.

The project stages are described below with the waste generation and management methods described in the corresponding tables below them including:

- Details on how waste will be managed during the construction and operational phases taking into consideration the waste management hierarchy;
- Details of the procedure for the separation of non-recyclable and recyclable waste;
- Details of the management of non-recyclable waste i.e. how waste will be stored on site during construction and operational phases, including the frequency for the removal of waste from the site and an indication of the landfill site where it will be disposed;
- Details for the management of recyclable waste e.g. the type of waste materials that will be recycled on site and the details pertaining to the offloading, sorting, handling, storage and collection procedures for the waste types (e.g. compaction and bailing, breaking of glass etc.); and
- The frequency for the removal of waste from the proposed development to where it will be finally managed must be included.

Waste Management at the project site will be undertaken in line with the EMPr to consider the correct disposal of general and hazardous waste generated on the project. **Table 8-1** describes the different waste products that the proposed project will produce, as well as the various options to dispose of them. Waste will mainly be generated during the construction phase. During operation, contractors are only on the site for limited amount of time as and when maintenance is required.

Waste	Type of Waste	Management Options		
Hydrocarbons (Contaminated soil)	Hazardous	<ul> <li>Fuel and oil spillages can be a source of contamination of water sources and the soil. Management options include:</li> <li>Using spill kits to clean any spillages;</li> <li>Ensure storage facilities are maintained and meet industry regulations;</li> <li>Transportation and storage of fuel must be regulated and correct managed according to the EMPr;</li> <li>All hazardous waste is to be disposed of at a registered hazardou landfill (safe disposal certificates must be obtained).</li> </ul>		
Contaminated Personal Protective Equipment (PPE)	Hazardous	<ul> <li>PPE can be contaminated during handling of hydrocarbons. Management options include:</li> <li>Store contaminated PPE in hazardous waste skips along the servitude;</li> <li>Ensure contaminated PPE is disposed of at a registered hazardous landfill (safe disposal certificates must be obtained).</li> </ul>		
General waste	General	<ul> <li>General waste (inorganic matter) can be disposed of as per normal and form part of the municipal waste management system. Management options include:</li> <li>Ensure waste is stored securely in refuse bins;</li> <li>Co-ordinate waste removal with the general removal of waste from the contractor laydown area .</li> </ul>		
Food waste	General	<ul> <li>Food waste is generated as site personnel take their meals on the construction site. Management options include:</li> <li>Store any waste and packaging into a labelled food waste bin;</li> <li>Co-ordinate waste removal with the removal of waste from the contractor laydown area; and</li> <li>Co-ordinate waste removal with the general removal of waste.</li> </ul>		

Table	8-1 -	- Waste	Management	Options
Table	0-1-	masic	managemen	options

### 8.3 HAZARDOUS SUBSTANCES MANAGEMENT PLAN

Hazardous substances are chemicals or materials that can cause acute or chronic harm to health, be it humans or the environment. The key potential sources of impact related to the management of hazardous chemical substances (HCS) and fuel during construction relate to the risk of accidental release of hydrocarbons to the environment, accidental exposure to workers, and fire and explosion risks.

Potential impacts associated with these risks, if poorly managed, include:

- Impact to soil and/or groundwater, which may result in degradation of the resource and requirement for remedial action;
- Impacts on pastoralist livelihoods due to contamination of pasture or water resources and consequent impacts to their, health, livelihood and animals;
- Impacts on human health & safety due to either direct exposure or through fire/explosion;
- Gas emissions associated with the combustion of fuel, are mainly compounds of nitrogen, carbon including very small traces of sulphur and particulate matter; and
- Fugitive emissions from HCS & fuel storage.

The purpose of this Hazardous Substances Management Plan (HSMP) is to provide a framework for the management of hazardous substances onsite during the construction and operation of the Dalmanutha Hybrid Energy Facility:

- Ensure the handling and storage of hazardous substances are in accordance with relevant standards;
- To ensure that the storage and handling of chemicals and hydrocarbons on-site does not cause pollution to the environment or harm to persons;
- To ensure that the storage and maintenance of machinery onsite does not cause pollution of the environment or harm to persons.

### 8.3.1 HAZARDOUS SUBSTANCES MANAGEMENT PROCEDURE

A plan for managing the transportation, delivery, storage and handling of hazardous substances onsite is detailed below. A method statement detailing the specific storage and handling practices during construction must be prepared by the Contractor prior to the commencement of construction.

### **REGISTER OF HAZARDOUS SUBSTANCES**

Contractors shall establish inventories or registers of hazardous substances on site. The inventory is to be updated when new hazardous substances are introduced to the workplace or the use of existing hazardous substances is discontinued. Both the chemicals' register and the Material Safety Data Sheets (MSDSs) must be readily available at a central location or near where the chemicals are being stored or used.

#### MSDS

It is standard practice that an MSDS is provided by the manufacturer or supplier of all hazardous substances. An MSDS is required for all chemicals and substances on site. These MSDSs are to be made available to all parties affected by the use or storage of the chemical. MSDSs are the key to communicating hazards and safe handling practices for chemicals. In addition, MSDS information is to be made available to all employees.

#### DELIVERIES

Transport of all hazardous substances must be in accordance with the relevant legislation and regulations. Contractors are responsible for identifying and securing any necessary permits for any proposed bulk fuel storage arrangements. The supplier will fill contractors fuel tanks; fuelling is the responsibility of the licensed contractor who will be supervised by the storage/work area supervisor. No 'black-market' or 'grey-import' fuels shall be used. All fuels purchased must be legitimate and subject to required duties and taxes.

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Prior to fuel transfer the operator will verify that: all fuel transfer hoses have been connected properly and couplings are tight; transfer hoses are not obviously damaged; fuel transfer personnel are familiar with procedures; for fuelling stations, personnel are located at both the fuel truck and fuel transfer tank(s) and have the ability to shut off fuel flow manually; a means of communication has been established between the two people transferring fuel; and a high liquid level shutoff device can be substituted for the person at the delivery tank, in which case operation of the shutoff will be verified each time it is used; The fuel contractor will clean up and report any accidents or spills immediately to the project ESHS team.

### ENVIRONMENT AND OCCUPATIONAL HEALTH AND SAFETY

The following requirements are additional to any applicable requirements established in other LTWP management plans such as the Occupational Health & Safety Management Plan:

- Storage facilities will have the applicable MSDS available;
- Smoking will be strictly prohibited from any areas where fuel loading operations take place;
- Appropriate signage will be used to identify potential spill risks;
- Any accidental damage to containment structures will be inspected immediately and appropriate repairs undertaken. The extent of damage will be reported in writing to WP as well as remedial repairs effected together with the date of repairs and any follow up inspection. Any release of fuels or other substance will be cleaned up;
- All used fuel / oil products will be collected in tanks marked "Waste Oil"; and
- All hydrocarbon associated wastes will be managed in line with the Waste Management Plan.

### **MATERIALS STORAGE**

- All temporary hydrocarbon storage will be situated above ground. There will be no buried storage tanks permitted.
- All chemicals, fuels and other hazardous materials are to be stored in designated and bunded areas, where the bunded area is impermeable and is impervious to the stored substance as per the requirements of SABS 089:1999 Part 1. The bunded area will contain 110% volume of the largest container stored.
- Bunds and service area platforms to be cleaned and maintained regularly.
- SABS approved Spill kits must be made available on-site for the clean-up of spills and leaks of contaminants. The relevant construction crew members must be trained in their use.
- Keep a record of all hazardous substances stored on site. Clearly label all the containers storing hazardous waste.
- The storage of flammable and combustible liquids such as oils will be in designated areas which are appropriately bunded, and stored in compliance with Material Safety Data Sheets (MSDS) files and applicable regulations and safety instructions.
- Chemical and hydrocarbon storage facilities shall be covered to prevent rainfall ingress into secondary containment units and well-ventilated
- Any storage and disposal permits/approvals which may be required must be obtained, and the conditions attached to such permits and approvals will be compiled with.
- An effective monitoring system must be put in place to detect any leakage or spillage of all hazardous substances during their transportation, handling, installation and storage.

### SPILL AND LEAK MANAGEMENT AND PREVENTION

- In the event of a major spill or leak of contaminants, the relevant authorities must be informed. The relevant construction crew members must be trained in their use.
- Spilled cement must be cleaned up immediately and, stored as hazardous waste and disposed of at a suitably licensed hazardous waste disposal facility.
- Routine servicing and maintenance of vehicles must not be undertaken onsite (except for emergencies). If repairs of vehicles must take place, an appropriate drip tray must be used to contain any fuel or oils.
- Any water that collects in bunds must not be allowed to stand. Should the water be contaminated, it is to be removed and treated prior to discharge, or disposed of as hazardous waste. Clean stormwater contained within the bunds may be reused.
- No chemicals must be stored or vehicle maintenance undertaken within 100m of wetlands or drainage lines.
- Construction machinery must be stored in an appropriately sealed area. If machinery cannot be stored in a sealed area then a drip tray must be used to prevent spillage from any leaks.
- As far as practicable, all equipment servicing / maintenance shall be undertaken within designated workshop areas.
- All generators on site, including generators that are not in use must be located in a bunded area or on a drip tray.
- Bunded areas and drip trays must be maintained on a regular basis.
- Diesel generators and water pumps shall be located in secondary containment areas or shall be self-contained to prevent loss of fuels and oils;
- Precautions must be in place to limit the possibility of oil and other toxic liquids from entering the soil or clean stormwater system.
- Upon completion of construction, the area must be cleared of potentially polluting materials.
- Emergency response planning will be managed via the Emergency Preparedness and Response Plan.

### 8.3.2 OPERATIONAL PHASE

During the operational phase of the project limited hazardous substances and chemicals will be stored onsite. During maintenance activities, contractors will need to produce a method statement detailing the specific storage and handling practices. The following measures need to be implemented onsite during the operational phase of the project.

- Hazardous substances must be stored in sealed containers within a clearly demarcated designated area.
- Care must be taken to ensure that spillage of oils and other hazardous substances are limited during maintenance. Handling of these materials must take place within an appropriately sealed and bunded area.
- Should any accidental spillage take place, it must be cleaned up according to specified standards regarding bioremediation.
- The storage of flammable and combustible liquids such as oils will be in designated areas which are appropriately bunded, and stored in compliance with Material Safety Data Sheets (MSDS) files and applicable regulations and safety instructions.
- Used oils and chemicals:

- Appropriate disposal must be arranged with a licensed facility in consultation with the administering authority;
- Waste must be stored and handled according to the relevant legislation and regulations.

### 8.3.3 INSPECTION, MONITORING AND TRAINING

Fuel storage areas must be inspected regularly to ensure bund stability, integrity, and function.

The contents of the Hazardous Substances Management Plan must be communicated to the staff through the induction training. On the job training can also be undertaken through the use of Environmental Toolbox Talks. All training must be undertaken as outlined in the relevant Training Procedure.

Examples of Toolbox Talks include:

- Storage of hazardous substances
- Working with hazardous substances
- Management of hazardous waste
- Spill Prevention

### 8.4 FIRE MANAGEMENT PLAN

The purpose of this plan is to address firefighting requirements throughout the construction of the project and to preserve and protect human life as well as tangible goods and equipment in the event of a fire.

- All construction camps shall be provided with portable fire extinguishing equipment, in accordance with all relevant legislation and must be readily accessible.
- The Contractor shall take specific measures to prevent the spread of veld fires, caused by activities at the campsites. These measures must include appropriate instruction of employees about fire risks and designated smoking areas.
- Fire prevention facilities must be present at all storage facilities. No open fires shall be allowed on site under any circumstance. No cooking on open fires shall be done onsite to prevent runaway fires.
- The Contractor shall have operational fire-fighting equipment available on site at all times. The level of firefighting equipment must be assessed and evaluated through a typical risk assessment process.
- Emergency numbers for local police and fire department etc. must be placed in a prominent area.
- Firefighting equipment must be placed in prominent positions across the site where it is easily
  accessible. This includes fire extinguishers, a fire blanket as well as a water tank.
- All construction staff must be trained in fire hazard control and firefighting techniques. Translators are to be used where necessary.
- All flammable substances must be stored in dry areas which do not pose an ignition risk to the said substances.
- Smoking must only be conducted in demarcated areas.
- Firefighting equipment must be regularly maintained by a suitable service provider.

### 8.5 ALIEN INVASIVE PLANT MANAGEMENT PLAN

The purpose of this Plan is to provide a framework for the management of alien and invasive plant species during the construction and operation of the project, which in turn serves to manage open spaces, as required. The broad objectives of the plan include the following:

- Ensure alien plants do not become dominant in parts or the whole site through the control and management of alien and invasive species presence, dispersal and encroachment.
- Managing and maintaining the ecosystem in a near-natural state and restoring and/or rehabilitating the ecosystems to such a state.
- Develop and implement a monitoring and eradication programme for alien and invasive species.
- Promote the natural re-establishment and planting of indigenous species in order to retard erosion and alien plant invasion.

- Monitor for early detection, to find species when they first appear on site. This should be as per the frequency specified in the management plan, and should be conducted by an experienced botanist. Early detection should provide a list of species and locations where they have been detected. Summer (vegetation maximum growth period) is usually the most appropriate time, but monitoring can be adaptable, depending on local conditions.
- Monitor for the effect of management actions on target species, which provides information on the effectiveness of management actions. Such monitoring depends on the management actions taking place. It should take place after each management action.
- Monitor for the effect of management actions on non-target species and habitats.
- Stockpiles must be kept clear of weeds and alien vegetation growth by regular weeding.
- Alien vegetation and the spread of exotic species on the site will need to be controlled.
- The contractor must be responsible for implementing a programme of weed control (particularly in areas where soil has been disturbed); and grassing of any remaining stockpiles to prevent weed invasion.
- Herbicide use shall only be allowed according to contract specifications. The application shall be
  according to set specifications and under supervision of a qualified technician. The possibility of
  leaching into the surrounding environment shall be properly investigated and only suitable
  herbicides shall be used.
- The use of pesticides and herbicides on the site must be discouraged as these can impact on important pollinator species of indigenous vegetation. Use of these should only be permitted where absolutely necessary.
- Correct rehabilitation with locally indigenous species.
- Monitoring programme to ensure that rehabilitation efforts are successful to ensure that risks such as erosion, spread of exotic species and the edge effect are avoided.
- Constant maintenance of the area to ensure re-colonisation of floral species.
- Ensure regular removal of alien species, which may otherwise jeopardise the proliferation of indigenous species.
- Annual on-site alien invasive species monitoring should be conducted. Monitoring should focus on:
- All sites disturbed during the construction phase;
- Riparian/wetland areas adjacent to construction sites; and

 Monitoring should assess species type and density, and these data should inform the scope of ongoing alien invasive species control.

### 8.6 PLANT RESCUE AND PROTECTION PLAN

The purpose of the plant rescue and protection plan is to implement avoidance and mitigation measures, in addition to the mitigation measures included in the EMPr to reduce the impact of the development of the project on listed and protected plant species and their habitats, and to provide guidance on search and rescue of species of conservation concern.

- The location of all transplanted rescued plants must be recorded, along with the identity of the plant.
- The health / vigour of each transplanted individual should be monitored as per the frequency and duration specified in the management plan.
- As a scientific control, an equal number of non-transplanted individuals of the same species, within similar habitats, should be monitored in the same way as the transplanted specimens. This will provide comparative data on the survival of wild populations relative to transplanted plants.
- If populations of threatened plant species are found to occur on site, annual monitoring of population health should take place. This should be appropriate to the species concerned.
- Vegetation clearing must only commence after a walk down has been conducted by a suitably qualified person and the necessary permits obtained.
- Vegetation clearing to be kept to a minimum. No unnecessary vegetation to be cleared.
- Vegetation removal must be limited to the construction site and must be removed only as it becomes necessary rather than removing all the vegetation throughout the site at once.
- Materials must not be delivered to the site prematurely which could result in additional areas being cleared or affected.
- No vegetation to be used for firewood.
- Gathering of firewood, fruit, medicinal plants, or any other natural material onsite or in areas adjacent to the site is prohibited unless with prior approval of the ECO.
- Construction site office and laydown areas must be clearly demarcated and no encroachment must occur beyond demarcated areas.
- All natural areas impacted during construction must be rehabilitated with locally indigenous plant species or grassed accordingly.
- The use of pesticides and herbicides on the site must be discouraged as these can impact on important pollinator species of indigenous vegetation. Use of these should only be permitted where absolutely necessary.
- Soil stockpiles must not become contaminated with oil, diesel, petrol, garbage or any other material, which may inhibit the later growth of vegetation in the soil. Spillage can result in a loss of soil functionality thus limiting the re-establishment of flora.
- It is a legal requirement to obtain permits for specimens or protected species that will be lost due to construction of the project.
- A detailed pre-construction walk-through survey will be required during a favourable season where possible, to locate any individuals of protected plants, as well as for any populations of threatened plant species. This survey must cover the footprint of all approved infrastructure, including internal access roads and substations. The best season is early to late Summer if

possible, taking administrative processes into account, but will be influenced by recent rainfall and vegetation growth.

- It is possible that some plants lost to the development can be rescued and planted in appropriate places in rehabilitation areas, but the description and appropriateness of such measures must be included in a Plant Rescue Plan. Any such measures will reduce the irreplaceable loss of resources as well as the cumulative effect. Note that Search and Rescue is only appropriate for some species and that a high mortality rate can be expected from individuals of species that are not appropriate to transplant.
- Prior to construction commencing, a Plant Rescue Plan must be compiled to be approved by the appropriate authorities as part of the EMPr approval.
- For any plants that are transplanted, annual monitoring should take place to assess survival. This should be undertaken as per the frequency specified in the management plan and be undertaken by a qualified botanist. The monitoring programme must be designed prior to translocation of plants and should include control sites (areas not disturbed by the project) to evaluate mortality relative to wild populations.
- No collecting or poaching of any plant species.

**Rescued** plants

- The location of all transplanted rescued plants must be recorded, along with the identity of the plant.
- The health / vigour of each transplanted individual should be monitored as per the frequency and duration specified in the management plan.
- As a scientific control, an equal number of non-transplanted individuals of the same species, within similar habitats, should be monitored in the same way as the transplanted specimens. This will provide comparative data on the survival of wild populations relative to transplanted plants.

Threatened species

If populations of threatened plant species are found to occur on site, annual monitoring of population health should take place. This should be appropriate to the species concerned.

For permitting purposes, the following flora survey is required prior to construction activities taking place:

- Detailed floristic walk-through survey of all footprint areas in order to document composition, especially of protected species. It is suggested this be undertaken after an appropriate time-period after rainfall, where possible, to allow emergence of any species of potential concern. The survey must also cover all footprint areas, including final road alignments. Renewable energy projects similar to the one assessed here tend to have high fluidity in terms of layout and technology, due to the current rapid evolution of the technology, which allows more efficient deployment of infrastructure. However, this means that "final" layouts regularly change. The walk-through survey:
- Must assess the footprint that will be constructed if this changes then the new footprint areas must be subject to a walk-through survey in full.
- Must be undertaken in the correct season, if possible, taking administrative processes into account.
- Must be adequately resourced to ensure it is done properly.
- Must be undertaken by a competent botanist.

### 8.7 RE-VEGETATION AND HABITAT REHABILITATION PLAN

The purpose of the rehabilitation plan is to ensure that areas cleared or impacted during construction activities are rehabilitated with a plant cover that reduces the risk or erosion from these areas as well as restores some ecosystem function. The purpose of the rehabilitation plan for the site can be summarised as follows:

- Achieve long-term stabilisation of all disturbed areas to minimise erosion potential.
- Re-vegetate all disturbed areas with suitable local/indigenous plant species or grass/crop.
- Minimise visual impact of disturbed areas.
- Ensure that disturbed areas are safe for future uses.

- Rehabilitation Plan must be compiled by an approved ecologist prior to the start of construction and decommissioning.
- All management actions associated with rehabilitation must be recorded after each management action has taken place.
- All rehabilitated areas should be monitored to assess vegetation recovery. This should be for a minimum of three years after post-construction rehabilitation but depends on the assessed trajectory of rehabilitation (whether it is following a favourable progression of vegetation establishment or not this depends on the total vegetation cover present, and the proportion that consists of perennial growth of desired species). For each monitoring site, an equivalent comparative site in adjacent undisturbed vegetation should be similarly monitored. Monitoring data collection should include the following:
  - total vegetation cover and height, as well as for each major growth form;
  - species composition, including relative dominance;
  - soil stability and/or development of erosion features;
  - representative photographs should be taken at each monitoring period.
- Monitoring of rehabilitated areas should take place at the frequency and for the duration determined in the rehabilitation plan, or until vegetation stability has been achieved.
- Re-vegetation must aim to accelerate the natural succession processes so that the plant community develops in the desired way, i.e. promote rapid vegetation establishment.
- Re-vegetation of disturbed surfaces must occur immediately after construction activities are completed. This must be done through seeding with suitable crop or locally indigenous species typical of the representative botanical unit.
- Re-vegetation of the disturbed site is aimed at approximating as near as possible the existing vegetative conditions prevailing prior to construction.
- Seeds from surrounding seed banks can be used for re-seeding.
- Rehabilitation must be executed in such a manner that surface run-off will not cause erosion of disturbed areas.
- Planting of indigenous tree species in areas not to be cultivated or built on must be encouraged.
- Habitat destruction must be limited to what is absolutely necessary for the construction of the infrastructure, including the construction of new roads. In this respect, the recommendations from the Biodiversity Assessment must be applied strictly. Personnel must be adequately briefed on the need to restrict habitat destruction, and must be restricted to the actual construction area.

- Monitoring programme to ensure that rehabilitation efforts are successful to ensure that risks such as erosion, spread of exotic species and the edge effect are avoided.
- Monitoring of rehabilitated and revegetated sites should be conducted annually during decommissioning and for a two-year period after decommissioning;
- Key aspects that should be monitored include:
- Successful establishment and coverage of vegetation;
- Sites of erosion;
- The findings of monitoring should be used to inform the need for additional rehabilitation and/ or corrective actions.

### 8.8 STORMWATER MANAGEMENT PLAN

The main principles in stormwater management include:

- Confine or divert any unpolluted water to a 'clean' water system, and polluted water to a 'dirty' water system;
- 'Clean' and 'dirty' water systems must be designed and constructed to prevent crosscontamination between the 'clean' and 'dirty' water systems; and
- Appropriate maintenance and management of storm water related infrastructure.

The proposed water systems or infrastructure are to be designed to prevent any potential contamination of natural water resources in the area.

A Storm Water Management and Surface Water Protection Plan cannot be compiled until the detailed designs are complete. It is stipulated in this EMPr that a Storm Water Management Plan must be compiled before any construction commences and implemented during the construction phase. This plan must indicate how all surface runoff generated as a result of the project and associated activities (during both the construction and operational phases) will be managed prior to entering any natural drainage system or wetland and how surface water runoff will be retained outside of any demarcated buffer zones and subsequently released to simulate natural hydrological conditions.

A Storm Water Management Plan will be required to support the relevant facility processes. A stormwater management plan must be developed in the preconstruction phase, detailing the stormwater structures and management interventions that must be installed to manage the increase of surface water flows directly into any natural systems. The stormwater control systems must be inspected on an annual basis to ensure these are functional. Effective stormwater management must include effective stabilisation (gabions, Reno mattresses or similar) of exposed soil and the revegetation of any disturbed water courses.

It is assumed that once constructed, the foundation excavation will be backfilled, topsoiled, and grassed. Gravel should be places around the base of the wind turbine as a LID intervention to encourage infiltration of runoff from the turbine support back into the soil. This will result in clean runoff from the site. It is recommended that runoff be allows to free-drain back into the environment as overland flow, as opposed to concentrating the flow and introducing a risk of localized erosion at the outlet point.

#### **CONCEPTUAL SWMP**

### **DESIGN CRITERIA AND PROJECT OBJECTIVES**

As per Best Practice Guideline – G1: Stormwater Management (DWAF, 2006) and GN 704 the SWMP for the site will seek to achieve certain objectives based on a philosophy of protecting the receiving environment from hydrological impacts.

- Clean and dirty water should be separated, and it should be ensured that all stormwater structures and designed to keep dirty and clean water separate and can accommodate a defined precipitation event;
- The clean water catchment area should be maximized, and clean water should be routed to a natural watercourse with minimal damage to that watercourse in terms of quantity and frequency of discharge;
- Dirty areas should be minimized, and runoff from these areas contained and neither treated to an
  acceptable quality to discharge to the environment or removed from the site for disposal; and
- Natural watercourses and the environment should be protected from contamination by dirty areas by ensuring that the dirty water cannot enter the clean water system by spillage or seepage.

In addition to these aims, the following project specific objectives for this SWMP were developed based on the site-specific characteristics:

- Stormwater should be directed such that no water flows in an uncontrolled manner that may jeopardise the safety of personnel or infrastructure, or such that is a nuisance;
- Protection of the soils by preventing erosion is also a key requirement of the SWMP;
- Minimise modification of the natural topography of the area and avoid any modification of the natural watercourses as far as possible;
- Do not impede surface or subsurface water flows unless unavoidable;
- Include a monitoring and inspection system for spills, leaks and erosion and commit to remediation where needed;
- Review and improve the SWMP regularly;
- Ensure no infrastructure, except road crossings, are built within the watercourses; and
- Do not build infrastructure, in particular infrastructure containing potential pollutants, within 100 m of natural drainage lines.

### DELINEATION OF CLEAN AND DIRTY AREAS

The development area is divided into clean and dirt areas as follows:

Dirty areas:

- The workshop where oils and lubricants may be stored and used;
- A chemical storage area will be constructed for the operational phase of the project, which will include proper containment and bunding for all chemicals stored on site;
- Transformers at the substation, as these will contain oil;
- The conservancy tanks, as this will contain sewage; and,
- Vehicle wash bay that has a hard standing surface on which vehicles are washed, generating dirt water which drains to a sump.

Clean areas are deemed to be all areas on the site outside of those stated above as dirty areas. Requirements for bunding of areas housing potential contaminants are specified in detail in the National Norms and Standards for the Storage of Waste (Notice 926 of 29 November 2012,

Department of Environmental Affairs, national Environmental Management: Waste Act 2008, Act No. 29 of 2008). The specification, which will apply to the development area, reads as follows: "bunds having a capacity which can contain at least 110% of the maximum content of the waste storage facility. Where more than one container or tank is stored, the bund must be capable of storing at least 110% of the largest tank or 25% of the total storage capacity, whichever is greater (in the case of drums the tray or bund size must be at least 25% of total storage capacity)." Bunded areas should be sized and sealed to ensure spilled contaminants cannot leak out of the bunded areas.

### SWMP DESIGN PHILOSOPHY FOR A WEF

A typical WEF is a large expanse of land, over the surface of which are located wind turbines, preferably at high points to optimise exposure to wind. The turbines are placed several hundred meters away from one another. A road network provided access to each turbine and the substation.

Cables run from the turbines to the substation (it is assumed that all cables are buried). The land within the site footprint on which components are placed is not altered in any way but the WEF development. Typical stormwater management interventions for each of these components during both construction and operational phases are defined in this section.

The SWMP will be guided by Low Impact Design (LID) principles. LID in land development aims to manage stormwater as close to its source as possible by simulating or enhancing natural processes. This is achieved by interception of rainfall on the catchment surface as it lands by enabling natural infiltration into the soil, increasing roughness using vegetation, and aiding soil stability by the establishment of vegetation. LID was selected as a suitable method for several reasons.

Firstly, LID addresses the risk of erosion and downstream sedimentation caused by concentrated flows. Concentrated flow emanating from a catchment has higher velocities and associated streamflow than overland flow. It is desirable to keep peak flow velocity below 1.5 m/s.

Secondly, by reducing concentrated flow, LID minimizes alteration of the pre-development hydrograph of the catchments in terms of peak discharge and duration of runoff. This is feasible because the total surface area modified by the WEF components is very small relative to the total surface area of the catchment (in order of 5%).

Finally, in terms of water quality, there are no water demands, uses, or discharges from a WEF meaning that only stormwater quality needs to be managed. Aside from dirty areas defined above, the only water contaminant will be suspended solids from disturbed soil during the construction phase and road runoff during construction and operational phases. The LID interventions specified below will effectively reduce the particle load in the water by settling in temporary sumps during construction, and filtering with vegetation lined channels and dissipaters during operation.

### SWMP FOR WIND TURBINE FOOTPRINT

The SWMP presented in this section is applicable to all turbines in the hybrid energy facility for both construction and operational phases.

### **CONSTRUCTION PHASE**

General principles are given to guide the planning of stormwater during the construction period. The construction period has the greatest hydrological impact and therefore careful planning is essential.

The foundation of a wind turbine is buried below ground surface, typically at a depth of 3.5 - 4.0 m below natural ground elevation. Thus, earth excavation is required. In addition to the foundation

works, a compacted hardstand adjacent to the foundation is required for laydown purposes. The following interventions are required for stormwater management during construction of the wind turbine:

Use excavated soil to form a diversion berm on the upslope of the foundation sitting. This will serve to divert clean surface runoff from upstream around the works. The upstream contributing catchment area is expected to be minor because all turbines are sited on high points in the topography. It is still necessary to minimize the water entering the area of disturbed soil.

Construct a temporary sump at a low point on the boundary of the works. This will serve to collect runoff and allow for settlement of particles out of the water. Pump out to the environment once settled.

If erosion is observed, place straw bales or grass mats in the area to protect the soil or construct silt fences to capture the eroded material and place back in the erosion gullies.

#### **OPERATIONAL PHASE**

It is assumed that once constructed, the foundation excavation will be backfilled, topsoiled, and grassed. Gravel should be places around the base of the wind turbine as a LID intervention to encourage infiltration of runoff from the turbine support back into the soil. This will result in clean runoff from the site. It is recommended that runoff be allows to free-drain back into the environment as overland flow, as opposed to concentrating the flow and introducing a risk of localized erosion at the outlet point.

### SWMP FOR ACCESS ROADS

It is assumed that the access roads will be gravel roads. The following interventions are recommended for stormwater management on the road:

The roads should be cambered to drain to one side.

V-drains should be constructed along the length of the road on both sides. The upslope side should be sized to have sufficient capacity to convey runoff from the upstream contributing catchment. The v-drain on the downslope side of the road should have sufficient capacity to contain runoff from the road surface.

Where the slope is gentle, the v-drains shall be soil, planted with vegetation forming a permeable swale. This is a LID intervention and will facilitate infiltration of flow into the soil, protect against erosion, and allow for settling and filtration of suspended solids and motor oil that may come from the road.

Where the slope is steep, the v-drain shall be lined with riprap. This too is permeable but provides greater resistance against scour that may result from velocities of flow from steep slope.

All v-drains should follow the natural topography of the land and rain ultimately to the watercourse.

If the outlet of the road drains into the watercourses, an energy dissipater shall be installed. This would consist of gabion mattresses with a step down at the inlet, widening and daylighting to meet natural ground level at which point rip rap shall be placed. This will effectively dimmish the flow and reintegrate it into the natural environment and enter into the watercourse without causing erosion.

At a shallow road crossing with watercourses, a drift shall be constructed for traffic. The drift shall be constructed of concrete on compacted soil. The downslope of the drift shall be lined with gabion mattresses and riprap to dissipate the flow over the drift prior to release into the watercourse.

The roads throughout the site have been assumed to be class 3 roads. As such, the 1:20 year event should be used in sizing the culverts. This peak event varies throughout the catchment position and whether a major or minor crossing occurs.

At deeper road crossings with watercourses, culverts shall be constructed. Culverts are recommended to be concrete, with wing walls and gabion mattresses and riprap on the downstream side to dissipate the energy of water flowing through the culvert. Number of culvert opening should be maximized to distribute as much as possible.

It is recommended that for major crossings, the proponent utilises a low-level crossing or portal culverts and for minor crossings, the proponent uses pipe culverts. Once the final details of the road and exact crossing points have been determined, the size of each culvert can be calculated.

Detailed design drawings, based on the above discussions, will be compiled in the next phase of the project.

### SWMP FOR PHOTOVOLTAIC (PV) PLANT

The PV Plant includes inter alia that the natural vegetation of the site should remain and that only the large trees/shrubs should be removed. Furthermore, that the PV panels will be mounted above the natural vegetation and therefore no bulk earthworks will be required.

As no bulk earthworks will be required, we believe that minimal stormwater measures will be required. Furthermore, the Mean Annual Precipitation (MAP) for this site is almost always lesser than the Mean Annual Evaporation (MAE) which further substantiates the minimal need for stormwater management with natural vegetation intact.

The proposed stormwater measures for the PV Plant includes the draining of each drainage area by means of suitably sized grass lined earth channels positioned in low-lying area where water naturally flows.

#### SWMP FOR SUBSTATION AND AUXILIARY BUILDINGS

The stormwater runoff from the substations and auxiliary building will be clean. It is recommended that at outlet point from downpipes, energy dissipation features be installed after which the stormwater can be discharged into the environment.

Monitoring and management are key to the success of a SWMP. The following are therefore included as a key aspect of SWMP.

- Frequent inspections until the success of the design and any unexpected problems are resolved/confirmed and maintenance frequency is determined;
- Review of the plan after a few years to improve, where possible, its practicality, costeffectiveness or efficacy;
- Alerts that do not rely on a full-time environmental management on site (which may not be feasible) including:
- Automatic alert system for the wastewater conservancy tank (e.g., a float driven switch alert system);

- Brief, annual refresher training on stormwater protection that should not take more than fifteen minutes for each staff member; and
- Well placed signs that remind staff members or reporting of incident/issues, as soon as possible and reduce the likelihood that forgetfulness or confusion will prevent reporting.

### 8.9 EROSION MANAGEMENT PLAN

In general, the main erosion risks on a wind turbine facility are channel outlets, roads, road crossings, foundation excavations and stockpiles. Erosion on roads is excluded as a risk as this is unlikely as long as the roads have no significant camber.

In the case of stockpiles and foundation excavations, diversion berms or silt fences are recommended to be placed on the upslope and downslope respectively. Topsoil that is cleared for the development of the turbine footprints and hardstand areas should be stockpiles for the decommissioning and rehabilitation of the facility. The stockpiles, if possible, should have gentle slopes of 1 in 5 or less to encourage revegetation and limit erosion. The stockpile should be bunded until it revegetates. The gently slopes will necessitate a stockpile with a larger surface area. This is considered the lower impact option as it limits erosion though it disturbs more surface area. Sometimes, material excavated during construction of the turbine foundations might be significant (cumulative volume). If that is the case, the material should be removed from and disposed of off-site responsibly (e.g., use cover material on landfill site).

Exposed and unprotected soils are the main cause of erosion in most situations. Therefore, this erosion management plan and the revegetation and rehabilitation plan are closely linked to one another and should not operate independently but should rather be seen as complementary activities within the broader environmental management of the site and should therefore be managed together. This Erosion Management Plan addresses the management and mitigation of potential impacts relating to soil erosion, including:

- Material stockpiled for long periods (2 weeks) must be retained in a bermed area.
- Stockpiles not used in three (3) months after stripping must be covered with hessian or a similar material to prevent dust and erosion.
- Sensitive areas need to be identified prior to construction so that the necessary precautions can be implemented.
- Any vegetation clearance must be phased to ensure that the minimum area of soil is exposed to potential erosion at any one time.
- Areas to be cleared must be clearly demarcated and this footprint strictly maintained.
- Silt fences and erosion control measures must be implemented in areas where these risks are more prevalent.
- Wind screening and stormwater control must be undertaken to prevent soil loss from the site.
- Other erosion control measures that can be implemented are as follows:
  - Brush packing with cleared vegetation
  - Mulch or chip packing
  - Planting of vegetation
  - Hydroseeding / hand sowing
- All erosion control mechanisms need to be regularly maintained.
- Seeding of topsoil and subsoil stockpiles to prevent wind and water erosion of soil surfaces.

- Re-vegetation of disturbed surfaces must occur immediately after construction activities are completed. This must be done through seeding with indigenous grasses.
- No impediment to the natural water flow other than approved erosion control works is permitted.
- To prevent stormwater damage, the increase in stormwater run-off resulting from construction activities must be estimated and the drainage system assessed accordingly.

### 8.9.1 MONITORING

The site must be monitored continuously during construction and operation in order to determine any indications of erosion. If any erosion features are recorded as a result of the activities on-site the Environmental Officer (during construction) or Site Manager (during operation) must:

- Assess the significance of the situation.
- Take photographs of the soil degradation.
- Determine the cause of the soil erosion.
- Inform the contractor/operator that rehabilitation must take place and that the contractor/operator is to implement a rehabilitation method statement and management plan.
- Monitor that the contractor/operator is taking action to stop the erosion and assist them where needed.
- Report and monitor the progress of the rehabilitation weekly and record all the findings in a site register.
- All actions with regards to the incidents must be reported on a monthly compliance report which will be submitted to the Competent Authority (during construction) and kept on file for consideration during the annual audits (during construction and operation).

The Contractor (in consultation with an appropriate specialist) must:

- Select a system/mechanism to treat the erosion.
- Design and implement the appropriate system/mechanism.
- Monitor the area to ensure that the system functions like it should. If the system fails, the method must be adapted or adjusted to ensure the accelerated erosion is controlled.
- Continue monitoring until the area has been stabilised.

### 8.10 TRAFFIC AND TRANSPORT MANAGEMENT PLAN

The purpose of a Traffic and Transportation Management Plan is to address regulatory compliance, traffic management practices, and protection measures to help reduce impacts related to transportation and the construction of temporary and long-term access within the vicinity of the project site. The objectives of this plan include the following:

- To ensure compliance with all legislation regulating traffic and transportation within South Africa National, Provincial, Local and associated guidelines.
- To avoid incidents and accidents while vehicles are being driven and while transporting personnel, materials, and equipment to and from the project site.
- To raise greater safety awareness in each driver and to ensure the compliance of all safe driving provisions for all the vehicles.
- To raise awareness to ensure drivers respect and follow traffic regulations.
- To avoid the deterioration of access roads and the pollution that can be created due to noise and emissions produced by equipment, machinery, and vehicles.

- All vehicles used during the transport of materials and in the construction activities are required to be roadworthy per the National Road Traffic Act (NRTA) and display all pertinent certificates as required.
- All vehicles travelling to and from the site shall adhere to all laws imposed by the law enforcement agencies, and shall comply with any requests made by the law enforcement officials.
- For each convoy of abnormal vehicles/loads a designated safety officer shall be nominated. All abnormal vehicles and loads to be transported are required to have a valid permit before any trip is begun.
- The route must be assessed to determine if any structures or vegetation need to be temporarily or permanently relocated so as to avoid damage to the load as well as public and private property during the trips.
- A designated transport coordination manager must be appointed to oversee and manage the traffic safety officers. Additionally, the designated transport coordination manager must inform and keep up-to-date the interested and affected parties of all the activities taking place that may have a direct impact on them.
- A traffic safety officer shall be nominated to make all the necessary arrangements to maintain the required traffic measures for the duration of the project as outlined in the "Standard Specifications for Road and Bridge Works for State Road Authorities,' 1998 edition. The safety officer shall liaise daily with the transportation coordination manager to keep them apprised of the state of all the traffic arrangements.
- All construction vehicles that are entering the site shall also be available via radio or telephone communication to the transport coordination manager. So that in the event of an emergency, all vehicles can be accounted for.
- All vehicles shall comply with the posted speed limits on public roads as well as the speed limits within the development. For additional speed limits that are imposed on the construction traffic, refer to the South African Road Traffic Signs Manual (SARTSM), Volume 2, June 1999 for the restrictions.
- All construction traffic shall comply with the legal load requirements as outlined in the National Road Traffic Act and National Road Traffic Regulations.
- Construction traffic entering the site along public roads must be limited to times when peak hour traffic can be avoided. The peak traffic occurs during 7h00 to 8h30, and 16h00 to 17h30.
- The South African Road Traffic Signs Manual (SARTSM), Volume 2, June 1999 is to be used for all traffic during the construction activities of the proposed project.
- During periods of high construction traffic entering and exiting the site, it is recommended that flagmen help direct the traffic. This will enable the safe movement of construction and public traffic at the entrance and reduce the number of potential conflicts.

### 8.11 FAUNA MANAGEMENT PLAN

The purpose of this fauna management plan is to protect species, habitats and eco-system services, ensuring no net reduction to any critically endangered / endangered species and no net loss of any critical habitats (as defined by IFC Performance Standard 6) whilst minimising disturbance to other species and habitats to the extent practicable. This plan provides a strategy to control potential impacts on fauna during the construction and operation of the Dalmanutha Hybrid Energy Facility.

### 8.11.1 MANAGING IMPACT ON FAUNA

#### SNAKE FIND AND HANDLING:

During construction, especially clearing of vegetation, it is likely that snakes will be encountered onsite. The following steps need to be undertaken in the event of a snake onsite:

- All work in that area is to cease;
- The site foreman/ site supervisor is to be notified;
- Snake handling will be undertaken by suitably trained and certified onsite personnel. The site supervisor or foreman needs to contact the relevant onsite personnel, who will safely remove and release the snake at a suitable habitat.

The following measures need to be communicated to all staff to ensure both human and snake safety:

- Under no circumstances may any site staff handle snakes without the proper snake handling training.
- All staff are to be provided with the correct Personal Protective Equipment (PPE) (e.g. snake gaiters and safety boots) to limit the potential for snake bites.
- Signage identifying the service provider appointed for snake handling must be erected around site. It is recommended that an individual onsite undergoes snake handling training to ensure that if an emergency arises it can be dealt with immediately.
- Intentional harming of snakes is prohibited onsite.

#### MAMMALS AND REPTILES

During the construction phase of the project the following mitigation measures need to be implemented and adhered to at all times to ensure that the impacts to fauna is managed and mitigated where possible.

#### WALK DOWN PRIOR TO CONSTRUCTION

Prior to the start of any construction or associated activities in areas of potential biodiversity concern, the Contractors will carry out a walk-though over the area accompanied by the ECO. The objective is to identify any sensitive habitats including potential for species of conservation interest (i.e. to consider the presence of any rare species of fauna, but establish possible risk of snake bites; inspect tree cavities for bats, etc.) that may be directly or indirectly affected by the proposed works.

Any important and significant habitats must be suitably demarcated and made a no-go area.

#### LIMIT THE DEVELOPMENT FOOTPRINT

- The development area must be clearly defined and marked off accordingly. All No- Go areas must be demarcated and warning signs prohibiting access erected.
- Areas to be cleared must be clearly marked in the field to eliminate unnecessary clearing/ disturbance.

#### LIMIT DISTURBANCE

- The extent of clearing and disturbance to the native vegetation must be kept to a minimum so that the impact on fauna and their habitats is restricted.
- Where roads pass right next to major water bodies provisions must be made for the fauna such as toads to pass under the roads by using culverts or something similar.

- Vehicles to adhere to speed limits at all times.
- The intentional harming and killing of animals will be prohibited through on-site supervision and worksite rules.
- Any litter onsite needs to be cleaned up immediately to prevent it being blown into the environment surrounding the development site.

#### **INSPECTIONS AND MONITORING**

- The following inspections and monitoring need to be undertaken during the construction phase:
- Observation of vegetation clearing activities by the Environmental Control Officer (ECO).
- Recording faunal fatalities to monitor success of relocation efforts.
- Regular monitoring of construction activities by the designated onsite personnel and the ECO.
- The ESHS team will collate details and investigate all Project-related wildlife complaints and incidents including instances of unauthorised hunting, poaching, bush trade, disturbance of breeding sites and injuries / fatalities. Corrective actions will be instigated where needed to avoid recurrence.

#### TRAINING

The contents of the Fauna Management Plan must be communicated to the staff through the induction training. On the job training can also be undertaken through the use of Environmental Toolbox Talks. All training must be undertaken as outlined in the relevant Training Procedures

Examples of Toolbox Talks include:

- Snakes bites
- Snake handling
- No-Go areas
- Encountering fauna onsite
- Poaching

### 8.12 AVIFAUNAL MANAGEMENT PLAN

The purpose of this avifaunal management plan is to provide mitigation and management measures onsite that to minimise the impacts on the priority bird species that potentially occur onsite. A number of the priority species are associated with the aquatic features on the site.

The following programme has therefore been developed to meet these needs. It is recommended that this programme be implemented by the wind farm if constructed. The findings from operational phase monitoring should inform an adaptive management programme to mitigate any impacts on avifauna to acceptable levels.

#### **During construction monitoring**

It will be necessary to monitor the breeding status and productivity of the nesting Grey Crowned Crane, and the status of roosting Cape Vultures (and their response to roost deterrence methods). This can be done by a number of short specialist visits to the site in the relevant seasons.

A site- specific construction management Plan (CEMP) must be implemented, which gives appropriate detailed description of how construction activities must be conducted. All contractors are to adhere to the CEMP and must apply good environmental practice during construction. This must be done by an Avifaunal Specialist.
- Providing adequate briefing for site personnel and, in particularly sensitive locations. Personnel
  must be adequately briefed on the need to restrict habitat destruction, and must be restricted to
  the actual building sites.
- Habitat destruction must be limited to what is absolutely necessary for the construction of the infrastructure, including the construction of new roads.
- During the construction phase, an avifaunal specialist must conduct surveys/exploration of the site. The aim will be to locate nest sites, so that these may continue to be monitored during the construction and operation phase.
- Measures to control noise and dust must be applied according to current best practice in the industry.
- Maximum use must be made of existing access roads and the construction of new roads must be kept to a minimum.
- Implementing an agreed post-development monitoring programme.
- Timing construction to avoid sensitive periods.

## **Operational phase monitoring**

The intention with operational phase bird monitoring is to repeat as closely as possible the methods and activities used to collect data pre-construction. This work will allow the assessment of the impacts of the proposed facility and the development of active and passive mitigation measures that can be implemented in the future where necessary. One very important additional component needs to be added, namely mortality estimates through carcass searches under turbines. The following programme has therefore been developed to meet these needs, and should start as soon as possible after the operation of the first phase of turbines (not later than 3 months):

Note that this framework is an interim draft. The most up-to-date version of the Best Practice Guidelines (Jenkins et al. 2015, update in prep) should inform the programme design at the time.

## Live bird monitoring

Note that due to the construction of the wind farm and particularly new roads it may be necessary to update the location of the below monitoring activities from those used pre-construction.

The walked transects of 1km each that have been done during pre-construction monitoring on the site should be continued.

The vehicle-based road count routes on the site should be continued, and conducted once on each Site Visit.

The Focal Sites on the site should be monitored. If any sensitive species are found breeding on site in future these nest sites should be defined as focal sites.

All other incidental sightings of priority species (and particularly those suggestive of breeding or important feeding or roosting sites or flight paths) within the broader study area should be carefully plotted and documented.

The Vantage Points already established on the overall site should be used to continue data collection post-construction. The exact positioning of these may need to be refined based on the presence of new turbines and roads. A total of 72 hours direct observation per Vantage Point should be conducted per year. The activities at the Control Site should be continued

## **Bird Fatality estimates**

This is now an accepted component of the post-construction monitoring program and the newest guidelines (Jenkins et al. 2015, update in prep) will be used to design the monitoring program. It is important that in addition to searching for carcasses under turbines, an estimate of the detection (the success rate that monitors achieve in finding carcasses) and scavenging rates (the rate at which carcasses are removed and hence not available for detection) is also obtained (Jenkins et al. 2015). Both of these aspects can be measured using a sample of carcasses of birds placed out in the field randomly. The rate at which these carcasses are detected and the rate at which they decay or are removed by scavengers should also be measured.

#### Fatality searches should be conducted as follows:

The area surrounding the base of turbines should be searched (up to a radius equal to 75% of the maximum height of turbine) for collision victims.

All turbines on the wind farm should be searched at least once a week (Monday to Friday).

Any suspected collision casualty should be comprehensively documented (for more detail see Jenkins et al. 2015).

A team of carcass searchers will need to be employed and these carcass searchers will work on site every day searching the turbines for mortalities.

It is also important that associated infrastructure such as power lines and wind masts be searched for collision victims according to similar methods.

The most up to date version of the Best Practice Guidelines (Jenkins et al. 2015) should inform the programme design at the time.

The above programme should be reported on, quarterly, to the wind farm operator, who should submit these reports to the DEA and BirdLife South Africa. These reports should include a comparison of actual measured fatality rates with those predicted by this study.

# 8.12.1 DESIGN MANAGEMENT PROCEDURES

- Ensure that key areas of conservation importance and sensitivity are avoided (as determined by the avifaunal specialist assessment).
- Where possible, installing transmission cables underground (subject to habitat sensitivities and in accordance with existing best practice guidelines for underground cable installation).
- Marking overhead cables using deflectors and where possible avoiding use over areas of high bird concentrations, especially for species vulnerable to collision

# 8.13 BAT MANAGEMENT PLAN

Addition to the mitigation of turbine placement (adhering to a bat sensitivity map), the available options to minimise bat mortalities are discussed in this section. Details on how each option must be implemented is explained in the step-by-step Mitigation Action Plan below.

# 8.13.1 MINIMISATION OF LIGHT POLLUTION AND ARTIFICIAL HABITAT CREATION

A mitigation to consider in the design of the Dalmanutha WEF is to keep artificial lighting to a minimum on the infrastructure (O&M buildings and on wind turbines), while still adhering to safety

and security requirements. For example, this can be achieved by having floodlights down-hooded, installing passive motion sensors onto lights around buildings and possibly utilising lights with lighting colours (also referred to as lighting temperatures) that attract fewer insects. Light pollution will impact bat feeding habits and species compositions negatively, by artificially discouraging photophobic (light averse) species and favouring species that readily forage around insect-attracting lights.

Stormwater management should also avoid creating artificial wetlands and open water sources in the turbine zones (less than 300m from any turbine base), as this will increase insect and bat activity around turbines.

The likelihood of bats being killed by moving turbine blades increases significantly when they are attracted to their proximity when it has become an improved foraging airspace due to the presence of artificial light or artificial water sources.

# 8.13.2 CURTAILMENT TO PREVENT FREEWHEELING

Freewheeling occurs when the turbine blades are rotating in wind speeds below the generator cut-in speed (also called the manufacturer's cut-in speed), thus no electricity is being produced and only some blade momentum is maintained.

Since bat activity tends to be negatively correlated with wind speed, it means that high numbers of bats are likely to be flying and impacted on in low wind speeds where freewheeling may occur. If turbine blades are feathered below the generator cut-in speed to prevent freewheeling, it can result in a very significant reduction of bat mortalities with minimal energy production loss.

# 8.13.3 CURTAILMENT THAT INCREASES THE CUT-IN SPEED

The activity levels of South African bats generally decrease in weather conditions with increased wind speeds. However, in scenarios where an unsustainable number of bats is being killed, and these bats fly in wind speeds above the turbine manufacturer's cut-in speed, the turbine's computer control system (referred to as the Supervisory Control and Data Acquisitions or SCADA system) can be programmed to a cut-in speed higher than the manufacturer's set speed. The new cut-in speed will then be referred to as the mitigation cut-in speed and can be determined from studying the relationship between long term (12-month) bat activity patterns on site and wind speed. This sustainable threshold of bat mortalities will be calculated according to the South African Bat Fatality Threshold Guidelines (MacEwan, et al., Edition 2, October 2018).

Turbines are curtailed in this manner by means of blade feathering, to render the blades motionless in wind speeds below the mitigation cut-in speed.

# 8.13.4 ACOUSTIC BAT DETERRENTS

This technology is developed well enough to be tested on site and may be recommended during operational monitoring, if mortality data indicate bat mortalities above the sustainable threshold for the wind farm. This threshold will be calculated according to the South African Bat Fatality Threshold Guidelines (MacEwan, et al., Edition 2, October 2018). Initial experiments with this technology on wind farms in South Africa are yielding promising results that may indicate the effectiveness of the devices in the correct scenarios.

Current data on the South African trials is still limited to a small sample set, and the technology will not necessarily be effective in all mitigation scenarios and for all bat species. Therefore, it should be

considered and tested on a case-by-case basis if possible, and it is highly recommended that adequate monitoring continues concurrently, to assess the effectiveness of the devices in reducing bat mortalities.

# 8.13.5 MITIGATION ACTION PLAN

## Step 1: Minimisation of light pollution and artificial habitat creation

During the planning phase for the Dalmanutha WEF it must become mandatory to only use lights with low sensitivity motion sensors that switch off automatically when no persons are nearby, to prevent the creation of regular insect gathering pools, where practically possible without compromising security requirements. This applies to the turbine bases (if applicable) and other infrastructure/buildings. Aviation lights should remain as required by aviation regulations. Floodlights should be down-hooded and where possible, lights with a colour (lighting temperature) that attract less insects should be used. This mitigation step is a simple and cost-effective strategy to effectively decrease the chances of bat mortality on site.

Bi-annual visits to the facility at night must be conducted for the operational lifetime of the facility by operational staff of the facility, to assess the lighting setup and whether the passive motion sensors are functioning correctly. The bat specialist conducting the operational bat mortality monitoring must conduct at least one visit to site during night-time to assess the placement and setup of outside lights on the facility. When lights are replaced and maintenance on lights is conducted, this Mitigation Action Plan must be consulted.

The storm water drainage plan must avoid creations of artificial ponds/open water sources or wetlands in turbine zones (less than 300m from any turbine base), as these will increase insect activity and therefore bat activity in the area. This can result in turbines that were previously assessed as having a low risk to be financially and biologically costly high-risk turbines.

## Step 2: Operational bat mortality monitoring

As soon as the Dalmanutha WEF facility becomes operational, a bat mortality monitoring should be conducted for a minimum of 2 years. The methodology of this monitoring must comply with the South African Good Practice Guidelines for Operational Monitoring for Bats at Wind Energy Facilities - 2nd Edition June 2020 (Aronson et al. 2020), or any newer version of the applicable guidelines that may be in force at the start of operation of the facility.

The results of the bat mortality study may be used to develop mitigation measures focused on specific problematic turbines. The results of the operational monitoring must be made available, on request, to other bat specialists conducting operational and preconstruction monitoring on WEF's in South Africa.

Only once bat carcass and acoustic data collected during operational monitoring indicates acceptable fatalities rates can these suggested mitigation measures be relaxed, if appropriate.

## Step 3: Curtailment to prevent freewheeling

For the lifetime of the facility, curtailment must be applied to all turbines by ninety-degree feathering of blades below the manufacturer's cut-in speed, so it is exactly parallel to the wind direction and minimises freewheeling blade rotation as much as possible without locking the blades. The time-period of the year for this blade feathering is determined from the 12 months bat activity data as October to January and can be limited to specific times of higher bat activity (i.e. 18:00 - 21:00).

This can significantly lower probability of bat mortalities. Influence on productivity is minimal since no power is generated below the manufacture's cut-in speed.

## Step 4: Additional mitigation by curtailment or acoustic deterrents

If mitigation steps 1 - 3 are followed, and the bat mortality monitoring study detects bat mortalities that are above the sustainable threshold for the Dalmanutha WEF, then additional mitigation will need to be implemented to bring bat mortalities to or below the sustainable threshold.

Adaptive mitigation is preferred, as fatalities can be prevented, but this requires rapid dissemination of the number of carcasses detected so that on-the-fly mitigation can occur.

The time-period of the year for this blade feathering is determined from the 12 months bat activity data as October to January and can be limited to specific times of higher bat activity (i.e. 18:00 - 21:00).

The bat specialist conducting the operational bat monitoring may recommend other time periods for additional mitigation, based on robust mortality data. If required, the bat specialist may make use of climatic data to allow for an active and adaptable mitigation schedule.

## Step 5: Auditing of bat mortalities for the lifetime of the facility

During the implementation of mitigation Steps 1 - 4, it is crucial for the facility to determine and monitor bat mortalities in order to implement, maintain and adapt mitigations as efficiently as possible. For the duration of the lifetime of the facility, the impacts on bats must be audited/monitored by reliable methods of carcass searching and/or electronic devices capable of automatically counting bat mortalities. Such auditing should occur every 5 years (after the end of the initial 2-year operational study) for all turbines on site, and continuously for turbines where mitigations discussed in Step 4 are implemented.

# 8.14 SOIL MANAGEMENT PLAN

Some of the most significant impacts on soil properties occur as a result of activities associated with construction. Construction activity can have adverse impacts on soil in a number of ways by:

- Covering soil with impermeable materials, effectively sealing it and resulting in significant detrimental impacts on soils' physical, chemical and biological properties, including drainage characteristics.
- Contaminating soil as a result of accidental spillage or the use of chemicals.
- Over-compacting soil through the use of heavy machinery or the storage of construction materials.
- Reducing soil quality, for example by mixing topsoil with subsoil.
- Wasting soil by mixing it with construction waste or contaminated materials, which then have to be treated before reuse or even disposed of at landfill as a last resort.

Careful management of topsoil and subsoil is an important aspect of sustainable use of materials that are being stripped. Without a proper Soil Resource Plan there is the risk of losing, damaging or contaminating valuable soil resources. The purpose of this Soil Management Plan is to outline principles for soil management to ensure the integrity of the resource during and post-construction. This plan must be read together with the Emergency Response Plan in order to minimise the risk of contamination of soils.

# 8.14.1 PRINCIPLES FOR SOIL MANAGEMENT

## THE CORRECT HANDLING OF TOPSOIL

- Before beginning work on site, topsoil must be stripped from all areas that will be disturbed by construction activities. Appropriate equipment must be used and appropriate work practices must be implemented for soil stripping as mishandling soil can have an adverse effect on its properties.
- Topsoil must be stripped in the driest condition possible.
- Topsoil must be retained on site in order to be used in site rehabilitation. The correct handling of the topsoil layer is in most cases the key to rehabilitation success.
- It is important that the correct depth of topsoil is excavated in order to ensure good plant growth. If excavation is too shallow, then an important growth medium for new seedlings could be lost. If excavation is too deep, this could lead to the dilution of the seed and nutrient rich topsoil with deeper sterile soil.
- Topsoil and subsoil layers must never be mixed. The mixture of topsoil with the deeper sterile soil hinders the germination of seeds which are buried too deep in the soil layer. Mixture of soil layers also leads to the dilution of nutrient levels which are at highest concentration within the topsoil, resulting in lower levels of nutrients available for new seedlings.
- To enable soil to be reused on site at a later stage, it needs to be stored in temporary stockpiles to minimise any damage or loss of function. Stockpiles must not be higher than 2m. Alternatively, topsoil berms can be created on the site boundaries. There are a number of important considerations when creating stockpiles including soil erosion, pollution to watercourses and the risk of flooding. These will be affected by the size, height and method of forming stockpiles, and how they are protected and maintained.
- Topsoil must be stored separately from other soil in heaps until construction in an area is complete.
- The duration of topsoil storage must be minimised as far as possible. Storing topsoil for long periods leads to seed bank depletion following germination during storage, and anoxic conditions develop inside large stockpile heaps.
- All stockpiles must be positioned away from drainage lines.
- Sediment fencing must be erected downslope of all stockpiles to intercept any sediment and upslope runoff must be diverted away from stockpiles.

# STRIPPING OF SUBSOIL

- The following protocols must be followed when stripping subsoil:
- On many sites subsoil will not need to be stripped but merely protected from damage. However, on other sites it might need to be temporarily removed. Where subsoil is required to be stripped, this must be undertaken before commencement of construction from all areas that are to be disturbed by construction activities or driven over by vehicles.
- Subsoil stripping depths depend on the correct identification of the sub-soil types on an ad-hoc basis, where no formal survey data exists.
- Subsoil must be stripped in the driest condition possible.
- To enable soil to be reused on site at a later stage, it needs to be stored in temporary stockpiles to minimise any damage or loss of function. There are a number of important considerations when creating stockpiles including soil erosion, pollution to watercourses and the risk of flooding. These will be affected by the size, height and method of forming stockpiles, and how they are protected and maintained.

- All stockpiles must be positioned away from drainage lines.
- Sediment fencing must be erected downslope of all stockpiles to intercept any sediment and upslope runoff must be diverted away from stockpiles.

# 8.15 HERITAGE AND PALAEONTOLOGICAL MANAGEMENT PLAN

The purpose of this document is to provide a response guideline should archaeological sites, palaeontological sites or graves become exposed during ground altering activities within the Dalmanutha Hybrid Energy Facility area. Heritage resources are protected in terms of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

# 8.15.1 CHANCE FIND PROCEDURE

The following procedural guidelines must be considered in the event that previously unknown heritage resources are exposed or found during the construction of the Dalmanutha Hybrid Energy Facility area. This chance find procedure (CFP) must be read in conjunction with the Environmental Authorisation, the Environmental Management Programme, Final EIAr and the final layout archaeological ground-truthing report.

The Contractor or other person discovering a potentially significant site or artefact will initiate the following actions:

- Once alerted to fossil occurrence(s): alert site foreman, stop work in area immediately, safeguard site with security tape / fence / sand bags if necessary.
- Record key data while fossil remains are still in situ:
  - Accurate geographic location describe and mark on site map / 1: 50 000 map / satellite image / aerial photo
  - Context describe position of fossils within stratigraphy (rock layering), depth below surface
  - Photograph fossil(s) in situ with scale, from different angles, including images showing context (e.g. rock layering)
- If feasible to leave fossils in situ:
  - Alert Heritage Resources Agency and project palaeontologist (if any) who will advise on any necessary mitigation
  - Ensure fossil site remains safeguarded until clearance is given by the Heritage Resources Agency for work to resume
- If not feasible to leave fossils in situ (emergency procedure only):
  - Carefully remove fossils, as far as possible still enclosed within the original sedimentary matrix (e.g. entire block of fossiliferous rock)
  - Photograph fossils against a plain, level background, with scale
  - Carefully wrap fossils in several layers of newspaper / tissue paper / plastic bags
  - Safeguard fossils together with locality and collection data (including collector and date) in a box in a safe place for examination by a palaeontologist
  - Alert Heritage Resources Agency and project palaeontologist (if any) who will advise on any necessary mitigation
- If required by Heritage Resources Agency, ensure that a suitably-qualified specialist palaeontologist is appointed as soon as possible by the developer.

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- Implement any further mitigation measures proposed by the palaeontologist and Heritage Resources Agency;
- The Specialist Palaeontologist must undertake the following:
  - Apply for Fossil Collection Permit Record / submit Work Plan to relevant Heritage Resources Agency.
  - Describe and judiciously sample fossil remains together with relevant contextual data (stratigraphy / sedimentology / taphonomy).
  - Ensure that fossils are curated in an approved repository (e.g. museum / university / Council for Geoscience collection) together with full collection data.
  - Submit Palaeontological Mitigation report to Heritage Resources Agency.
  - Adhere to best international practice for palaeontological fieldwork and Heritage Resources Agency minimum standards.

# 8.15.2 TRAINING, INSPECTION AND MONITORING

Since it is not practical to have a regular monitoring presence over the construction period by either an archaeologist or palaeontologist, environmental awareness training must be conducted by the EO for all contractors and subcontractors. The training must include, as a minimum, the following:

- Identifying potential features of heritage significance;
- Procedures for dealing with heritage resources discovered on site;
- Applicable Legislation pertaining to the protection of heritage resources; and
- The importance of protecting heritage resources.
- The contents of the Heritage Management Plan must be communicated to the staff through the induction training. On the job training can also be undertaken through the use of Environmental Toolbox Talks.

# 8.16 GRIEVANCE MECHANISM

# 8.16.1 GRIEVANCE MECHANISM - EXTERNAL

A grievance mechanism is a tool used to address affected communities' concerns and complaints and is an important pillar of the stakeholder engagement process, since it creates opportunities for companies and communities to identify problems and discover solutions together. The Project proponent can benefit from understanding community concerns and complaints and addressing them through all stages of project development.

Where it is anticipated that a new project will involve ongoing risk and adverse impacts on surrounding communities, the project proponent is required to establish a grievance mechanism to receive and facilitate resolution of the affected communities' concerns and complaints about the proponent's environmental and social performance. The grievance mechanism should be scaled to risks and adverse impacts of the project, address concerns promptly, use an understandable and transparent process that is culturally appropriate and readily accessible to all segments of the affected communities, and do so at no cost to communities and without retribution. The mechanism should not impede access to judicial and administrative remedies.

This Grievance Mechanism has been developed to receive and facilitate grievances and provide a solution to these concerns and grievances. The aim of the grievance mechanism is to ensure that

grievances or concerns raised by local landowners, staff and or communities are addressed in a manner that:

- Provides accessible avenues for all internal and external stakeholders to contact management of the facility;
- Provides a predictable, transparent, and credible process to all parties, resulting in outcomes that are seen as fair, effective, lasting and dealt with in a timely manner;
- Builds trust as an integral component of staff and broader community relations activities; and
- Enables more systematic identification of issues and trends affecting a project, facilitating corrective action and pre-emptive engagement.

The aim of this Grievance Mechanism is to address grievances in a manner that does not require a potentially costly and time-consuming legal process. This grievance mechanism also ensures alignment with local and international best practices in human resources development and stakeholder engagement.

# OBJECTIVES

The objectives of the grievance mechanism include:

- To be respectful of complainant culture, values, traditions and views;
- To resolve grievances at the local level and in a timely manner;
- To identify the root causes of grievances and address systemic issues;
- To provide a process that is dialogue based, with the complainant and the Proponent cooperating in the investigation, discussion, resolution and announcement of the grievance and result;
- To ensure fair, equitable and consistent outcomes to resolve grievances;
- To enhance and continuously improve the ability of the Proponent to fairly address community concerns.

# SCOPE AND RESPONSIBLE PARTIES

A grievance mechanism is primarily for the community to raise relevant concerns about the Project / Proponent's activities and is to be implemented throughout the life cycle of the Project (i.e. throughout assessment, construction, and implementation phases).

WSP will only be involved in the stakeholder engagement and grievance management process for the assessment phase. The Project proponent and the Contractor will be responsible for implementation of the grievance mechanism throughout the construction phase.

# **GRIEVANCE REDRESS PROCEDURE**

This grievance mechanism sets out the following steps to be taken to resolve grievances.

- Register grievance
  - 1. A grievance can be submitted in a written letter, e-mail, fax, or raised verbally in person or via telephone.
  - 2. Grievances raised during the assessment process are to be submitted to the EAP via the details provided as per the stakeholder engagement notifications. The EAP will notify the Proponent of the grievance.

- 3. Grievances raised during the implementation process are to be submitted to the Proponent / Contractor via the relevant details, which are to be made available to registered stakeholders prior to commencement of onsite activities, as well as via site notice boards.
- 4. In the event that a complaint is raised verbally, the responsible person must obtain the approval of the complainant as to the documented complaint (by way of signature of the Receipt of Grievance Form). Should the complainant have literacy issues, the responsible person may request that a third party (friend / relative of complainant) is available to verify / approve the contents of the documented complaint to the satisfaction of the complainant.
- 5. The submission should include the nature of the grievance, the date when it occurred and the name and contact details of the complainant.
- 6. Grievances will be accepted anonymously or through a third party (e.g. unions, NGOs, local authorities, community representatives, etc.).
- 7. Individuals have the right to request that their name be kept confidential throughout the grievance process.
- 8. As men and women may communicate their grievances differently, and also have different types of grievances, the complainant may request that their grievance is processed by a female / male representative. In the event that such a request is made, the Proponent, as far as reasonably practicable, will accommodate this request.

## • Within a Week (7 days) of receiving the grievance the Proponent will:

- 1. Enter the grievance into the Proponent's records that track grievances;
- 2. Assess the grievance according to specific criteria and if necessary, develop an appropriate approach for the particular grievance;
- 3. Provide a written acknowledgement of the grievance including the name of the responsible person to contact about progress, an explanation of the steps that will be taken to investigate, discuss and resolve the grievance, and an anticipated timetable for processing the grievance.

## Processing the Grievance:

The responsible person will:

- 1. Identify the parties involved;
- 2. Clarify issues and concerns raised by the grievance through direct dialogue;
- 3. Classify the grievance in terms of seriousness according to the gravity of the allegation, the potential impact on an individual's or a group's welfare and safety, or the public profile of the issue;
- 4. Convene a staff group with expertise relative to the grievance;
- 5. Determine the method for resolving the grievance the most common approaches, not excluding others, will be:
  - The Proponent proposes a solution;
  - The Proponent and aggrieved party decide together the solution;
  - The Proponent and aggrieved party defer to a third party for mediation / arbitration.

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- 6. Gather views of other stakeholders, including those of the Proponent and if necessary, an agreed neutral technical opinion;
- 7. Determine initial options that parties have considered and explore various approaches for settlement;
- 8. Conduct the process as agreed;
- 9. Close the grievances by signing the Complaint Close-Out Form (i.e. that the grievance has been resolved satisfactory to both parties).
- 10. The Proponent may "close" the grievance even if the complainant is not satisfied with the outcome. This option can be pursued by the Proponent in the case that the complainant is unable to substantiate a grievance, or if there is an obvious speculative or fraudulent attempt. In such situations, the Proponent's efforts to investigate the grievance and to arrive at a conclusion will be well documented and the complainant advised of the situation. The Proponent (or contractors working for the Proponent) will not dismiss grievances based on a cursory review and close them in their grievance record unless the complainant has been notified and had the opportunity to provide supplementary information / evidence;
- 11. Keep a record that tracks the progress and communications for each grievance.

## Processing Timeline

1. The Proponent will aim to bring the grievance to a resolution within 30 days of receiving the grievance. The grievance shall be acknowledged within 7 days by the responsible person, and responded to within 30 days. If the matter takes longer than 30 days to resolve, the complainant will be informed through dialogue and in writing, of the reason for the delay, any advances or difficulties encountered and the anticipated new resolution date.

## RECOURSE

If the complainant is not satisfied with the outcome of the grievance process the aggrieved party has the right to address the grievance via the judicial system.

# MANAGING, TRACKING, RECORDING GRIEVANCES - INTERNALLY

In terms of managing grievances the Proponent will:

- Appoint a senior manager to oversee the Grievance Mechanism. Another member of staff will be appointed to carry out the day-to-day work in this area and involve specialist staff and external parties, where required, who may need to be consulted to resolve a grievance.
- Maintain a register of grievances. All activities, including registration of the grievance and the progress through to outcome will be recorded.
- Ensure that grievances and resolutions are communicated internally to all staff through monthly reports.
- Launch the Grievance Mechanism and regularly remind communities that it is available to use.

Contractors are expected to follow this Grievance Procedure. Contractor shall be proactive and available to participate in the grievance resolution processes. Contractor participation is intended to allow for specific contractor grievances to be addressed efficiently.

Contractors shall ensure that all individual contractor employees are aware of the Grievance Procedure.

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Contractors will receive any grievance from an individual or community and notify the Proponent thereof immediately.

Contractors shall not make any direct agreements or resolution with local communities without prior coordination of such actions with the Proponent.

The Contractor's community relations team (or equivalent) will attend all coordination meetings requested by the Proponent, as required. The contractor community relations management (or equivalent) will report to the Proponent's management team on a regular basis – in regards to social incidents and community relations issues. The Proponent, or their representative, will conduct regular audits on contractors to ascertain compliance with this Grievance Procedure.

# 8.16.2 GRIEVANCE MECHANISM - INTERNAL

The Proponent will establish a Grievance Mechanism that will set out the process for workers to communicate their grievances. The grievance mechanism will be available to workers of the Proponent, Contractors and subcontractors.

A Code of Conduct will set out practice measures that the construction workers will have to adhere to, to ensure a positive relationship is built and maintained with the landowners and local communities.

# 8.17 HIV/AIDS MANAGEMENT PLAN

The HIV/AIDS management plan will be compiled in the event that the project is identified as a preferred bidder as part of the REIPPPP (or a suitable private off-take agreement is concluded).

The measures must be implemented on site during the construction and operational phases:

- Promote a non-discriminatory and supportive environment for people affected by HIV & AIDS.
- HIV-positive employees must be protected against unfair discrimination, victimisation or harassment.
- Sensitive issues surround HIV & AIDS and it is important to handle matters in a discreet and private manner
- Promote awareness and education programmes to inform employees about HIV & AIDS which will enable them to protect themselves and others against infection by HIV.
- Involve employees and their representatives in the planning and implementation of awareness and counselling programmes, especially as peer educators and counsellors.

# 9 CONCLUSION

Dalmanutha Wind (Pty) Ltd is proposing the development of the proposed Dalmanutha Hybrid Energy Facility (up to 300MW)

The proposed project will be applied for under a Special Purpose Vehicle (SPV), and the Project Applicant is therefore Dalmanutha Wind (Pty) Ltd. The Dalmanutha Hybrid Energy Facility is located approximately 7km southeast of the Belfast town within Emakhazeni Local Municipality, Mpumalanga Province. Site access is via the N4, which is approximately 220 meters from the proposed development area. Dalmanutha Hybrid Energy Facility will be located over eighteen farm portions.

The EIAr process considered the biophysical location of the proposed development, as well as a feasibility assessment by the proponent, which inter alia served to identify site options that would be optimal for energy production and grid interconnection. The purpose of the proposed Dalmanutha Hybrid Energy Facility is to contribute to the national energy targets of diversification of energy supply and the promotion of clean energy. The project will also aid in overcoming the power shortages that are currently faced in the country. Other socio-economic benefits would result from the proposed project, including the increase of energy supply, employment opportunities and local economic development.

It is therefore the opinion of the EAP that provided this project is mitigated, as per the mitigation and management measures outlined in this EMPr, the project will result in impacts that should not negatively affect the environment. It is the applicant's responsibility to ensure that this EMPr is made binding on the contractor by including the EMPr in the contract documentation. The contractor must thoroughly familiarise himself with the requirements of the EMPr and appoint an EO to oversee the implementation of the EMPr on a day-to-day basis. In addition, the applicant must appoint an external ECO to undertake monthly compliance audits during construction against the requirements of the EMPr as well as the EA.

Parties responsible for transgression of this EMPr must be held responsible for any corrective actions that may need to be undertaken. Parties responsible for environmental degradation through irresponsible behaviour/negligence must receive penalties.

WSP is of the opinion that the project can proceed, provided that the outlined mitigation measures of the EIA process and this EMPr are implemented effectively.

In terms of NEMA, everyone (i.e. all persons engaging in any component of this project) is required to take reasonable measures to ensure that they do not pollute the environment. 'Reasonable measures' includes informing and educating employees about the environmental risks associated with their work and training them to operate in an environmentally responsible manner.

The Proponent also recognises that, in terms of NEMA, the cost to repair any environmental damage will be borne by the person responsible for the damage. Should the above-mentioned environmental guidelines and mitigation measures be adopted, it is anticipated that the negative environmental impacts of the proposed Facility will be mitigated adequately. The Proponent and the selected Contractor shall appoint relevant personnel, as well as an independent ECO, to monitor the site periodically throughout construction to ensure that the required environmental controls are in place and working effectively. During operation and maintenance, the area specific Environmental

Manager and EO, with the support of the maintenance supervisor, will monitor environmental controls.

# **Appendix A**

EAP CV

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# ASHLEA STRONG, MEM, EAP

Principal Consultant (Planning & Advisory Services), Environment & Energy



Years with the firm 8 Years of experience 18 **Professional gualifications** EAPASA Areas of expertise Auditing ESIR Energy Environmental Control Infrastructure Mining Training Waste Management

#### CAREER SUMMARY

Ashlea is a Principal Consultant with 18 years' experience in the environmental field. She currently provides technical and strategic expertise on a diverse range projects in the environmental management field, including environmental scoping and impact assessment studies, environmental management plans, waste and water management, as well as the provision of environmental management solutions and mitigation measures

Ashlea has been involved in the management of a number of large EIAs specifically within the energy sector such as the Medupi Power Station, and Pebble-Bed Modular Reactor (PBMR) and numerous Transmission Powerlines. She also has significant environmental auditing experience and expertise having undertaken over 70 compliance audits.

Ashlea holds a Masters in Environmental Management; a BTech (Nature Conservation), and a National Diploma (Nature Conservation). She is also a Registered Environmental Assessment Practitioner.

#### **EDUCATION**

Masters in Environmental Management, University of the Free State, South Africa	2006
B Tech, Nature Conservation, Technikon SA, South Africa	2001
National Diploma in Nature Conservation, Technikon SA, South Africa	1999
ADDITIONAL TRAINING	

Conduct outcomes based assessment (NQF Level 5), South 2009 African Qualifications Authority (SAQA)

#### PROFESSIONAL MEMBERSHIPS

Registered Environmental Assessment Practitioner (Registration 2020 Number: 2019/1005)

#### PROFESSIONAL EXPERIENCE

#### **Energy Sector**

- 100MW Solar Photovoltatic (PV) Plant (2021). Project Director. This project involved the compilation of a Basic Assessment and Environmental Management Plan for a 100MW Solar PV Plant near Springs in Gauteng, South Africa. Client: Calodex (Pty) Ltd.
- Erica 400kV Loop-in-Loop-out (LILO) Powerline (2020). Compilation of an environmental screening assessment for the Erica 400kV LILO Powerline in Cape Town, Western Cape, South Africa. Client: Eskom Holdings SOC Limited.
- Maralla East and West Wind Energy Facilities (2019). Project Manager. Compilation of two Part 2 Amendment Process for the changes in technical scope of the Wind Energy Facilities near Sutherland in the Northern and Western Cape, South Africa. Client: BioTherm Energies (Pty) Ltd.
- Ruigtevallei 132kV Powerline (2019): Project Manager. Compilation of a Part 2 Amendment Process for the deviation of the Ruigtevallei - Dreunberg 132 kV powerline near Gariep in the Free State, South Africa. Client: Eskom Holdings SOC Limited.

Principal Consultant (Environmental Services), Environment & Energy

- Nakonde and Mpika Wind Energy Projects (2018): Project Manager. Compilation
  of two Environmental Project Briefs for the establishment of meteorological masts
  at the Proposed Nakonde and Mpika Wind Project Sites in Zambia. Client:
  Globeleq
- Rietkloof Wind Energy Facility Project (2018): Project Director. Compilation of a Basic Assessment and Environmental Management Programme for a 140MW Wind Energy Facility, Matjiesfontein, Western Cape. Client: G7 Renewable Energies
- Mozambique Zambia Interconnector Powerline (2018): Project Manager. This project involved the compilation of the Environmental and Social Impact Assessment and Environmental and Social Management Plan for a 300km 400kV powerline between Tete, in Mozambique, and Chipata, in Zambia. Client: Southern African Power Pool (SAPP).
- Ankerlig Koeberg 132kV powerline walkdown (2017): Project Manager. This
  project involved the compilation of a Construction and Operation Environmental
  Management Plans for the Ankerlig Koeberg 132kV powerline. Client: Eskom
  Holdings SOC Limited.
- Gwanda 100MW Solar Project (2018): Project Manager. This project involved the high-level review of the Environmental Impact Assessment for a 100MW Photovoltaic (PV) Solar Project near the town of Gwanda, Matebeleland South Province of Zimbabwe against relevant legislation and international standards. Client: WSP | Parsons Brinckerhoff.
- Southern Energy Coal Fired Power Station (2016): Project Manager. This project involved the high-level review of the Environmental Impact Assessment for the Southern Energy Coal Fired Power Station near Hwange in Zimbabwe against relevant legislation and standards. Client: WSP | Parsons Brinckerhoff.
- Proposed Solar and Wind Projects located in the Northern and Western Cape Provinces (2015) Project Manager. This project involved the compilation of 15 Environmental Impact Assessments and Environmental Management Plans for 2 Solar and 2 Wind energy Projects near Aggenys and Sutherland respectively. Client: BioTherm Energy (Pty) Ltd.
- Proposed Solar Park, Northern Cape Province, South Africa (2012): Strategic Environmental Advisor. This project involved the provision of process expertise for the compilation of an Environmental Impact Assessment and Environmental Management Plan for the proposed Solar Park in the Northern Cape Province. Client: Central Energy Fund (CEF).
- Proposed Tabor Nzhelele 400kV Transmission Lines and associated infrastructure, Limpopo Province, South Africa (2012): Project Manager. This project involved the compilation of an Environmental Impact Assessment and Environmental Management Plan for a 100km 400kV powerline between Louis Trichardt and Musina in the Limpopo Province. Client: Eskom Transmission.
- Retrofitting of the existing Electrostatic Precipitators with Fabric Filter Plants at Units 2, 3 and 4 at the Grootvlei Power Station, South Africa (2012): Project Manager. This project involved the compilation of a Basic Assessment Report and Environmental Management Plan for the proposed retrofitting of the existing Electrostatic Precepitators with Fabric Filter Plants at the Grootvlei Power Station. Client: Eskom Holdings SOC Limited.
- Proposed Mulilo Coal Fired Power Station and associated infrastructure as well as associated power lines and substations, Musina, Limpopo, South Africa (2008): Project Manager. This project involved the compilation of an Environmental Impact Assessment and Environmental Management Plan for the proposed Mulilo Coal Fired Power Station and associated infrastructure as well as associated power lines and substations in the Musina area of the Limpopo Province. Client: Parsons Brinkerhoff Africa and Mulilo Power.

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- Pebble Bed Modular Reactor Demonstration Plant and Associated Infrastructure, Western Cape, South Africa (2008): Project Manager. This project involved the compilation of an Environmental Impact Assessment and Environmental Management Plan for the proposed Pebble Bed Modular Reactor Demonstration Plant and Associated Infrastructure in the Western Cape Province. Client: Eskom Generation.
- Proposed Bantamsklip Kappa 765 kV Transmission Lines and associated infrastructure, Western and Northern Cape, South Africa (2008): Project Manager. This project involved the compilation of an Environmental Impact Assessment and Environmental Management Plan for four 260km 765kV powerlines between the Bantamsklip Nuclear Power Station Site and the proposed new Kappa Substation in the Karoo, Western Cape Province. Client: Eskom Transmissions.
- Proposed Bantamsklip Bacchus, Bacchus Kappa and Bacchus Muldersvlei 400 kV Transmission Lines and associated infrastructure, Western and Northern Cape, South Africa (2008): Project Manager. This project involved the compilation of an Environmental Impact Assessment and Environmental Management Plan for a number of 400kV powerlines between the Bantamsklip Nuclear Power Station Site and a number of substations, including Bacchus, Kappa and Muldersvlei, in the Western Cape Province. Client: Eskom Transmission.
- Westgate Tarlton Kromdraai 132 kV Sub-Transmission line and associated infrastructure, Gauteng, South Africa (2008): Project Manager. This project involved the compilation of an Environmental Impact Assessment and Environmental Management Plan for the Westgate – Tarlton – Kromdraai 132 kV Sub-Transmission line and associated infrastructure in the Gauteng Province. Client: Eskom Distribution – Central region.
- Environmental Scoping Study for the proposed new distribution line and substation for Eskom, Dundonald, Mpumalanga (also involved in the Public Participation Process), Mpumalanaga, South Africa (2008): Project Manager. This project involved the compilation of an Environmental Impact Assessment and Environmental Management Plan for a 132kV powerline as well as a new substation in the Tarlton area of Gauteng.
- The proposed new 132 kV sub-transmission line between the Dinaledi and GaRankuwa substations for Eskom, GaRankuwa, North West, South Africa (2008): Project Manager. This project involved the compilation of an Environmental Impact Assessment and Environmental Management Plan for a 132kV powerline between the Dinaledi and GaRankuwa substations in the GaRankuwa area of the North West Province. Client: Eskom Distribution.
- Expansion of the Transmission powerline network and associated infrastructure between the Perseus substation and the Beta substation, Free State, South Africa (2008): Project Manager. This project involved the compilation of an alignment specific construction Environmental Management Plan for the 13km 765kV Perseus Beta Turn-ins. Eskom Transmission
- Tarlton Kromdraai 132 kV Sub-Transmission line and associated infrastructure, Gauteng, South Africa (2008): Project Manager. This project involved the compilation of an Environmental Impact Assessment and Environmental Management Plan for a 132kV powerline as well as a new substation in the Tarlton area of Gauteng. Client: Eskom Distribution – Central Region.
- Basic Assessment for the proposed Watershed Mmabatho 88kV Power line. North West, South Africa (2008): Project Manager. This project involved the compilation of a Basic Assessment and Environmental Management Plan for a new 88kV powerline near Mmabatho in the North West Province. Client: Eskom Distribution – Central Region.

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- Proposed Watershed Mmabatho 88kV Power line. North West, South Africa (2007): Project Manager. This project involved the compilation of an Environmental Impact Assessment and Environmental Management Plan for the Watershed Mmabatho 88kV Power line in the North West Province. Client: Eskom Distribution Central Region.
- Proposed Combined Cycle Gas Turbine Plant and Associated Infrastructure near Majuba, Mpumalanga, South Africa (2007): Project Manager. This project involved the compilation of an Environmental Impact Assessment and Environmental Management Plan for the proposed Combined Cycle Gas Turbine Plant and Associated Infrastructure near Majuba in the Mpumalanga Province. Client: Eskom Holdings SOC Limited.
- Proposed Capacity Increase of the Atlantis OCGT Plant and Associated Infrastructure, Western Cape, South Africa (2006): Project Manager. This project involved the compilation of an Environmental Impact Assessment and Environmental Management Plan for the proposed Capacity Increase of the Atlantis OCGT Plant and Associated Infrastructure in the Western Cape Province. Client: Eskom Generation.
- Proposed Concentrated Solar Thermal Plant in the Northern Cape, South Africa (2006): Project Manager. This project involved the compilation of an Environmental Impact Assessment and Environmental Management Plan for the proposed Concentrated Solar Thermal Plant near Upington in the Northern Cape Province. Client: Eskom Holdings SOC Limited.
- Proposed Underground Coal Gasification plant, Eskom, Mpumalanga, South Africa (2006): Project Manager. This project involved the compilation of an Environmental Impact Assessment and Environmental Management Plan for the proposed Underground Coal Gasification plant near the Majuba Power Station in the Mpumalanga Province. Client: Eskom Holdings SOC Limited.
- Proposed new Coal-fired Power Station in the Lephalale Area for Eskom, Limpopo, South Africa (2005): Project Manager. This project involved the compilation of an Environmental Impact Assessment and Environmental Management Plan for the proposed new Coal-fired Power Station in the Lephalale Area in the Limpopo Province. Client: Eskom Generation.
- Proposed Open Cycle. Gas Turbine Power Station at Atlantis for Eskom, Western Cape, South Africa (2005): Environmental Consultant. This project involved the compilation of an Environmental Impact Assessment and Environmental Management Plan for the proposed Open Cycle. Gas Turbine Power Station at Atlantis in the Western Cape Province. Client: Eskom Generation.

Infrastructure Sector

- Emalahleni Water Treatment Plant Amendment Project (EWRP) (2020). Project Manager. Compilation of a Part 1 Amendment Process for the changes to the EWRP Environmental Authorisation as well as an update of the Environmental Management Programme for the EWRP near Emalahleni in Mpumalanga, South Africa. Client: Anglo American
- Hendrina Leachate Dam (2018): Project Manager. This project involves the compilation of a Basic Assessment and Environmental Management Plan for a leachate Dam at the Domestic Waste Landfill Site at the Hendrina Power Station. Client: Eskom Holdings SOC Limited.
- Rehabilitation of the R34 between Vryburg and Schweizer-Reneke, North West, South Africa (2016): Project Manager. This project involved the compilation of a Basic Assessment and Environmental Management Plan for the upgrading of the R34 between Vryburg and Schweizer-Reneke. Client: SANRAL
- Proposed Expansion of the Cremation Facilities at the Envirocin Pet Crematorium, Gauteng, South Africa (2013): Project Manager. This project involves the compilation of a basic assessment for the expansion of the cremation facilities at

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the Evnirocin Pet Crematorium in Kyasands, Gauteng Province. Client: Envirocin Incineration Systems CC.

- Proposed Kraft Paper Mill in Frankfort, Frankfort, Free State, South Africa (2013): Project Manager. This project involved the undertaking of an Environmental Impact Assessment, including the compilation of an Environmental Management Programme, for the proposed establishment of a KRAFT paper mill in Frankfort in the Free State Province. Client: Industrial Development Corporation of SA (Pty) Ltd.
- Rehabilitation of the N14 between Delerayville and Sannieshof, North West, South Africa (2011): Project Manager. This project involved the compilation of a Basic Assessment and Environmental Management Plan for the upgrading of the N14 between Sannieshof and Delerayville as well as the construction of a new bridge over the Hartsriver. This project also included the compilation of Water Use License and Mining Permit Applications. Client: SANRAL.
- Proposed new Waterfall Cemetery, Limpopo, South Africa (2011): Project Manager. This project involved the compilation of a Basic Assessment and Environmental Management Plan for the new Waterfall Cemetery, Limpopo Province. Client: Makhado Municipality.
- Route determination of the proposed Metro Boulevard, Gauteng, South Africa (2008): Project Manager. This project involved the undertaking of an Environmental Impact Assessment for the route determination of the proposed Metro Boulevard in the Weltevreden Park Area of the Gauteng Province. Client: Johannesburg Roads Agency.
- Proposed new fuel supply pipeline between Milnerton and Atlantis, Western Cape, South Africa (2007): Project Manager. This project involved undertaking an Environmental Impact Assessment for the proposed new fuel supply pipeline between Milnerton and Atlantis to supply the Ankerlig Power Station in the Western Cape Province. Client: Eskom Generation.

#### Mining Sector

- Establishment of the Proposed Rietvlei Opencast Coal Mine, Mpumalanga, South Africa (2013): Project Manager. This project involves the undertaking of an integrated environmental authorisation process, including an Environmental Impact Assessment, Environmental Management Programme Report, Waste Management License Application and Water Use License Application, for the establishment of an opencast coal mine north of Middelburg. Client: Rietvlei Mining Company.
- Decommissioning of Redundant Infrastructure at the Vaal River Operations, North West and Free State, South Africa (2013): Project Manager. This project involves undertaking an integrated Environmental Authorisation and Waste Management License process for the proposed decommissioning of redundant infrastructure at AngloGold Ashanti's Vaal River Operations. Client: AngloGold Ashanti.
- Decommissioning of Redundant Infrastructure at the West Wits Operations, Gauteng, South Africa (2013): Project Manager. This project involves undertaking a Basic Assessment process for the proposed decommissioning of redundant infrastructure at AngloGold Ashanti's West Wits Operations. Client: AngloGold Ashanti (Pty) Ltd.
- Inyanda Mine Pegasus South Expansion, Mpumalanga, South Africa (2011): Project Manager. This project included the compilation of an Environmental Impact Assessment, Environmental Management Plan, the Amendment of the existing Environmental Management Programme Report and the amendment of the existing Water Use License for the Inyanda Mine Pegasus South Expansion project, north of Middelburg in the Mpumalanga Province. Client: Exxaro Coal (Pty) Ltd.

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- Sishen Infrastructure Program, Northern Cape, South Africa (2010): Project Manager. This project involved the compilation of an Environmental Impact Assessment and an Environmental Management Plan for the infrastructure expansion programme proposed by the Sishen Mine in the Northern Cape. Client: Sishen Iron Ore (Pty) Ltd.
- Prospecting Permit Applications in the Kuruman area of the Northern Cape, South Africa (2011): Project Manager. This project involved the compilation of Environmental Management plans as part of six applications for Prospecting Permits in the Kuruman area of the Northern Cape. Client: Sound Mining Solutions.
- Borrow pits required by the Limpopo Department of Roads and Transport, Limpopo, South Africa (2010): Project Manager. This project involved the compilation of Environmental Management plans as part of the applications for Mining Permits for borrow pits required for the rehabilitation of provincial roads in the Limpopo Province. Client: Limpopo Department of Roads and Transport.
- Borrow pits required for the Medupi Coal Fired Power Station, Limpopo, South Africa (2008): Project Manager. This project involved the compilation of Environmental Management plans as part of the applications for Mining Permits for borrow pits required for the Medupi Coal Fired Power Station in the Limpopo Province. Client: Eskom Generation.
- Borrow pits required for the Ingula Pumped Storage Scheme, KwaZulu-Natal, South Africa (2008): Project Manager. This project involved the compilation of Environmental Management plans as part of the applications for Mining Permits for borrow pits required for the Ingula Pumped Storage Scheme in the Kwa-Zulu Natal Province. Client: Eskom Generation.
- Project Manager, Mining Right Application for a 23 Hectare Borrow Pit required for the Steelpoort Pumped Storage Scheme, Mpumalanga, South Africa (2007): Project Manager. This project entailed the compilation of the required Environmental Management Programme Report in support of a Mining Right Application for a 23 Hectare Borrow Pit required for the Steelpoort Pumped Storage Scheme in the Mpumalanga Province. Client: Eskom Generation.
- Renewed Mining and Prospecting Activities on the farm Quaggaskop 215, Vanrhynsdorp, Western Cape, South Africa (2004): Environmental Consultant. This project involved the compilation of an Environmental Management Programme Report for the recommencement of mining and prospecting activities on the farm Quaggaskop 215 outside Vanrhynsdorp in Western Cape Province. Client: Minexpo.

Waste Management Projects

- Sasol Waste Management Environmental Management Programme (2019). Compilation of an operational Environmental Management Programme for the Sasol Waste Ash Facility, Charlie 1 Disposal Facility and the Waste Recycling Facility. Client: Sasol Secunda Operations.
- Proposed continuous Ashing at Majuba Power Station, Mpumalanga, South Africa (2012): Project Manager. This project entailed the compilation Environmental Impact Assessment and Waste Management License Application for the proposed continuous ashing project at the Majuba Power Station in Mpumalanga. Client: Eskom Holdings SOC Limited.
- Proposed continuous Ashing at Tutuka Power Station, Mpumalanga, South Africa (2012): Project Manager. This project entailed the compilation Environmental Impact Assessment and Waste Management License Application for the proposed continuous ashing project at the Tutuka Power Station in Mpumalanga. Client: Eskom Holdings SOC Limited.
- Proposed extension of Ash Dams at Hendrina Power Station, Mpumalanga, South Africa (2011): Project Manager. This project entailed the compilation

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Environmental Impact Assessment and Waste Management License Application for the proposed extension of the ash dams at the Hendrina Power Station in Mpumalanga. Client: Hendrina Power Station.

 Phase 1 of the Environmental Impact Assessment for the Proposed Regional General and Hazardous Waste Processing Facility, Eastern Cape (2005). Project Manager. This project entailed the compilation Environmental Impact Assessment for the Proposed Regional General and Hazardous Waste Processing Facility in the Eastern Cape. Client: Coega Development Corporation.

#### Specialist Projects

- Strategic Environmental Assessment for the Development. Master Plan Greater Port Harcourt, Rivers State, Nigeria, Africa (2008): Senior Environmental Consultant. This project entailed the compilation of a Strategic Environmental Assessment for the City of Port Harcourt as part of the development of the Master Plan for the Greater Port Harcourt Area. Client: Port Harcourt Government
- Development of an Environmental Policy, Gauteng, South Africa (2006): Environmental Consultant. This project entailed the development and compilation of an environmental policy for the Ekurhuleni Metropolitan Municipality. Client: Ekurhuleni Metropolitan Municipality.
- Environmental Input into the National Transport Master Plan, South Africa (2007): Environmental Consultant. This project included the provision of strategic environmental input in to the Draft National Transport Plan. Client: Department of Transport.
- Development of the Development Corridors, Ekurhuleni, Gauteng, South Africa (2006): Environmental Consultant. This project included the provision of strategic environmental input in to the Ekurhuleni Metropolitan Municipalities Development Corridor Study. Client: Ekurhuleni Metropolitan Municipality.

#### Auditing

- Compliance Audits at South 32 (2016 2020): Project Manager. This project involved the environmental compliance audits of the Water Use Licenses for the BMK, Douglas, Klipfontein and Middelburg Mine North and South Sections at South 32 in Mpumalanga. Client: South 32.
- Compliance Audits at Middelburg Water Reclamation Plant (MWRP) (2016 2020): Project Manager. This project involved the environmental compliance audits of the Water Use License and Waste Management License for the MWRP at South 32 in Mpumalanga. Client: South 32.
- BioTherm Round 4 Lenders Technical Advisor (2018 2021). Project Manager
   Environmental. Environmental monitoring of the construction of the Konkoonsies II and Aggeneys Photovoltaic Solar Plants against the IFC Performance Standards. Client: Nedbank.
- Water Use Licence Audits (2019): Lead Auditor: External compliance audits of the water use licences for the Delmas and Argent Powerlines in Mpumalanga. Client: Eskom Holdings SOC Limited.
- Sasol Alrode and Pretoria West Depot Audits (2016 2020): Lead Auditor. Environmental compliance audits for environmental authorisations and environmental management plans for the Sasol Alrode and Pretoria West Depots. Client: Sasol Oil (Pty) Ltd
- Sasol Regulation 34 Audits (2019): Lead Auditor. Environmental compliance audits for 13 authorisations for the Sasol Owned Petrol Filling Stations. Client: Sasol Oil (Pty) Ltd
- Regulation 34 Audits at Mogalakwena Mine (2019). Project Manager.
   Environmental compliance audits of the EMPR and various environmental

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authorisations at the Mogalakwena Mine in the Limpopo Province. Client: Anglo American Platinum.

- Sasol Environmental Authorisations and Environmental Management Plans for the Secunda Operations (2019): Lead Auditor. Environmental compliance audits for 49 authorisations for the Sasol Secunda. Client: Sasol Secunda Operations
- Waste Management Licence Compliance Audit and PCB Plan Close Out Audit, Phalaborwa, Limpopo, South Africa (2019): Project Manager. Environmental compliance audit of a WML and the PCB Plan for the Palabora Mine. Client: Palabora Company
- Sasol Mining Water Use Licence Compliance, South Africa (2018): Project Manager. Environmental compliance audit of six WULs held by mining operations in Secunda. Client: Sasol Mining
- Waste Management License Audits for the Sasol Waste Ash Site, Secunda, Mpumalanga, South Africa (2014 - 2019): Lead Auditor. These projects involve the annual and biannual environmental compliance auditing of the Waste Management licenses for various waste facilities at the Secunda Site in Mpumalanga Province. Client: Sasol Chemical Industries: Secunda Synfuels Operations
- Legal Assessment at South 32 (2019): Project Manager and Lead Auditor. This
  project involved the assessment of legal compliance against the mine's legal
  register for the Klipfontein and Middelburg Mine North and South Sections at
  South 32 in Mpumalanga. Client: South 32
- InvestChem Annual Environmental Compliance Monitoring, Kempton Park, Gauteng, South Africa (2013 - 2019): Lead Auditor. This project involved the annual environmental compliance auditing for InvestChem's Sulphonation Plant in Kempton Park, Gauteng Province. The monitoring included InvestChem's compliance to various commitments contained in their environmental management programmes and conditions within their environmental authorisations (records of decision). Client: Investchem (Pty) Ltd.
- Compliance Audits at Sasol Alrode and Pretoria West Depots (2015-2019).
   Project Manager and Lead Auditor. Annual Environmental compliance auditing of the Environmental authorisations at the Alrode and Pretoria West Depots in Gauteng. Client: Sasol Oil (Pty) Ltd
- Water Use Licence for the Letabo Power Station (2018): Project Manager. Environmental compliance audit of the WUL held by Eskom Letabo Power Station, Free State, South Africa. Client: Eskom Holdings
- Compliance Audits at Kriel Colliery (2018): Project Manager. This project involved the environmental compliance audits of the Water Use Licenses held by Kriel Colliery in Mpumalanga. Client: Seriti Coal
- Legal Assessment at South 32 (2017): Project Manager and Lead Auditor. This
  project involved the assessment of legal compliance against the mine's legal
  register for the BMK, Douglas, Klipfontein and Middelburg Mine North and
  South Sections at South 32 in Mpumalanga. Client: South 32
- EMPR Performance Assessment Report at South 32 (2016): Project Manager. This project involved the formal assessment and verification of the Environmental Management Programme Report for the BMK, Douglas, Klipfontein and Middelburg Mine North and South Sections at South 32 in Mpumalanga. Client: South 32
- Compliance Audit for the Bokpoort Concentrating Solar Power (CSP) Facility, Groblershoop, Northern Cape, South Africa (2016): Lead Auditor. This project involved the environmental compliance auditing of the Waste Management License, Environmental Authorisation and Water Use License for the Bokpoort

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CSP Facility near Groblershoop in the Northern Cape Province. Client: ACWA Power Solafrica Bokpoort CSP Power Plant (Pty) Ltd.

- EMPR Performance Assessment Report for the Landau Colliery, Mpumalanga, South Africa (2013): Auditor. This project involved the formal assessment and verification of the Landau Colliery Environmental Management Programme Report, conducted in accordance with Regulation 55 of the Mineral and Petroleum Resources Development Act (No. 28 of 2002). Client: Anglo Thermal Coal.
- Waste Management License Audit for the Slagment Operation, Vanderbijlpark, Gauteng, South Africa (2013): Lead Auditor. This project involved the annual environmental compliance auditing for AfriSam's Slagment Operation in Vanderbijlpark in Gauteng Province. The audit included AfriSam's compliance to the conditions of their waste management license. Client: AfriSam Southern Africa (Pty) Ltd.
- EMPR Performance Assessment Report for the New Vaal Colliery, Free State, South Africa (2006-2007): Auditor. This project involved the formal assessment and verification of the New Vaal Colliery Environmental Management Programme Report, conducted in accordance with Regulation 55 of the Mineral and Petroleum Resources Development Act (No. 28 of 2002). Client: Anglo American Thermal Coal.

#### Environmental Control Projects

- N14 rehabilitation between Sannieshof and Delareyville, North West, South Africa (2012): Environmental Control Officer. This project involved the monthly auditing of the contractor's compliance with the conditions of the approved Environmental Management Plan as well as ad hoc environmental advise to the Project Engineer and SANRAL. Client: SANRAL.
- Delmas and Bontleng Waste Water Treatment Works, Mpumalanga, South Africa (2009): Environmental Control Officer. This project involved a once off compliance audit of the above-mentioned Waste Water Treatment Works. Client: Victor Khanye Municipality.
- Nkonjaneni Water Borne Sewer Project in Piet Retief, Mpumalanga, South Africa (2009): Environmental Control Officer. This project involved the monthly auditing of the contractor's compliance with the conditions of the approved Environmental Management Plan as well as ad hoc environmental advise to the Project Engineer. Client: Mkhondo Local Municipality.
- Upgrading of the Waterval Water Care Works, Gauteng, South Africa (2005-2007): Environmental Control Officer. This project involved the monthly auditing of the contractor's compliance with the conditions of the approved Environmental Management Plan. Client: ERWAT.
- Lotus Gardens Ext 2 Township establishment, Gauteng, South Africa (2003): Environmental Control Officer. This project involved the monthly auditing of the contractor's compliance with the conditions of the approved Environmental Management Plan. Client: City of Tshwane.

#### Training

- N14 rehabilitation between Sannieshof and Delareyville, North West, South Africa (2012): Project Manager. This project involved the provision of training for the staff of the N14 rehabilitation project with regards to the contents of the environmental management plan. Client: SANRAL.
- Training in Environmental Aspects and Rehabilitation for the Small Scale Mining Division of Mintek, City, Province, South Africa (2004): Trainer. This project involved the provision of environmental awareness training for delegates involved in the small scale miner training programme run by the Mintek small scale mining division. Client: Mintek

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 Training in Environmental Aspects and Impacts, Germiston, Gauteng, South Africa (2004): Trainer. This project involved the provision of environmental aspects and impacts training for the staff of Transwerk in Germiston. Client: Transwerk Germiston.

# **Appendix B**

EAP DECLARATION OF INTEREST AND OATH UNDERTAKING

11



environmental affairs

**REPUBLIC OF SOUTH AFRICA** 

DETAILS OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER, DECLARATION OF INTEREST AND UNDERTAKING UNDER OATH

File Reference Number: NEAS Reference Number: Date Received:

Department: Environmental Affairs

(For official use only)

DEA/EIA/

Application for authorisation in terms of the National Environmental Management Act, Act No. 107 of 1998, as amended and the Environmental Impact Assessment (EIA) Regulations, 2014, as amended (the Regulations)

#### PROJECT TITLE

Dalmanutha Wind Energy Facility (WEF) and associated infrastructure, near Belfast Mpumalanga

#### Kindly note the following:

- 1. This form must always be used for applications that must be subjected to Basic Assessment or Scoping & Environmental Impact Reporting where this Department is the Competent Authority.
- This form is current as of 01 September 2018. It is the responsibility of the Applicant / Environmental Assessment Practitioner (EAP) to ascertain whether subsequent versions of the form have been published or produced by the Competent Authority. The latest available Departmental templates are available at https://www.environment.gov.za/documents/forms.
- 3. A copy of this form containing original signatures must be appended to all Draft and Final Reports submitted to the department for consideration.
- 4. All documentation delivered to the physical address contained in this form must be delivered during the official Departmental Officer Hours which is visible on the Departmental gate.
- 5. All EIA related documents (includes application forms, reports or any EIA related submissions) that are faxed; emailed; delivered to Security or placed in the Departmental Tender Box will not be accepted, only hardcopy submissions are accepted.

#### **Departmental Details**

Postal address: Department of Environmental Affairs Attention: Chief Director: Integrated Environmental Authorisations Private Bag X447 Pretoria 0001

#### Physical address:

Department of Environmental Affairs Attention: Chief Director: Integrated Environmental Authorisations Environment House 473 Steve Biko Road Arcadia

Queries must be directed to the Directorate: Coordination, Strategic Planning and Support at: Email: EIAAdmin@environment.gov.za

#### ENVIRONMENTAL ASSESSMENT PRACTITIONER (EAP) INFORMATION

EAP Company Name:	WSP Group Africa (Pty) Ltd	VSP Group Africa (Pty) Ltd				
B-BBEE	Contribution level (indicate 1 to 8 or non-compliant)	Level 1	Percentag Procurem	e 135 <sup>o</sup> ent	%	
			recognitio	n		
EAP name:	Ashlea Strong					
EAP Qualifications:	Masters in Environmental Management, University of the Free State					
	B Tech, Nature Conservation, Technikon SA					
	National Diploma in Nature Conservation, Technikon SA					
Professional	EAPASA (2019/1005)					
affiliation/registration:						
Physical address:	Building 1, Golder House, Maxwell Office Park, Magwa Crescent West, Waterfall City, Midrand South Africa					
Postal address:	PO Box 98867 Sloane Park					
Postal code:	2152	Cell:				
Telephone:	+27 11 361 1392	Fax:		+27 11 361 1381		
E-mail:	Ashlea.Strong@wsp.com					

The appointed EAP must meet the requirements of Regulation 13 of GN R982 of 04 December 2014, as amended.

#### 1. DECLARATION BY THE EAP

I, \_\_\_\_Ashlea Strong\_\_\_\_\_, declare that -\_\_\_

- I act as the independent environmental assessment practitioner in this application;
- I have expertise in conducting environmental impact assessments, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- I will take into account, to the extent possible, the matters listed in Regulation 13 of the Regulations when preparing the application and any report relating to the application;
- I undertake to disclose to the applicant and the Competent Authority all material information in my possession that
  reasonably has or may have the potential of influencing any decision to be taken with respect to the application by
  the Competent Authority; and the objectivity of any report, plan or document to be prepared by myself for
  submission to the Competent Authority, unless access to that information is protected by law, in which case it will be
  indicated that such information exists and will be provided to the Competent Authority;
- I will perform all obligations as expected from an environmental assessment practitioner in terms of the Regulations; and
- I am aware of what constitutes an offence in terms of Regulation 48 and that a person convicted of an offence in terms of Regulation 48(1) is liable to the penalties as contemplated in Section 49B of the Act.

#### Disclosure of Vested Interest (delete whichever is not applicable)

- I do not have and will not have any vested interest (either business, financial, personal or other) in the proposed activity proceeding other than remuneration for work performed in terms of the Regulations;
- I have a vested interest in the proposed activity proceeding, such vested interest being:

Signature of the Environmental Assessment Practitioner

## WSP Group Africa (Pty) Ltd

Name of Company:

#### OT December 2022

Date

# 2. UNDERTAKING UNDER OATH/ AFFIRMATION

I, \_\_\_\_Ashlea Strong\_\_\_\_\_, swear under oath / affirm that all the information submitted or to be submitted for the purposes of this application is true and correct.

Signature of the Environmental Assessment Practitioner

WSP Group Africa (Pty) Ltd

Name of Company

#### C7 December 2022

Date

SOUTH AFRICAN POLICE SERVICE CLIENT SERVICE CENTRE

<del>2022 -12- 07</del>

DOUGLASDALE

SOUTH AFRICAN POLICE SERVICE

Signature of the Commissioner of Oaths

2022-12-07

Date

Details of EAP, Declaration and Undertaking Under Oath

# **Appendix C**

MAPS

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- Bat Site Buffer
- **(† Burial Sites**
- **Burial Buffer**
- Heritage Sites
- Noise Receptors •
- Homestead 500m Buffer
- 🔜 Avifaunal No-Go
- **Open Water**
- Open Water 200m Buffer
- Streams 200m Buffer
- Delineated Wetlands
- Wetlands Delineated 100m Buffer
- N Road 1km & R Road 500m Buffer

# **Ecological Importance Rating**

- **Very Low**
- 🔀 Low
- **Medium**
- High
- Wery High
- **Soil Sensitivity**
- No-Go Area
- High
- Low
- Mpumalanga Biodiversity Sector Plan (2019)
  - CBA Irreplaceable
  - **CBA** Optimal



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KEY MAP Limpopo

Mpumalanga

# **Appendix D**

# **SUBSTATION GENERIC EMPR**

11

# GENERIC ENVIRONMENTAL MANAGEMENT PROGRAMME (EMPr) FOR THE DEVELOPMENT AND EXPANSION OF SUBSTATION INFRASTRUCTURE FOR THE TRANSMISSION AND DISTRIBUTION OF ELECTRICITY





environmental affairs Department: Environmental Affairs REPUBLIC OF SOUTH AFRICA

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#### INTRODUCTION

#### 1. Background

The National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) requires that an environmental management programme (EMPr) be submitted where an environmental impact assessment (EIA) has been identified as the environmental instrument to be utilised as the basis for a decision on an application for environmental authorisation (EA). The content of an EMPr must either contain the information set out in Appendix 4 of the Environmental Impact Assessment Regulations, 2014, as amended (EIA Regulations) or must be a generic EMPr relevant to an application as identified and gazetted by the Minister in a government notice. Once the Minister has identified, through a government notice that a generic EMPr is relevant to an application for EA, that generic EMPr must be applied by all parties involved in the EA process, including but not limited to the applicant and the competent authority (CA).

#### 2. Purpose

This document constitutes a generic EMPr relevant to applications for the development or expansion of substation infrastructure for the transmission and distribution of electricity, and all listed and specified activities necessary for the realisation of such infrastructure.

#### 3. Objective

The objective of this generic EMPr is to prescribe and pre-approve generally accepted impact management outcomes and impact management actions, which can commonly and repeatedly be used for the avoidance, management and mitigation of impacts and risks associated with the development or expansion of substation infrastructure for the transmission and distribution of electricity. The use of a generic EMPr is intended to reduce the need to prepare and review individual EMPrs for applications of a similar nature.

#### 4. Scope

The scope of this generic EMPr applies to the development or expansion of substation infrastructure for the transmission and distribution of electricity requiring EA in terms of NEMA. This generic EMPr applies to activities requiring EA, mainly activity 11 and 47 of the Environmental Impact Assessment Regulations Listing Notice 1 of 2014, as amended, and activity 9 of the Environmental Impact Assessment Regulations Listing Notice 2 of 2014, as amended, and all associated listed or specified activities necessary for the realization of such infrastructure.

#### 5. Structure of this document

Part	Section	Heading		Content				
А		Provides	general	Definitions,	acronyms,	roles	&	responsibilities
		guidance and information		and documentation and reporting.		ng.		

This document is structured in three parts with an Appendix as indicated in the table below:

**1** | Page

Appendix E: Generic EMPr Development of substation infrastructure – Dalmanutha Energy facility Substation

Part	Section	Heading	Content
		and is <b>not legally binding</b>	
В	1	Pre-approved generic EMPr template	Contains generally accepted impact management outcomes and impact management actions required for the avoidance, management and mitigation of impacts and risks associated with the development or expansion of substation infrastructure for the transmission and distribution of electricity, which are presented in the form of a template that has been pre- approved.
			The template in this section is to be completed by the contractor, with each completed page signed and dated by the holder of the EA prior to commencement of the activity.
			Where an impact management outcome is not relevant, the words "not applicable" can be inserted in the template under the "responsible persons" column.
			Once completed and signed, the template represents the EMPr for the activity approved by the CA and is legally binding. The template <b>is not required</b> to be submitted to the CA as once the generic EMPr is gazetted for implementation, it has been approved by the CA.
			To allow interested and affected parties access to the pre-approved EMPr template for consideration through the decision-making process, the EAP on behalf of the applicant /proponent must make the hard copy of this EMPr available at a public location and where the applicant has a website, the EMPr should also be made available on such publicly accessible website.
	2	Site specific information	Contains preliminary infrastructure layout and a declaration that the applicant/holder of the EA will comply with the pre-approved generic EMPr template contained in <u>Part B: Section 1</u> , and understands that the impact management outcomes and impact management actions are <b>legally binding</b> . The preliminary infrastructure layout must be

Part	Section	Heading	Content
			finalized to inform the final EMPr that is to be submitted with the basic assessment report (BAR) or environmental impact assessment report (EIAR), ensuring that all impact management outcomes and impact management actions have been either pre- approved or approved in terms of <u>Part C</u> .
			This section <b>must be</b> submitted to the CA together with the final BAR or EIAR. The information submitted to the CA will be considered to be incomplete should a signed copy of <u>Part B: section 2</u> not be submitted. Once approved, this Section forms part of the EMPr for the development and is legally binding.
C		Site specific sensitivities/ attributes	If any specific environmental sensitivities/ attributes are present on the site which require site specific impact management outcomes and impact management actions, not included in the pre-approved generic EMPr, to manage impacts, these specific impact management outcomes and impact management actions must be included in this section. These specific environmental attributes must be referenced spatially and impact management outcomes and impact management actions must be provided. These specific impact management outcomes and impact management actions must be presented in the format of the pre-approved EMPr template (Part B: section 1) This section will not be required should the site contain no specific environmental sensitivities or attributes. However, if <u>Part C</u> is applicable to the site, it <b>is required</b> to be submitted together with the BAR or EIAR, for consideration of, and decision on, the application for EA. The information in this section must be prepared by an EAP and must contain his/her name and expertise including a curriculum vitae. Once approved, Part C forms part of the EMPr for the site and is legally binding. This section applies only <b>to additional</b> impact management outcomes and impact

Part	Section	Heading	Content
			management actions that are necessary for
			the avoidance, management and mitigation
			of impacts and risks associated with the
			specific development or expansion and which
			are not already included in Part B: section 1.
Appe	endix 1		Contains the method statements to be
			prepared prior to commencement of the
			activity. The method statements are <b>not</b>
			required to be submitted to the competent
			authority.

# 6. Completion of part B: section 1: the pre-approved generic EMPr template

The template is to be completed prior to commencement of the activity, by providing the following information for each environmental impact management action:

- For implementation
  - a 'responsible person',
  - a method for implementation,
  - a timeframe for implementation
- For monitoring
  - a responsible person
  - frequency
  - evidence of compliance.

The completed template must be signed and dated by the holder of the EA prior to commencement of the activity. The method statements prepared and agreed to by the holder of the EA must be appended to the template as <u>Appendix 1</u>. Each method statement must be signed and dated on each page by the holder of the EA. This template once signed and dated is legally binding. The holder of the EA will remain responsible for its implementation.

# 7. Amendments of the impact management outcomes and impact management actions

Once the activity has commenced, a holder of an EA may make amendments to the impact management outcomes and impact management actions in the following manner:

- Amendment of the impact management outcomes: in line with the process contemplated in Regulation 37 of the EIA Regulations; and
- Amendment of the impact management actions: in line with the process contemplated in Regulation 36 of the EIA Regulations.

# 8. Documents to be submitted as part of part B: section 2 site specific information and declaration

<u>Part B: Section 2</u> has three distinct sub-sections. The first and third sub-sections are in a template format. Sub-section two requires a map to be produced.

<u>Sub-section 1</u> contains the project name, the applicant's name and contact details, the site information, which includes coordinates of the property or farm in which the proposed substation infrastructure is proposed as well as the 21-digit Surveyor General code of each cadastral land parcel and, where available, the farm name.

<u>Sub-section 2</u> is to be prepared by an EAP and must contain his/her name and expertise including a curriculum vitae. This sub-section must include a map of the site sensitivity overlaid with the preliminary infrastructure layout using the national web based environmental screening tool, when available for compulsory use at: <u>https://screening.environment.gov.za/screeningtool.</u> The sensitivity map shall identify the nature of each sensitive feature e.g. threatened plant species, archaeological site, etc. Sensitivity maps shall identify features both within the planned working area and any known sensitive features and within 50 m from the development footprint.

<u>Sub-section 3</u> is the declaration that the applicant (s)/proponent (s) or holder of the EA in the case of a change of ownership must complete which confirms that the applicant/EA holder will comply with the pre-approved 'generic EMPr' template in <u>Section 1</u> and understands that the impact management outcomes and impact management actions are legally binding.

# (a) Amendments to Part B: Section 2 – site specific information and declaration

Should the EA be transferred, <u>Part B: Section 2</u> must be completed by the new applicant/proponent and submitted with the application for an amendment of the EA in terms of regulations 29 or 31 of the EIA Regulations, whichever applies. The information submitted as part of such an application for an amendment to an EA will be considered to be incomplete should a signed copy of <u>Part B: Section 2</u> not be submitted. Once approved, <u>Part B: Section 2</u> forms part of the EMPr for the development and the EMPr becomes legally binding to the new EA holder.

# PART A – GENERAL INFORMATION

#### 1. **DEFINITIONS**

In this EMPr any word or expression to which a meaning has been assigned in the NEMA or EIA Regulations has that meaning, and unless the context requires otherwise –

"clearing" means the clearing and removal of vegetation, whether partially or in whole, including trees and shrubs, as specified;

"construction camp" is the area designated for key construction infrastructure and services, including but not limited to offices, overnight vehicle parking areas, stores, the workshop, stockpile and lay down areas, hazardous storage areas (including fuels), the batching plant (if one is located at the construction camp), designated access routes, equipment cleaning areas and the placement of staff accommodation, cooking and ablution facilities, waste and wastewater management;

"contractor" - The Contractor has overall responsibility for ensuring that all work, activities, and actions linked to the delivery of the contract, are in line with the Environmental Management Programme and that Method Statements are implemented as described.

"hazardous substance" is a substance governed by the Hazardous Substances Act, 1973 (Act No. 15 of 1973) as well as the Hazardous Chemical and Substances Regulations, 1995;

"method statement" means a written submission by the Contractor to the Project Manager in response to this EMPr or a request by the Project Manager and ECO. The method statement must set out the equipment, materials, labour and method(s) the Contractor proposes using to carry out an activity identified by the Project Manager when requesting the Method Statement. This must be done in such detail that the Project Manager and ECO is able to assess whether the Contractor's proposal is in accordance with this specification and/or will produce results in accordance with this specification;

The method statement must cover as a minimum applicable details with regard to:

- (i) Construction procedures;
- (ii) Plant, materials and equipment to be used;
- (iii) Transporting the equipment to and from site;
- (iv) How the plant/ material/ equipment will be moved while on site;
- (v) How and where the plant/ material/ equipment will be stored;
- (vi) The containment (or action to be taken if containment is not possible) of leaks or spills of any liquid or material that may occur;
- (vii) Timing and location of activities;
- (viii) Compliance/ non-compliance; and
- (ix) Any other information deemed necessary by the Project Manager.

"slope" means the inclination of a surface expressed as one unit of rise or fall for so many horizontal units;

"solid waste" means all solid waste, including construction debris, hazardous waste, excess cement/ concrete, wrapping materials, timber, cans, drums, wire, nails, food and domestic waste (e.g. plastic packets and wrappers);

**"spoil**" means excavated material which is unsuitable for use as material in the construction works or is material which is surplus to the requirements of the construction works;

**"topsoil"** means a varying depth (up to 300 mm) of the soil profile irrespective of the fertility, appearance, structure, agricultural potential, fertility and composition of the soil;

"works" means the works to be executed in terms of the Contract

#### 2. ACRONYMS and ABBREVIATIONS

CA	Competent Authority
cEO	Contractors Environmental Officer
dEO	Developer Environmental Officer
DPM	Developer Project Manager
DSS	Developer Site Supervisor
EAR	Environmental Audit Report
ECA	Environmental Conservation Act No. 73 of 1989
ECO	Environmental Control Officer
EA	Environmental Authorisation
EIA	Environmental Impact Assessment
ERAP	Emergency Response Action Plan
EMPr	Environmental Management Programme Report
EAP	Environmental Assessment Practitioner
FPA	Fire Protection Agency
HCS	Hazardous chemical Substance
NEMA	National Environmental Management Act, 1998 (Act No. 107 of 1998)
NEMBA	National Environmental Management: Biodiversity Act ,2004 (Act No. 10 of
	2004)
NEMWA	National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008)
MSDS	Material Safety Data Sheet
RI&AP's	Registered Interested and affected parties

# 3. ROLES AND RESPONSIBILITIES FOR ENVIRONMENTAL MANAGEMENT PROGRAMME (EMPr) IMPLEMENTATION

The effective implementation of this generic EMPr is dependent on established and clear roles, responsibilities and reporting lines within an institutional framework. This section of the EMPr gives guidance to the various environmental roles and reporting lines, however, project specific requirements will ultimately determine the need for the appointment of specific person(s) to undertake specific roles and or responsibilities. As such, it must be noted that in the event that no specific person, for example, an environmental control officer (ECO) is appointed, the holder of the EA remains responsible for ensuring that the duties indicated in this document for action by the ECO are undertaken.

Responsible Person(s)	Role and Responsibilities
Developer's Project Manager (DPM)	Role The Project Developer is accountable for ensuring compliance with the EMPr and any conditions of approval from the competent authority (CA). Where required, an environmental control officer (ECO) must be contracted by the Project Developer to objectively monitor the implementation of the EMPr according to relevant environmental legislation, and the conditions of the environmental authorisation (EA). The Project Developer is further responsible for providing and giving mandate to enable the ECO to perform responsibilities, and he must ensure that the ECO is integrated as part of the project team while remaining independent.
	<ul> <li>Responsibilities</li> <li>Be fully conversant with the conditions of the EA;</li> <li>Ensure that all stipulations within the EMPr are communicated and adhered to by the Developer and its Contractor(s);</li> <li>Issuing of site instructions to the Contractor for corrective actions required;</li> <li>Monitor the implementation of the EMPr throughout the project by means of site inspections and meetings. Overall management of the project and EMPr implementation; and</li> <li>Ensure that periodic environmental performance audits are undertaken on the project implementation.</li> </ul>
Developer Site Supervisor (DSS)	Role The DSS reports directly to the DPM, oversees site works, liaises with the contractor(s) and the ECO. The DSS

 Table 1: Guide to roles and responsibilities for implementation of an EMPr

Responsible Person(s)	Role and Responsibilities
	is responsible for the day to day implementation of the EMPr and for ensuring the compliance of all contractors with the conditions and requirements stipulated in the EMPr.
	<ul> <li>Responsibilities</li> <li>Ensure that all contractors identify a contractor's Environmental Officer (cEO);</li> <li>Must be fully conversant with the conditions of the EA. Oversees site works, liaison with Contractor, DPM and ECO;</li> <li>Must ensure that all landowners have the relevant contact details of the site staff, ECO and cEO;</li> <li>Issuing of site instructions to the Contractor for corrective actions required;</li> <li>Will issue all non-compliances to contractors; and</li> <li>Ratify the Monthly Environmental Report.</li> </ul>
Environmental Control Officer (ECO)	Role The ECO should have appropriate training and experience in the implementation of environmental management specifications. The primary role of the ECO is to act as an independent quality controller and monitoring agent regarding all environmental concerns and associated environmental impacts. In this respect, the ECO is to conduct periodic site inspections, attend regular site meetings, pre-empt problems and suggest mitigation and be available to advise on incidental issues that arise. The ECO is also required to conduct compliance audits, verifying the monitoring reports submitted by the cEO. The ECO provides feedback to the DSS and Project Manager regarding all environmental matters. The Contractor, cEO and dEO are answerable to the Environmental Control Officer for non-compliance with the Performance Specifications as set out in the EA and EMPr.
	The ECO provides feedback to the DSS and Project Manager, who in turn reports back to the Contractor and potential and Registered Interested &Affected Parties' (RI&AP's), as required. Issues of non- compliance raised by the ECO must be taken up by the Project Manager, and resolved with the Contractor as per the conditions of his contract. Decisions regarding environmental procedures, specifications and requirements which have a cost implication (i.e. those that are deemed to be a variation, not allowed for in the Performance Specification) must be endorsed by the Project Manager. The ECO must also, as specified by the EA, report to the relevant CA as and when required.

Responsible Person(s)	Role and Responsibilities
	Responsibilities         The responsibilities of the ECO will include the following:         - Be aware of the findings and conclusions of all EA related to the development;         - Be formillar with the recommendations and mitigation measures of this EMPr;         - Be conversant with relevant environmental legislation, policies and procedures, and ensure compliance with them;         - Undertake regular and comprehensive site inspections / audits of the construction site according to the generic EMP and applicable licenses in order to monitor compliance as required;         - Educate the construction team about the management measures contained in the EMPr and environmental licenses;         - Compilation and administration of an environmental monitoring plan to ensure that the environmental management measures are implemented and are effective;         - Monitoring the performance of the Contractors and ensuring compliance with the EMPr and associated Method Statements;         - In consultation with the Developer Site Supervisor order the removal of person(s) and/or equipment which are in contravention of the specifications of the EMPr and/or environmental licenses;         - Liaison between the DPM, Contractors, authorities and other lead stakeholders on all environmental concerns;         - Compile a regular environmental audit report highlighting any non-compliance issues as well as satisfactory or exceptional compliance with the EMPr;         - Validating the regular site inspection reports, which are to be prepared by the contractor Environmental Officer (CEO);         - Checking the cEO's public complaints register in which all complaint

Responsible Person(s)	Role and Responsibilities
	<ul> <li>reviewing the training programmes of the Contractor;</li> <li>In case of non-compliances, the ECO must first communicate this to the Senior Site Supervisor, who has the power to ensure this matter is addressed. Should no action or insufficient action be taken, the ECO may report this matter to the authorities as non-compliance;</li> <li>Maintenance, update and review of the EMPr;</li> <li>Communication of all modifications to the EMPr to the relevant stakeholders.</li> </ul>
developer Environmental Officer	Role
(dEO)	The dEOs will report to the Project Manager and are responsible for implementation of the EMPr, environmental monitoring and reporting, providing environmental input to the Project Manager and Contractor's Manager, liaising with contractors and the landowners as well as a range of environmental coordination responsibilities.
	Responsibilities
	- Be fully conversant with the EMPr;
	<ul> <li>Be familiar with the recommendations and mitigation measures of this EMPr, and implement these measures;</li> </ul>
	<ul> <li>Ensure that all stipulations within the EMPr are communicated and adhered to by the Employees, Contractor(s);</li> </ul>
	- Confine the development site to the demarcated area;
	<ul> <li>Conduct environmental internal audits with regards to EMPr and authorisation compliance (on cEO);</li> <li>Assist the contractors in addressing environmental challenges on site;</li> </ul>
	<ul> <li>Assist in incident management:</li> <li>Reporting environmental incidents to developer and ensuring that corrective action is taken, and lessons learnt shared;</li> </ul>
	<ul> <li>Assist the contractor in investigating environmental incidents and compile investigation reports;</li> <li>Follow-up on pre-warnings, defects, non-conformance reports;</li> </ul>
	- Measure and communicate environmental performance to the Contractor;
	- Conduct environmental awareness training on site together with ECO and cEO;

Responsible Person(s)	Role and Responsibilities
	<ul> <li>Ensure that the necessary legal permits and / or licenses are in place and up to date;</li> <li>Acting as Developer's Environmental Representative on site and work together with the ECO and contractor;</li> </ul>
Contractor	Role The Contractor appoints the cEO and has overall responsibility for ensuring that all work, activities, and actions linked to the delivery of the contract are in line with the EMPr and that Method Statements are implemented as described. External contractors must ensure compliance with this EMPr while performing the onsite activities as per their contract with the Project Developer. The contractors are required, where specified, to provide Method Statements setting out in detail how the impact management actions contained in the EMPr will be implemented during the development or expansion of substation infrastructure for the transmission and distribution of electricity activities.
	<ul> <li><u>Responsibilities</u></li> <li>project delivery and quality control for the development services as per appointment;</li> <li>employ a suitably qualified person to monitor and report to the Project Developer's appointed person on the daily activities on-site during the construction period;</li> <li>ensure that safe, environmentally acceptable working methods and practices are implemented and that equipment is properly operated and maintained, to facilitate proper access and enable any operation to be carried out safely;</li> <li>attend on site meeting(s) prior to the commencement of activities to confirm the procedure and designated activity zones;</li> <li>ensure that contractors' staff repair, at their own cost, any environmental damage as a result of a contravention of the specifications contained in EMPr, to the satisfaction of the ECO.</li> </ul>
contractor Environmental Officer (cEO)	Role Each Contractor affected by the EMPr should appoint a cEO, who is responsible for the on-site implementation of the EMPr (or relevant sections of the EMPr). The Contractor's representative can be the site agent; site engineer; a dedicated environmental officer; or an independent consultant. The Contractor must ensure that the Contractor's Representative is suitably qualified to perform the necessary tasks and is appointed at a level such that she/he can interact effectively with other site Contractors,

Responsible Person(s)	Role and Responsibilities
	labourers, the Environmental Control Officer and the public. As a minimum the cEO shall meet the
	following criteria:
	Responsibilities
	- Be on site throughout the duration of the project and be dedicated to the project;
	<ul> <li>Ensure all their staff are aware of the environmental requirements, conditions and constraints with respect to all of their activities on site;</li> </ul>
	<ul> <li>Implementing the environmental conditions, guidelines and requirements as stipulated within the EA, EMPr and Method Statements;</li> </ul>
	- Attend the Environmental Site Meeting;
	<ul> <li>Undertaking corrective actions where non-compliances are registered within the stipulated timeframes;</li> </ul>
	<ul> <li>Report back formally on the completion of corrective actions;</li> </ul>
	- Assist the ECO in maintaining all the site documentation;
	- Prepare the site inspection reports and corrective action reports for submission to the ECO;
	<ul> <li>Assist the ECO with the preparing of the monthly report; and</li> </ul>
	<ul> <li>Where more than one Contractor is undertaking work on site, each company appointed as a Contractor will appoint a cEO representing that company.</li> </ul>

# 4. ENVIRONMENTAL DOCUMENTATION REPORTING AND COMPLIANCE

To ensure accountable and demonstrated implementation of the EMPr, a number of reporting systems, documentation controls and compliance mechanisms must be in place for all substation infrastructure projects as a minimum requirement.

4.1 Document control/Filing system

The holder of the EA is solely responsible for the upkeep and management of the EMPr file. As a minimum, all documentation detailed below will be stored in the EMPr file. A hard copy of all documentation shall be filed, while an electronic copy may be kept where relevant. A duplicate file will be maintained in the office of the DSS (where applicable). This duplicate file must remain current and up-to-date. The filing system must be updated and relevant documents added as required. The EMPr file must be made available at all times on request by the CA or other relevant authorities. The EMPr file will form part of any environmental audits undertaken as prescribed in the EIA Regulations.

4.2 Documentation to be available

At the outset of the project the following preliminary list of documents shall be placed in the filing system and be accessible at all times:

- Full copy of the signed EA from the CA in terms of NEMA, granting approval for the development or expansion;
- Copy of the generic and site specific EMPr as well as any amendments thereof;
- Copy of declaration of implementing generic EMPr and subsequent approval of site specific EMPr and amendments thereof;
- All method statements;
- Completed environmental checklists;
- Minutes and attendance register of environmental site meetings;
- An up-to-date environmental incident log;
- A copy of all instructions or directives issued;
- A copy of all corrective actions signed off. The corrective actions must be filed in such a way that a clear reference is made to the non-compliance record;
- Complaints register.

#### 4.3 Weekly Environmental Checklist

The ECOs are required to complete a Weekly Environmental Checklist, the format of which is to be agreed prior to commencement of the activity. The ECOs are required to sign and date the checklist, retain a copy in the EMPr file and submit a copy of the completed checklist to the DSS on a weekly basis.

The checklists will form the basis for the Monthly Environmental Reports. Copies of all completed checklists will be attached as Annexures to the Environmental Audit Report as required in terms of the EIA Regulations.

# 4.4 Environmental site meetings

Minutes of the environmental site meetings shall be kept. The minutes must include an attendance register and will be attached to the Monthly Report that is distributed to attendees. Each set of minutes must clearly record "Matters for Attention" that will be reviewed at the next meeting.

4.5 Required Method Statements

The method statement will be done in such detail that the ECOs are enabled to assess whether the contractor's proposal is in accordance with the EMPr.

The method statement must cover applicable details with regard to:

- development procedures;
- materials and equipment to be used;
- getting the equipment to and from site;
- how the equipment/ material will be moved while on site;
- how and where material will be stored;
- the containment (or action to be taken if containment is not possible) of leaks or spills of any liquid or material that may occur;
- timing and location of activities;
- compliance/ non-compliance with the EMPr; and
- any other information deemed necessary by the ECOs.

Unless indicated otherwise by the Project Manager, the Contractor shall provide the following method statements to the Project Manager no less than 14 days prior to the commencement date of the activity:

- Site establishment Camps, Lay-down or storage areas, satellite camps, infrastructure;
- Batch plants;
- Workshop or plant servicing;
- Handling, transport and storage of Hazardous Chemical Substance's;
- Vegetation management Protected, clearing, aliens, felling;
- Access management Roads, gates, crossings etc.;
- Fire plan;
- Waste management transport, storage, segregation, classification, disposal (all waste streams);
- Social interaction complaints management, compensation claims, access to properties etc.;
- Water use (source, abstraction and disposal), access and all related information, crossings and mitigation;
- Emergency preparedness Spills, training, other environmental emergencies;
- Dust and noise management methodologies;
- Fauna interaction and risk management only if the risk was identified wildlife interaction especially on game farms; and
- Heritage and palaeontology management.

The ECOs shall monitor and ensure that the contractors perform in accordance with these method statements. Completed and agreed method statements between the holder of the EA and the contractor shall be captured in Appendix 1.

# 4.6 Environmental Incident Log (Diary)

The ECOs are required to maintain an up-to-date and current Environmental Incident Log (environmental diary). The Environmental Incident Log is a means to record all environmental incidents and/or all non-compliance notice would not be issued. An environmental incident is defined as:

- Any deviation from the listed impact management actions (listed in this EMPr) that may be addressed immediately by the ECOs. (For example a contractor's staff member littering or a drip tray that has not been emptied);
- Any environmental impact resulting from an action or activity by a contractor in contravention of the environmental stipulations and guidelines listed in the EMPr which as a single event would have a minor impact but which if cumulative and continuous would have a significant effect (for example no toilet paper available in the ablutions for an afternoon); and
- General environmental information such as road kills or injured wildlife.

The ECOs are to record all environmental incidents in the Environmental Incident Log. All incidents regardless of severity must be reported to the Developer. The Log is to be kept in the EMPr file and at a minimum the following will be recorded for each environmental incident:

- The date and time of the incident;
- Description of the incident;
- The name of the Contractor responsible;
- The incident must be listed as significant or minor;
- If the incident is listed as significant, a non-compliance notice must be issued, and recorded in the log;
- Remedial or corrective action taken to mitigate the incident; and
- Record of repeat minor offences by the same contractor or staff member.

The Environmental Incident Log will be captured in the EAR.

# 4.7 Non-compliance

A non-compliance notice will be issued to the responsible contractor by the ECOs via the DSS or Project Manager. The non-compliance notice will be issued in writing; a copy filed in the EMPr file and will at a minimum include the following:

- Time and date of the non-compliance;
- Name of the contractor responsible;
- Nature and description of the non-compliance;
- Recommended / required corrective action; and
- Date by which the corrective action to be completed.
- The contractors shall act immediately when a notice of non-compliance is received and correct whatever is the cause for the issuing of the notice. Complaints received regarding activities on the development site pertaining to the environment shall be recorded in a dedicated register and the response noted with the date and action taken. The ECO should be made aware of any complaints. Any non-compliance with the agreed procedures of the EMPr is a transgression

of the various statutes and laws that define the manner by which the environment is managed. Failure to redress the cause shall be reported to the relevant CA for them to deal with the transgression, as it deems fit. The contractor is deemed not to have complied with the EMPr if, inter alia, There is a deviation from the environmental conditions, impact management outcomes and impact management actions activities, as approved in generic and site specific EMPr as relevant as set out in the EMPr, which deviation has, or may cause, an environmental impact.

#### 4.8 Corrective action records

For each non-compliance notice issued, a documented corrective action must be recorded. On receiving a non-compliance notice from the DSS, the contractor's cEO will ensure that the corrective actions required take place within the stipulated timeframe. On completion of the corrective action the cEO is to issue a Corrective Action Report in writing to the ECOs. If satisfied that the corrective action has been completed, the ECOs are to sign-off on the Corrective Action Report, and attach the report to the non-compliance notice in the EMPr file. A corrective action is considered complete once the report has signed off by the ECOs.

#### 4.9 Photographic record

A digital photographic record will be kept. The photographic record will be used to show before, during and post rehabilitation evidence of the project as well used in cases of damages claims if they arise. Each image must be dated and a brief description note attached.

The Contractor shall:

1. Allow the ECOs access to take photographs of all areas, activities and actions.

The ECOs shall keep an electronic database of photographic records which will include:

- 1. Pictures of all areas designated as work areas, camp areas, development sites and storage areas taken before these areas are set up;
- 2. All bunding and fencing;
- 3. Road conditions and road verges;
- 4. Condition of all farm fences;
- 5. Topsoil storage areas;
- 6. All areas to be cordoned off during construction;
- 7. Waste management sites;
- 8. Ablution facilities (inside and out);
- 9. Any non-conformances deemed to be "significant";
- 10. All completed corrective actions for non-compliances;
- 11. All required signage;
- 12. Photographic recordings of incidents;
- 13. All areas before, during and post rehabilitation; and
- 14. Include relevant photographs in the Final Environmental Audit Report.

# 4.10 Complaints register

The ECOs shall keep a current and up-to-date complaints register. The complaints register is to be a record of all complaints received from communities, stakeholders and individuals. The Complaints Record shall:

- 1. Record the name and contact details of the complainant;
- 2. Record the time and date of the complaint;
- 3. Contain a detailed description of the complaint;
- 4. Where relevant and appropriate, contain photographic evidence of the complaint or damage (ECOs to take relevant photographs); and
- 5. Contain a copy of the ECOs written response to each complaint received and keep a record of any further correspondence with the complainant. The ECO's written response will include a description of any corrective action to be taken and must be signed by the Contractor, ECO and affected party. Where a damage claim is issued by the complainant, the ECOs shall respond as described in (section 4.11) below.
- 4.11 Claims for damages

In the event that a Claim for Damages is submitted by a community, landowner or individual, the ECOs shall:

- 1. Record the full detail of the complaint as described in (section 4.10) above;
- 2. The DPM will evaluate the claim and associated damage and submit the evaluation to the Senior Site Representative for approval;
- 3. Following consideration by the DPM, the claim is to be resolved and settled immediately, or the reason for not accepting the claim communicated in writing to the claimant. Should the claimant not accept this, the ECO shall, in writing report the incident to the Developer's negotiator and legal department; and
- 4. A formal record of the response by the ECOs to the claimant as well as the rectification of the method of making payments not amount will be recorded in the EMPr file.
- 4.12 Interactions with affected parties

Open, transparent and good relations with affected landowners, communities and regional staff are an essential aspect to the successful management and mitigation of environmental impacts.

The ECOs shall:

- 1. Ensure that all queries, complaints and claims are dealt within an agreed timeframe;
- 2. Ensure that any or all agreements are documented, signed by all parties and a record of the agreement kept in the EMPr file;
- 3. Ensure that a complaints telephone numbers are made available to all landowners and affected parties; and
- 4. Ensure that contact with affected parties is courteous at all times;

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#### 4.13 Environmental audits

Internal environmental audits of the activity and implementation of the EMPr must be undertaken. The findings and outcomes included in the EMPr file and submitted to the CA at intervals as indicated in the EA.

The ECOs must prepare a monthly EAR. The report will be tabled as the key point on the agenda of the Environmental Site Meeting. The Report is submitted for acceptance at the meeting and the final report will be circulated to the Project Manager and filed in the EMPr file. At a frequency determined by the EA, the ECOs shall submit the monthly reports to the CA. At a minimum the monthly report is to cover the following:

- Weekly Environmental Checklists;
- Deviations and non-compliances with the checklists;
- Non-compliances issued;
- Completed and reported corrective actions;
- Environmental Monitoring;
- General environmental findings and actions; and
- Minutes of the Bi-monthly Environmental Site Meetings.

#### 4.14 Final environmental audits

On final completion of the rehabilitation and/or requirements of the EA a final EAR is to be prepared and submitted to the CA. The EAR must comply with Appendix 7 of the EIA Regulations.

#### PART B: SECTION 1: Pre-approved generic EMPr template

#### 5. IMPACT MANAGEMENT OUTCOMES AND IMPACT MANAGEMENT ACTIONS

This section provides a pre-approved generic EMPr template with aspects that are common to the development of substation infrastructure for the transmission and distribution of electricity. There is a list of aspects identified for the development or expansion of substation infrastructure for the transmission and distribution of electricity, and for each aspect a set of prescribed impact management outcomes and associated impact management actions have been identified. Holders of EAs are responsible to ensure the implementation of these outcomes and actions for all projects as a minimum requirement, in order to mitigate the impact of such aspects identified for the development or expansion of substation infrastructure for the transmission and distribution of electricity.

The template provided below is to be completed by providing the information under each heading for each environmental impact management action.

The completed template must be signed and dated on each page by both the contractor and the holder of the EA prior to commencement of the activity. The method statements prepared and agreed to by the holder of the EA must be appended to the template as Appendix 1. Each method statement must also be duly signed and dated on each page by the contactor and the holder of the EA. This template, once signed and dated, is legally binding. The holder of the EA will remain responsible for its implementation.

# 5.1 Environmental awareness training

Impact management outcome: All onsite staff are aware and under	erstands the ind	ividual responsibilitie	es in terms of this EA	۹Pr.		
Impact Management Actions	Implementati	on		Monitoring		
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of
	person	implementation	implementation	person		compliance
<ul> <li>All staff must receive environmental awareness training prior to commencement of the activities;</li> </ul>						
- The Contractor must allow for sufficient sessions to train all						
personnel with no more than 20 personnel attending each course;						
<ul> <li>Refresher environmental awareness training is available as and when required;</li> </ul>						
- All staff are aware of the conditions and controls linked to the						
EA and within the EMPr and made aware of their individual						
roles and responsibilities in achieving compliance with the EA and EMPr;						
- The Contractor must erect and maintain information posters at						
following information as a minimum:						
b) No litterina.						
<ul> <li>Environmental awareness training must include as a minimum the following:</li> </ul>						
a) Description of significant environmental impacts, actual or potential, related to their work activities;						
b) Mitigation measures to be implemented when carrying out specific activities;						
c) Emergency preparedness and response						
procedures;						

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d) Emergency procedures;			
e) Procedures to be followed when working near or			
within sensitive areas;			
f) Wastewater management procedures;			
g) Water usage and conservation;			
h) Solid waste management procedures;			
i) Sanitation procedures;			
j) Fire prevention; and			
k) Disease prevention.			
A record of all environmental awareness training courses			
undertaken as part of the EMPr must be available;			
Educate workers on the dangers of open and/or unattended			
fires;			
A staff attendance register of all staff to have received			
environmental awareness training must be available.			
Course material must be available and presented in			
appropriate languages that all staff can understand.			

#### 5.2 Site Establishment development

Impact management outcome: Impacts on the environment are minimised during site establishment and the development footprint are kept to demarcated development area.

Impact Management Actions	Implementation			Monitoring		
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of
	person	implementation	implementation	person		compliance
<ul> <li>A method statement must be provided by the contractor prior</li> </ul>						
to any onsite activity that includes the layout of the						
construction camp in the form of a plan showing the location						
of key infrastructure and services (where applicable), including						

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	but not limited to offices, overnight vehicle parking areas,			
	stores, the workshop, stockpile and lay down areas, hazardous			
	materials storage areas (including fuels), the batching plant (if			
	one is located at the construction camp), designated access			
	routes, equipment cleaning areas and the placement of staff			
	accommodation, cooking and ablution facilities, waste and			
	wastewater management;			
_	Location of camps must be within approved area to ensure			
	that the site does not impact on sensitive areas identified in the			
	environmental assessment or site walk through;			
_	Sites must be located where possible on previously disturbed			
	areas;			
_	The camp must be fenced in accordance with Section 5.5:			
	Fencing and gate installation; and			
_	The use of existing accommodation for contractor staff, where			
	possible, is encouraged.			

# 5.3 Access restricted areas

Impact management outcome: Access to restricted areas prevented.									
Impact Management Actions	Implementatio	on	Monitoring						
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of			
	person	implementation	implementation	person		compliance			
<ul> <li>Identification of access restricted areas is to be informed by</li> </ul>									
the environmental assessment, site walk through and any									
additional areas identified during development;									
- Erect, demarcate and maintain a temporary barrier with									
clear signage around the perimeter of any access restricted									
area, colour coding could be used if appropriate; and									

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-	Unauthorised access and development related activity			
	inside access restricted areas is prohibited.			

#### 5.4 Access roads

**Impact management outcome:** Minimise impact to the environment through the planned and restricted movement of vehicles on site.

Impact Management Actions	Implementati	on		Monitoring		
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of
	person	implementation	implementation	person		compliance
<ul> <li>An access agreement must be formalised and signed by the DPM, Contractor and landowner before commencing with the activities;</li> <li>All private roads used for access to the servitude must be maintained and upon completion of the works, be left in at least the original condition</li> <li>All contractors must be made aware of all these access routes.</li> <li>Any access route deviation from that in the written agreement must be closed and re-vegetated immediately, at the contractor's expense;</li> <li>Maximum use of both existing servitudes and existing roads must be made to minimize further disturbance through the development of new roads;</li> <li>In circumstances where private roads must be used, the condition of the said roads must be recorded in accordance with section 4.9: photographic record; prior to use and the condition thereof agreed by the landowner, the DPM, and the contractor;</li> </ul>						

	croplands			
_	Access roads must only be developed on a pre-planned			
	and approved roads.			

#### 5.5 Fencing and Gate installation

**Impact management outcome:** Minimise impact to the environment and ensure safe and controlled access to the site through the erection of fencing and gates where required.

Imp	act Management Actions	Implementati	Implementation			Monitoring			
		Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of		
		person	implementation	implementation	person		compliance		
_	Use existing gates provided to gain access to all parts of the								
	area authorised for development, where possible;								
-	Existing and new gates to be recorded and documented in								
	accordance with section 4.9: photographic record;								
-	All gates must be fitted with locks and be kept locked at all								
	times during the development phase, unless otherwise								
	agreed with the landowner;								
-	At points where the line crosses a fence in which there is no								
	suitable gate within the extent of the line servitude, on the								
	instruction of the DPM, a gate must be installed at the								
	approval of the landowner;								
_	Care must be taken that the gates must be so erected that								
	there is a gap of no more than 100 mm between the bottom								
	of the gate and the ground;								
_	Where gates are installed in jackal proof fencing, a suitable								
	reinforced concrete sill must be provided beneath the gate;								
_	Original tension must be maintained in the fence wires;								
_	All gates installed in electrified fencing must be re-electrified;								
_	All demarcation fencing and barriers must be maintained in								

	good working order for the duration of the development			
	activities;			
_	Fencing must be erected around the camp, batching			
	plants, hazardous storage areas, and all designated access			
	restricted areas, where applicable;			
_	Any temporary fencing to restrict the movement of life-stock			
	must only be erected with the permission of the land owner.			
_	All fencing must be developed of high quality material			
	bearing the SABS mark;			
-	The use of razor wire as fencing must be avoided;			
_	Fenced areas with gate access must remain locked after			
	hours, during weekends and on holidays if staff is away from			
	site. Site security will be required at all times;			
_	On completion of the development phase all temporary			
	fences are to be removed;			
_	The contractor must ensure that all fence uprights are			
	appropriately removed, ensuring that no uprights are cut at			
	ground level but rather removed completely.			

#### 5.6 Water Supply Management

Impact management outcome: Undertake responsible water usage.									
Impact Management Actions	Implementati	on	Monitoring						
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of			
	person	implementation	implementation	person		compliance			
- All abstraction points or bore holes must be registered with									
the DWS and suitable water meters installed to ensure that									
the abstracted volumes are measured on a daily basis;									
<ul> <li>The Contractor must ensure the following:</li> </ul>									
a. The vehicle abstracting water from a river does not									

enter or cross it and does not operate from within the river;			
<ul> <li>No damage occurs to the river bed or banks and that the abstraction of water does not entail stream diversion activities; and</li> </ul>			
c. All reasonable measures to limit pollution or sedimentation of the downstream watercourse are implemented.			
<ul> <li>Ensure water conservation is being practiced by:</li> </ul>			
a. Minimising water use during cleaning of equipment;			
b. Undertaking regular audits of water systems; and			
c. Including a discussion on water usage and			
conservation during environmental awareness training.			
d. The use of grey water is encouraged.			

# 5.7 Storm and waste water management

Impact management outcome: Impacts to the environment caused by storm water and wastewater discharges during construction are avoided.

Impact Management Actions	Implementation			Monitoring		
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of
	person	implementation	implementation	person		compliance
- Runoff from the cement/ concrete batching areas must be						
strictly controlled, and contaminated water must be						
collected, stored and either treated or disposed of off-site,						
at a location approved by the project manager;						
- All spillage of oil onto concrete surfaces must be controlled						
by the use of an approved absorbent material and the used						
absorbent material disposed of at an appropriate waste						
disposal facility;						
- Natural storm water runoff not contaminated during the						

	development and clean water can be discharged			
	directly to watercourses and water bodies, subject to the			
	Project Manager's approval and support by the ECO;			
_	Water that has been contaminated with suspended solids,			
	such as soils and silt, may be released into watercourses or			
	water bodies only once all suspended solids have been			
	removed from the water by settling out these solids in			
	settlement ponds. The release of settled water back into the			
	environment must be subject to the Project Manager's			
	approval and support by the ECO.			

# 5.8 Solid and hazardous waste management

Impact Management Actions	Implementation	on	Monitoring						
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of			
	person	implementation	implementation	person		compliance			
– All measures regarding waste management must be									
undertaken using an integrated waste management									
approach;									
- Sufficient, covered waste collection bins (scavenger and									
weatherproof) must be provided;									
- A suitably positioned and clearly demarcated waste									
collection site must be identified and provided;									
- The waste collection site must be maintained in a clean and									
orderly manner;									
- Waste must be segregated into separate bins and clearly									
marked for each waste type for recycling and safe disposal;									
<ul> <li>Staff must be trained in waste segregation;</li> </ul>									
<ul> <li>Bins must be emptied regularly;</li> </ul>									

Impact management outcome: Wastes are appropriately stored, handled and safely disposed of at a recognised waste facility.

-	General waste produced onsite must be disposed of at			
	registered waste disposal sites/ recycling company;			
_	Hazardous waste must be disposed of at a registered waste			
	disposal site;			
_	Certificates of safe disposal for general, hazardous and			
	recycled waste must be maintained.			

# 5.9 Protection of watercourses and estuaries

Impact management outcome: Pollution and contamination of the watercourse environment and or estuary erosion are prevented.

Impact Management Actions	Implementation			Monitoring		
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of
	person	implementation	implementation	person		compliance
- All watercourses must be protected from direct or indirect						
spills of pollutants such as solid waste, sewage, cement, oils,						
fuels, chemicals, aggregate tailings, wash and						
contaminated water or organic material resulting from						
the Contractor's activities;						
<ul> <li>In the event of a spill, prompt action must be taken to clear</li> </ul>						
the polluted or affected areas;						
<ul> <li>Where possible, no development equipment must traverse any seasonal or permanent wetland</li> </ul>						
<ul> <li>No return flow into the estuaries must be allowed and no</li> </ul>						
disturbance of the Estuarine functional Zone should occur;						
<ul> <li>Development of permanent watercourse or estuary crossing</li> </ul>						
must only be undertaken where no alternative access to						
tower position is available;						
– There must not be any impact on the long term						
morphological dynamics of watercourses or estuaries;						
- Existing crossing points must be favored over the creation of						

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	new crossings (including temporary access)				
—	When working in or near any watercourse or estuary, the			ļ	
	following environmental controls and consideration must be			ļ	
	taken:			ļ	
	a) Water levels during the period of construction;			ļ	
	No altering of the bed, banks, course or characteristics of a			ļ	
	watercourse			ļ	
	b) During the execution of the works, appropriate			ļ	
	measures to prevent pollution and contamination of the			ļ	
	riparian environment must be implemented e.g. including			ļ	
	ensuring that construction equipment is well maintained;			ļ	
	c) Where earthwork is being undertaken in close proximity			ļ	
	to any watercourse, slopes must be stabilised using suitable			ļ	
	materials, i.e. sandbags or geotextile fabric, to prevent sand			ļ	
	and rock from entering the channel; and			ļ	
	d) Appropriate rehabilitation and re-vegetation measures			ļ	
	for the watercourse banks must be implemented timeously.			ļ	
	In this regard, the banks should be appropriately and				
	incrementally stabilised as soon as development allows				
				1 '	

# 5.10 Vegetation clearing

Impact management outcome: Vegetation clearing is restricted to the authorised development footprint of the proposed infrastructure.

Impact Management Actions	Implementation			Monitoring		
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of
	person	implementation	implementation	person		compliance
General:						
- Indigenous vegetation which does not interfere with the						
development must be left undisturbed;						
<ul> <li>Protected or endangered species may occur on or near the</li> </ul>						

	development site. Special care should be taken not to			
	damage such species;			
_	Search, rescue and replanting of all protected and			
	endangered species likely to be damaged during project			
	development must be identified by the relevant specialist			
	and completed prior to any development or clearing;			
_	Permits for removal must be obtained from the relevant CA			
	prior to the cutting or clearing of the affected species, and			
	they must be filed;			
_	The Environmental Audit Report must confirm that all			
	identified species have been rescued and replanted and			
	that the location of replanting is compliant with conditions of			
	approvals;			
_	Trees felled due to construction must be documented and			
	form part of the Environmental Audit Report;			
_	Rivers and watercourses must be kept clear of felled trees,			
	vegetation cuttings and debris;			
_	Only a registered pest control operator may apply			
	herbicides on a commercial basis and commercial			
	application must be carried out under the supervision of a			
	registered pest control operator, supervision of a registered			
	pest control operator or is appropriately trained;			
_	A daily register must be kept of all relevant details of			
	herbicide usage;			
_	No herbicides must be used in estuaries;			
-	All protected species and sensitive vegetation not removed			
	must be clearly marked and such areas fenced off in			
	accordance to Section 5.3: Access restricted areas.			
	Alien invasive vegetation must be removed and disposed of			
	at a licensed waste management facility.			

# 5.11 Protection of fauna

Impact management outcome: Disturbance to fauna is minimised.						
Impact Management Actions	Implementati	ion		Monitoring		
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of
	person	implementation	implementation	person		compliance
- No interference with livestock must occur without the						
landowner's written consent and with the landowner or						
a person representing the landowner being present;						
- The breeding sites of raptors and other wild birds species						
must be taken into consideration during the planning of the						
development programme;						
- Breeding sites must be kept intact and disturbance to						
breeding birds must be avoided. Special care must be taken						
where nestlings or fledglings are present;						
- Special recommendations of the avian specialist must be						
adhered to at all times to prevent unnecessary disturbance						
of birds;						
- No poaching must be tolerated under any circumstances.						
All animal dens in close proximity to the works areas must be						
marked as Access restricted areas;						
<ul> <li>No deliberate or intentional killing of fauna is allowed;</li> </ul>						
<ul> <li>In areas where snakes are abundant, snake deterrents to be</li> </ul>						
deployed on the pylons to prevent snakes climbing up,						
being electrocuted and causing power outages; and						
<ul> <li>No Threatened or Protected species (ToPs) and/or protected</li> </ul>						
fauna as listed according NEMBA (Act No. 10 of 2004) and						
relevant provincial ordinances may be removed and/or						
relocated without appropriate authorisations/permits.						

#### 5.12 Protection of heritage resources

Impact management outcome: Impact to heritage resources is minimised.									
Impact Management Actions	Implementati	ion		Monitoring					
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of			
	person	implementation	implementation	person		compliance			
<ul> <li>Identify, demarcate and prevent impact to all known sensitive heritage features on site in accordance with the No-Go procedure in Section 5.3: Access restricted areas;</li> <li>Carry out general monitoring of excavations for potential fossils, artefacts and material of heritage importance;</li> <li>All work must cease immediately, if any human remains and/or other archaeological, palaeontological and historical material are uncovered. Such material, if exposed, must be reported to the nearest museum, archaeologist/palaeontologist (or the South African Police Services), so that a systematic and professional investigation can be undertaken. Sufficient time must be allowed to remove/collect such material before development recommences</li> </ul>									

# 5.13 Safety of the public

Impact management outcome: All precautions are taken to minimise the risk of injury, harm or complaints.									
Impact Management Actions	Implementati	ion	Monitoring						
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of			
	person	implementation	implementation	person		compliance			
- Identify fire hazards, demarcate and restrict public access to									
these areas as well as notify the local authority of any									
potential threats e.g. large brush stockpiles, fuels etc.;									

-	All unattended open excavations must be adequately			
	fenced or demarcated;			
_	Adequate protective measures must be implemented to			
	prevent unauthorised access to and climbing of partly			
	constructed towers and protective scaffolding;			
_	Ensure structures vulnerable to high winds are secured;			
_	Maintain an incidents and complaints register in which all			
	incidents or complaints involving the public are logged.			

#### 5.14 Sanitation

**Impact management outcome:** Clean and well maintained toilet facilities are available to all staff in an effort to minimise the risk of disease and impact to the environment.

Impact Management Actions	Implementation			Monitoring		
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of
	person	implementation	implementation	person		compliance
- Mobile chemical toilets are installed onsite if no other						
ablution facilities are available;						
- The use of ablution facilities and or mobile toilets must be						
used at all times and no indiscriminate use of the veld for the						
purposes of ablutions must be permitted under any						
circumstances;						
- Where mobile chemical toilets are required, the following						
must be ensured:						
a) Toilets are located no closer than 100 m to any						
watercourse or water body;						
b) Toilets are secured to the ground to prevent them from						
toppling due to wind or any other cause;						
c) No spillage occurs when the toilets are cleaned or						
emptied and the contents are managed in accordance						

	with the EMPr;			
	d) Toilets have an external closing mechanism and are			
	closed and secured from the outside when not in use to			
	prevent toilet paper from being blown out;			
	e) Toilets are emptied before long weekends and workers			
	holidays, and must be locked after working hours;			
	f) Toilets are serviced regularly and the ECO must inspect			
	toilets to ensure compliance to health standards;			
_	A copy of the waste disposal certificates must be			
	maintained.			

# 5.15 Prevention of disease

Impact Management outcome: All necessary precautions linked to the spread of disease are taken.							
Impact Management Actions	Implementation			Monitoring			
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of	
	person	implementation	implementation	person		compliance	
<ul> <li>Undertake environmentally-friendly pest control in the camp</li> </ul>							
area;							
- Ensure that the workforce is sensitised to the effects of							
sexually transmitted diseases, especially HIV AIDS;							
<ul> <li>The Contractor must ensure that information posters on AIDS</li> </ul>							
are displayed in the Contractor Camp area;							
<ul> <li>Information and education relating to sexually transmitted</li> </ul>							
diseases to be made available to both construction workers							
and local community, where applicable;							
<ul> <li>Free condoms must be made available to all staff on site at</li> </ul>							
central points;							
<ul> <li>Medical support must be made available;</li> </ul>							
- Provide access to Voluntary HIV Testing and Counselling							
S	ervices.						
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#### 5.16 Emergency procedures

Impact management outcome: Emergency procedures are in place to enable a rapid and effective response to all types of environmental emergencies.

Impact Management Actions	Implementati	on		Monitoring				
	Responsible person	Method of implementation	Timeframe for implementation	Responsible person	Frequency	Evidence of compliance		
<ul> <li>Compile an Emergency Response Action Plan (ERAP) prior to the commencement of the proposed project;</li> <li>The Emergency Plan must deal with accidents, potential spillages and fires in line with relevant legislation;</li> <li>All staff must be made aware of emergency procedures as part of environmental awareness training;</li> <li>The relevant local authority must be made aware of a fire as soon as it starts;</li> <li>In the event of emergency necessary mitigation measures to contain the spill or leak must be implemented (see Hazardous Substances section 5.17).</li> </ul>								

#### 5.17 Hazardous substances

Impact management outcome: Safe storage, handling, use and disposal of hazardous substances.								
Impact Management Actions	Implementation			Monitoring				
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of		
	person	implementation	implementation	person		compliance		
– The use and storage of hazardous substances to be								
minimised and non-hazardous and non-toxic alternatives								

	substituted where possible;			
-	All hazardous substances must be stored in suitable			
	containers as defined in the Method Statement;			
_	Containers must be clearly marked to indicate contents,			
	quantities and safety requirements;			
_	All storage areas must be bunded. The bunded area must			
	be of sufficient capacity to contain a spill / leak from the			
	stored containers;			
_	Bunded areas to be suitably lined with a SABS approved			
	liner;			
_	An Alphabetical Hazardous Chemical Substance (HCS)			
	control sheet must be drawn up and kept up to date on a			
	continuous basis;			
_	All hazardous chemicals that will be used on site must have			
	Material Safety Data Sheets (MSDS);			
_	All employees working with HCS must be trained in the safe			
	use of the substance and according to the safety data			
	sheet;			
_	Employees handling hazardous substances / materials must			
	be aware of the potential impacts and follow appropriate			
	safety measures. Appropriate personal protective			
	equipment must be made available;			
_	The Contractor must ensure that diesel and other liquid fuel,			
	oil and hydraulic fluid is stored in appropriate storage tanks			
	or in bowsers;			
_	The tanks/ bowsers must be situated on a smooth			
	impermeable surface (concrete) with a permanent bund.			
	The impermeable lining must extend to the crest of the bund			
	and the volume inside the bund must be 130% of the total			
	capacity of all the storage tanks/ bowsers (110% statutory			
	requirement plus an allowance for rainfall);			

#### Dalmanutha Wind (Pty)Ltd Dalmanutha Hybrid Energy Facility

-	The floor of the bund must be sloped, draining to an oil			
	separator;			
_	Provision must be made for refueling at the storage area by			
	protecting the soil with an impermeable groundcover.			
	Where dispensing equipment is used, a drip tray must be			
	used to ensure small spills are contained;			
_	All empty externally dirty drums must be stored on a drip tray			
	or within a bunded area;			
-	No unauthorised access into the hazardous substances			
	storage areas must be permitted;			
-	No smoking must be allowed within the vicinity of the			
	hazardous storage areas;			
-	Adequate fire-fighting equipment must be made available			
	at all hazardous storage areas;			
-	Where refueling away from the dedicated refueling station is			
	required, a mobile refueling unit must be used. Appropriate			
	ground protection such as drip trays must be used;			
-	An appropriately sized spill kit kept onsite relevant to the			
	scale of the activity/s involving the use of hazardous			
	substance must be available at all times;			
-	The responsible operator must have the required training to			
	make use of the spill kit in emergency situations;			
-	An appropriate number of spill kits must be available and			
	must be located in all areas where activities are being			
	undertaken;			
-	In the event of a spill, contaminated soil must be collected in			
	containers and stored in a central location and disposed of			
	according to the National Environmental Management:			
	waste Act 59 of 2008. Reter to Section 5.7 for procedures			
	concerning storm and waste water management and 5.8 for			
	solid and hazardous waste management.			

#### 5.18 Workshop, equipment maintenance and storage

Impact management outcome: Soil, surface water and groundwater contamination is minimised.

Impo	act Management Actions	Implementati	Implementation				
		Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of
		person	implementation	implementation	person		compliance
-	Where possible and practical all maintenance of vehicles						
	and equipment must take place in the workshop area;						
-	During servicing of vehicles or equipment, especially where						
	emergency repairs are effected outside the workshop area,						
	a suitable drip tray must be used to prevent spills onto the						
	soil. The relevant local authority must be made aware of a						
	fire as soon as it starts;						
-	Leaking equipment must be repaired immediately or be						
	removed from site to facilitate repair;						
-	Workshop areas must be monitored for oil and fuel spills;						
-	Appropriately sized spill kit kept onsite relevant to the scale						
	of the activity taking place must be available;						
-	The workshop area must have a bunded concrete slab that						
	is sloped to facilitate runoff into a collection sump or suitable						
	oil / water separator where maintenance work on vehicles						
	and equipment can be performed;						
-	Water drainage from the workshop must be contained and						
	managed in accordance Section 5.7: Storm and waste						
	water management.						

#### 5.19 Batching plants

Impact management outcome: Minimise spillages and contaminati	on of soil, surfa	ice water and groui	ndwater.			
Impact Management Actions	Implementati	ion		Monitoring		
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of
	person	implementation	implementation	person		compliance
<ul> <li>Concrete mixing must be carried out on an impermeable surface;</li> </ul>						
<ul> <li>Batching plants areas must be fitted with a containment facility for the collection of cement laden water.</li> </ul>						
<ul> <li>Dirty water from the batching plant must be contained to prevent soil and groundwater contamination</li> </ul>						
<ul> <li>Bagged cement must be stored in an appropriate facility and at least 10 m away from any water courses, gullies and</li> </ul>						
drains;						
<ul> <li>A washout facility must be provided for washing of concrete associated equipment. Water used for washing must be restricted:</li> </ul>						
<ul> <li>Hardened concrete from the washout facility or concrete mixer can either be reused or disposed of at an appropriate licenced disposal facility;</li> </ul>						
<ul> <li>Empty cement bags must be secured with adequate binding material if these will be temporarily stored on site;</li> </ul>						
- Sand and aggregates containing cement must be kept damp to prevent the generation of dust (Refer to <b>Section</b>						
5.20: Dust emissions)						
- Any excess sand, stone and cement must be removed or						
reused from site on completion of construction period and						
disposed at a registered disposal facility;						
<ul> <li>Temporary fencing must be erected around batching plants</li> </ul>						
in accordance with Section 5.5: Fencing and gate						

#### 5.20 Dust emissions

Impact management outcome: Dust prevention measures are applied to minimise the generation of dust.

Impact Management Actions	Implementati	Implementation				
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of
	person	implementation	implementation	person		compliance
- Take all reasonable measures to minimise the generation of						
dust as a result of project development activities to the satisfaction of the ECO;						
- Removal of vegetation must be avoided until such time as						
soil stripping is required and similarly exposed surfaces must						
be re- vegetated or stabilised as soon as is practically possible;						
- Excavation, handling and transport of erodible materials						
must be avoided under high wind conditions or when a						
visible dust plume is present;						
- During high wind conditions, the ECO must evaluate the						
situation and make recommendations as to whether dust-						
damping measures are adequate, or whether working will						
cease altogether until the wind speed drops to an acceptable level;						
- Where possible, soil stockpiles must be located in sheltered						
areas where they are not exposed to the erosive effects of						
the wind;						
- Where erosion of stockpiles becomes a problem, erosion						
control measures must be implemented at the discretion of						
the ECO;						
<ul> <li>Vehicle speeds must not exceed 40 km/h along dust roads</li> </ul>						

	or 20 km/h when traversing unconsolidated and non-			
	vegetated areas;			
_	Straw stabilisation must be applied at a rate of one bale/10			
	m <sup>2</sup> and harrowed into the top 100 mm of top material, for all			
	completed earthworks;			
-	For significant areas of excavation or exposed ground, dust			
	suppression measures must be used to minimise the spread			
	of dust.			

#### 5.21 Blasting

Impact management outcome: Impact to the environment is minimised through a safe blasting practice.

Impact Management Actions	Implementati	on		Monitoring			
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of	
	person	implementation	implementation	person		compliance	
<ul> <li>Any blasting activity must be conducted by a suitably licensed blasting contractor; and</li> <li>Notification of surrounding landowners, emergency services site personnel of blasting activity 24 hours prior to such activity taking place on Site.</li> </ul>							

#### 5.22 Noise

Impact Management outcome: Prevent unnecessary noise to the environment by ensuring that noise from development activity is mitigated.								
Impact Management Actions	Implementati	ion	Monitoring					
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of		
	person	implementation	implementation	person		compliance		
- The Contractor must keep noise level within acceptable								
limits, Restrict the use of sound amplification equipment for								

	communication and emergency only;			
_	All vehicles and machinery must be fitted with appropriate			
	silencing technology and must be properly maintained;			
_	Any complaints received by the Contractor regarding noise			
	must be recorded and communicated. Where possible or			
	applicable, provide transport to and from the site on a daily			
	basis for construction workers;			
_	Develop a Code of Conduct for the construction phase in			
	terms of behaviour of construction staff. Operating hours as			
	determined by the environmental authorisation are adhered			
	to during the development phase. Where not defined, it			
	must be ensured that development activities must still meet			
	the impact management outcome related to noise			
	management.			
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#### 5.23 Fire prevention

Impact management outcome: Prevention of uncontrollable fires.
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					r		
Imp	Impact Management Actions		on	Monitoring			
		Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of
		person	implementation	implementation	person		compliance
_	Designate smoking areas where the fire hazard could be regarded as insignificant; Firefighting equipment must be available on all vehicles located on site;						
_	The local Fire Protection Agency (FPA) must be informed of construction activities;						
_	be communicated in environmental awareness training and displayed at a central location on site;						

- Two way swop of contact details between ECO and FPA.						
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#### 5.24 Stockpiling and stockpile areas

Impact management outcome: Reduce erosion and sedimentation as a result of stockpiling.									
Impact Management Actions	Implementati	on	Monitoring						
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of			
	person	implementation	implementation	person		compliance			
<ul> <li>All material that is excavated during the project development phase (either during piling (if required) or earthworks) must be stored appropriately on site in order to minimise impacts to watercourses, watercourses and water bodies;</li> <li>All stockpiled material must be maintained and kept clear of weeds and alien vegetation growth by undertaking regular weeding and control methods;</li> <li>Topsoil stockpiles must not exceed 2 m in height;</li> <li>During periods of strong winds and heavy rain, the stockpiles must be covered with appropriate material (e.g. cloth, tarpaulin etc.);</li> <li>Where possible, sandbags (or similar) must be placed at the bases of the stockpiled material in order to prevent erosion of the material.</li> </ul>									

#### 5.25 Civil works

Impact management outcome: Impact to the environment minimised during civil works to create the substation terrace.								
Impact Management Actions	Implementati	on				Monitoring		
	Responsible Method of Timeframe for			Responsible	Frequency	Evidence of		

		person	implementation	implementation	person	compliance
_ '	Where terracing is required, topsoil must be collected and					
1	retained for the purpose of re-use later to rehabilitate					
(	disturbed areas not covered by yard stone;					
- /	Areas to be rehabilitated include terrace embankments and					
(	areas outside the high voltage yards;					
_ `	Where required, all sloped areas must be stabilised to ensure					
I	proper rehabilitation is effected and erosion is controlled;					
	These areas can be stabilised using design structures or					
Ň	vegetation as specified in the design to prevent erosion of					
(	embankments. The contract design specifications must be					
(	adhered to and implemented strictly;					
-	Rehabilitation of the disturbed areas must be managed in					
(	accordance with Section 5.35: Landscaping and					
I	rehabilitation;					
- ,	All excess spoil generated during terracing activities must be					
(	disposed of in an appropriate manner and at a recognised					
I	landfill site; and					
- 3	Spoil can however be used for landscaping purposes and					
I	must be covered with a layer of 150 mm topsoil for					
1	rehabilitation purposes.					

#### 5.26 Excavation of foundation, cable trenching and drainage systems

Impact management outcome: No environmental degradation occurs as a result of excavation of foundation, cable trenching and drainage systems.

Impact Management Actions	Implementation			Monitoring			
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of	
	person	implementation	implementation	person		compliance	
- All excess spoil generated during foundation excavation							
must be disposed of in an appropriate manner and at a							

	licensed landfill site, if not used for backfilling purposes;			
_	Spoil can however be used for landscaping purposes and			
	must be covered with a layer of 150 mm topsoil for			
	rehabilitation purposes;			
_	Management of equipment for excavation purposes must			
	be undertaken in accordance with <b>Section 5.18: Workshop</b> ,			
	equipment maintenance and storage; and			
_	Hazardous substances spills from equipment must be			
	managed in accordance with Section 5.17: Hazardous			
	substances.			

#### 5.27 Installation of foundations, cable trenching and drainage systems

Impact management outcome: No environmental degradation occurs during the installation of foundation, cable trenching and drainage system.

Impact Management Actions	Implementation			Monitoring			
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of	
	person	implementation	implementation	person		compliance	
- Batching of cement to be undertaken in accordance with							
Section 5.19: Batching plants; and							
- Residual solid waste must be disposed of in accordance with							
Section 5.8: Solid waste and hazardous management.							

#### 5.28 Installation of equipment (circuit breakers, current Transformers, Isolators, Insulators, surge arresters, voltage transformers, earth switches)

Impact management outcome: No environmental degradation occurs as a result of installation of equipment. Monitoring **Impact Management Actions** Implementation Evidence of Responsible Method of Timeframe for Responsible Frequency implementation compliance implementation person person

_	Management of dust must be conducted in accordance			
	with Section 5. 20: Dust emissions;			
_	Management of equipment used for installation must be			
	conducted in accordance with Section 5.18: Workshop,			
	equipment maintenance and storage;			
_	Management hazardous substances and any associated			
	spills must be conducted in accordance with Section 5.17:			
	Hazardous substances; and			
_	Residual solid waste must be recycled or disposed of in			
	accordance with Section 5.8: Solid waste and hazardous			
	management.			

#### 5.29 Steelwork Assembly and Erection

Impact management outcome: No environmental degradation occurs as a result of steelwork assembly and erection.									
Impact Management Actions	Implementation			Monitoring					
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of			
	person	implementation	implementation	person		compliance			
<ul> <li>During assembly, care must be taken to ensure that no wasted/unused materials are left on site e.g. bolts and nuts</li> <li>Emergency repairs due to breakages of equipment must be managed in accordance with Section 5. 18: Workshop, equipment maintenance and storage and Section 5.16: Emergency procedures.</li> </ul>									

#### 5.30 Cabling and Stringing

Impact management outcome: No environmental degradation occurs as a result of stringing.			
Impact Management Actions	Implementation	Monitoring	

	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of
	person	implementation	implementation	person		compliance
- Residual solid waste (off cuts etc.) shall be recycled or						
disposed of in accordance with Section 6.8: Solid waste and						
hazardous Management;						
- Management of equipment used for installation shall be						
conducted in accordance with Section 5.18: Workshop,						
equipment maintenance and storage;						
<ul> <li>Management hazardous substances and any associated</li> </ul>						
spills shall be conducted in accordance with Section 5.17:						
Hazardous substances.						

#### 5.31 Testing and Commissioning (all equipment testing, earthing system, system integration)

Impact management outcome: No environmental degradation occurs as a result of Testing and Commissioning.						
Impact Management Actions	Implementation Monitoring					
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of
	person	implementation	implementation	person		compliance
- Residual solid waste must be recycled or disposed of in						
accordance with Section 5.8: Solid waste and hazardous						
management.						

#### 5.32 Socio-economic

mpact management outcome: enhanced socio-economic development.						
Impact Management Actions	Implementati	on		Monitoring		
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of
	person	implementation	implementation	person		compliance

	Develop and inclusion to compare the state of the			
_	Develop and implement communication strategies to			
	facilitate public participation;			
_	Develop and implement a collaborative and constructive			
	approach to conflict resolution as part of the external			
	stakeholder engagement process;			
_	Sustain continuous communication and liaison with			
	neighboring owners and residents			
_	Create work and training opportunities for local stakeholders;			
	and			
_	Where feasible, no workers, with the exception of security			
	personnel, must be permitted to stay over-night on the site.			
	This would reduce the risk to local farmers.			

#### 5.33 Temporary closure of site

Impact management outcome: Minimise the risk of environmental impact during periods of site closure greater than five days.

Impact Management Actions	Implementati	on		Monitoring		
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of
	person	implementation	implementation	person		compliance
- Bunds must be emptied (where applicable) and need to be						
undertaken in accordance with the impact management						
actions included in sections 5.17: Hazardous substances and						
5.18: Workshop, equipment maintenance and storage;						
<ul> <li>Hazardous storage areas must be well ventilated;</li> </ul>						
- Fire extinguishers must be serviced and accessible. Service						
records to be filed and audited at last service;						
– Emergency and contact details displayed must be						
displayed;						
- Security personnel must be briefed and have the facilities to						
contact or be contacted by relevant management and						

	emergency personnel;				
-	Night hazards such as reflectors, lighting, traffic signage etc.				
	must have been checked;				
_	Fire hazards identified and the local authority must have			1	
	been notified of any potential threats e.g. large brush			1	
	stockpiles, fuels etc.;				
_	Structures vulnerable to high winds must be secured;				
_	Wind and dust mitigation must be implemented;				
_	Cement and materials stores must have been secured;				
_	Toilets must have been emptied and secured;				
_	Refuse bins must have been emptied and secured;				
_	Drip trays must have been emptied and secured.				

#### 5.34 Dismantling of old equipment

Impact management outcome: Impact to the environment to be minimised during the dismantling, storage and disposal of old equipment commissioning.

Impact Management Actions	Implementati	Implementation			Monitoring		
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of	
	person	implementation	implementation	person		compliance	
- All old equipment removed during the project must be							
stored in such a way as to prevent pollution of the environment;							
<ul> <li>Oil containing equipment must be stored to prevent leaking or be stored on drip trays;</li> </ul>							
- All scrap steel must be stacked neatly and any disused and							
broken insulators must be stored in containers;							
- Once material has been scrapped and the contract has							
been placed for removal, the disposal Contractor must							
ensure that any equipment containing pollution causing							
substances is dismantled and transported in such a way as							

#### Dalmanutha Wind (Pty)Ltd Dalmanutha Hybrid Energy Facility

	to prevent spillage and pollution of the environment;			
_	The Contractor must also be equipped to contain and clean			
	up any pollution causing spills; and			
_	Disposal of unusable material must be at a licensed waste			
	disposal site.			

#### 5.35 Landscaping and rehabilitation

Impact management outcome: Areas disturbed during the development phase are returned to a state that approximates the original condition.

Impact Manag	jement Actions	Implementation			Monitoring		
		Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of
		person	implementation	implementation	person		compliance
– All areas	disturbed by construction activities must be subject						
to landsc	aping and rehabilitation; All spoil and waste must						
be dispos	ed of to a registered waste site;						
<ul> <li>All slopes</li> </ul>	must be assessed for contouring, and to contour						
only whe	en the need is identified in accordance with the						
Conserva	tion of Agricultural Resources Act, No 43 of 1983						
<ul> <li>All slopes</li> </ul>	must be assessed for terracing, and to terrace only						
when the	e need is identified in accordance with the						
Conserva	ition of Agricultural Resources Act, No 43 of 1983;						
<ul> <li>Berms tho</li> </ul>	at have been created must have a slope of 1:4 and						
be repla	nted with indigenous species and grasses that						
approxim	ates the original condition;						
<ul> <li>Where ne</li> </ul>	w access roads have crossed cultivated farmlands,						
that land	s must be rehabilitated by ripping which must be						
agreed to	b by the holder of the EA and the landowners;						
– Rehabilito	ation of access roads outside of farmland;						
– Indigenou	us species must be used for with species						
and/grass	ses to where it compliments or approximates the						

	original condition.			
_	Stockpiled topsoil must be used for rehabilitation (refer to			
	Section 5.24: Stockpiling and stockpiled areas):			
_	Stockpiled topsoil must be evenly spread so as to facilitate			
	seeding and minimise loss of soil due to erosion.			
_	Before placing topsoil, all visible weeds from the placement			
	area and from the topsoil must be removed:			
_	Subsoil must be ripped before topsoil is placed:			
_	The rehabilitation must be timed so that rehabilitation can			
	take place at the optimal time for vegetation establishment:			
_	Where impacted through construction related activity, all			
	sloped areas must be stabilised to ensure proper			
	rehabilitation is effected and erosion is controlled:			
_	Sloped areas stabilised using design structures or vegetation			
	as specified in the design to prevent erosion of			
	embankments. The contract design specifications must be			
	adhered to and implemented strictly;			
_	Spoil can be used for backfilling or landscaping as long as it			
	is covered by a minimum of 150 mm of topsoil.			
_	Where required, re-vegetation including hydro-seeding can			
	be enhanced using a vegetation seed mixture as described			
	below. A mixture of seed can be used provided the mixture			
	is carefully selected to ensure the following:			
	a) Annual and perennial plants are chosen;			
	b) Pioneer species are included;			
	c) Species chosen must be indigenous to the area with the			
	seeds used coming from the area;			
	d) Root systems must have a binding effect on the soil;			
	e) The final product must not cause an ecological			
	imbalance in the area			

#### 6 ACCESS TO THE GENERIC EMPr

Once completed and signed, to allow the public access to the generic EMPr, the holder of the EA must make the EMPr available to the public in accordance with the requirements of Regulation 26(h) of the EIA Regulations.

#### PART B: SECTION 2

#### 7 SITE SPECIFIC INFORMATION AND DECLARATION

#### 7.1 Sub-section 1: contact details and description of the project

7.1.1 Details of the applicant:

Name of Applicant :	Dalmanutha Wind (Pty) Ltd
Contact Person:	Mercia Grimbeek
Postal Address	Suite 104, Albion Springs, 183 Main Road, Rondebosch, Cape Town, South Africa 7700
Telephone:	+27 78 299 3515
Email:	Mercia.Grimbeek@enertrag.com / Mmakoena.Mmola@enertrag.com

#### Refer to Section 1.2 of the EMPr

7.1.2 Details and expertise of the EAP:

WSP was appointed in the role of Independent EAP to undertake the EIA processes for the proposed Dalmanutha Hybrid Energy Facility. The CV of the EAP is available in Appendix A. The EAP declaration of interest and undertaking is included in Appendix B.

#### EAP WSP GROUP AFRICA (PTY) LTD

Contact Person:	Ashlea Strong	
Physical Address:	Building C, Knightsbridge, 33 Sloane Street, Bryanston, Johannesburg	
Postal Address:	P.O. Box 98867, Sloane Park 2151, Johannesburg	
Telephone:	011 361 1392	
Fax:	011 361 1301	

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Appendix E: Generic EMPr Development of substation infrastructure - Dalmanutha Energy facility Substation

#### EAP WSP GROUP AFRICA (PTY) LTD

Email:

Ashlea.Strong@wsp.com

Refer to Section 1.3 of the EMPr

7.1.3 Project name:

#### Dalmanutha Hybrid Energy Facility, Belfast, Mpumalanga

7.1.4 Description of the project:

Refer to Section 3 of the EMPr

The proposed facility will have an IPP portion onsite substation of up to 4ha. The substation will consist of a high voltage substation yard to allow for multiple up to 132kV feeder bays and transformers, control building, telecommunication infrastructure, access road, etc.

7.1.5 Project location:

Refer to Section 3.1 of the EMPr

The proposed Dalmanutha WEF will have a project area of approximately 9 197 hectares (ha). Within this project area the extent of the buildable area will be approximately 400 ha subject to finalization based on technical and environmental requirements.

The proposed Dalmanutha Hybrid Energy Facility is located south-east of Belfast in Mpumalanga and falls within the jurisdiction of the Emakhazeni and Albert Luthuli Local Municipalities, Nkangala and Gert Sibande District municipalities.



Figure 0-1: Proposed Project Infrastructure

#### 7.2 Sub-section 2: Development footprint site map

This sub-section must include a map of the site sensitivity overlaid with the preliminary infrastructure layout. The sensitivity map must be prepared from the national web based

Appendix E: Generic EMPr Development of substation infrastructure – Dalmanutha Energy facility Substation

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environmental screening tool, when available for compulsory use at: <u>https://screening.environment.gov.za/screeningtool</u>. The sensitivity map shall identify the nature of each sensitive feature e.g. threatened plant species, archaeological site, etc. Sensitivity maps shall identify features both within the planned working area and any known sensitive features within 50 m from the development footprint.

Refer to Section 3.4 of the EMPr

The Table 0-1 below indicates the sensitivities identified by the screening tool and the specialist verification of those sensitivities in the area of the substation.

#### Table 0-1 - Assessment Protocols and Site Sensitivity Verifications

Specialist Assessment	Assessment Protocol	DFFE Screening Tool Sensitivity (WEF)	DFFE Screening Tool Sensitivity (SEF)	Specialist Sensitivity Verification
Agricultural Compliance Statement	Protocol for the specialist assessment and minimum report content requirements of environmental impacts on agricultural resources by onshore wind and/or solar photovoltaic energy generation facilities where the electricity output is 20 megawatts or more	High and Medium Sensitivity	High and Medium Sensitivity	High and Low Sensitivity
Terrestrial Biodiversity Impact Assessment	Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Terrestrial Biodiversity	High Sensitivity	High Sensitivity	High Sensitivity
Aquatic Biodiversity Impact Assessment	Protocol for the Specialist Assessment and Minimum Report Content Requirements	High and Low Sensitivity	High and Low Sensitivity	High to Very High Sensitivity for Wetlands

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Appendix E: Generic EMPr Development of substation infrastructure - Dalmanutha Energy facility Substation

Specialist Assessment	Assessment Protocol	DFFE Screening Tool Sensitivity (WEF)	DFFE Screening Tool Sensitivity (SEF)	Specialist Sensitivity Verification
	for Environmental Impacts on Aquatic Biodiversity			
Plant Species	Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Terrestrial Plant Species	Medium and Low Sensitivity	Medium and Low Sensitivity	Medium Sensitivity
Animal Species	Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Terrestrial Animal Species	High and Medium Sensitivity	High and Medium Sensitivity	High- Medium Sensitivity
Bats Site Sensitivity Verification Requirements where a specialist Assessment is required but no Specific Assessment Protocol has been prescribed		High Sensitivity	N/A	High to Medium Sensitivity
Avifauna Impact Assessment	Protocol for the Specialist Assessment and Minimum Report Content Requirements	Low Sensitivity	Low Sensitivity	Very High Sensitivity

Specialist Assessment	Assessment Protocol	DFFE Screening Tool Sensitivity (WEF)	DFFE Screening Tool Sensitivity (SEF)	Specialist Sensitivity Verification
	for Environmental Impacts on Terrestrial Animal Species			
Archaeological and CulturalSite SensitivityHeritageVerificationHeritageRequirementsImpactwhere aAssessmentspecialistAssessmentAssessment isrequired but noSpecificAssessmentProtocol hasbeen prescribed		Low Sensitivity	Low Sensitivity	Low with isolated points as High Sensitivity
Palaeontology Impact Assessment	Site Sensitivity Verification Requirements where a specialist Assessment is required but no Specific Assessment Protocol has been prescribed	Very High and High Sensitivity	Very High and High Sensitivity	Low Sensitivity
Visual (Landscape) Impact Assessment	Site Sensitivity Verification Requirements where a specialist Assessment is required but no Specific Assessment Protocol has been prescribed	Very High Sensitivity	Very High Sensitivity	High Sensitivity
Flicker Assessment	Site Sensitivity Verification Requirements where a specialist Assessment is	High and Low Sensitivity	N/A	High Sensitivity

Specialist Assessment	Assessment Protocol	DFFE Screening Tool Sensitivity (WEF)	DFFE Screening Tool Sensitivity (SEF)	Specialist Sensitivity Verification
	required but no Specific Assessment Protocol has been prescribed			
Noise Assessment	Protocol for Specialist Assessment and Minimum Report Content requirements for Noise Impacts	High and Low Sensitivity	N/A	Medium to Low Sensitivity
Civil Aviation Assessment	Site Sensitivity Verification Requirements where a specialist Assessment is required but no Specific Assessment Protocol has been prescribed	High Sensitivity	Low Sensitivity	Low Sensitivity
Defence Assessment	Site Sensitivity Verification Requirements where a specialist Assessment is required but no Specific Assessment Protocol has been prescribed	Low Sensitivity	Low Sensitivity	Low Sensitivity
RFI Assessment	Site Sensitivity Verification Requirements where a specialist Assessment is required but no Specific Assessment Protocol has	Low Sensitivity	Low Sensitivity	Low Sensitivity

Specialist Assessment	Assessment Protocol	DFFE Screening Tool Sensitivity (WEF)	DFFE Screening Tool Sensitivity (SEF)	Specialist Sensitivity Verification
	been prescribed			



#### Figure 0-2: Overall Site Sensitivity

#### 7.3 Sub-section 3: Declaration

The proponent/applicant or holder of the EA affirms that he/she will abide and comply with the prescribed impact management outcomes and impact management actions as stipulated in part B: section 1 of the generic EMPr and have the understanding that the impact management outcomes and impact management actions are legally binding. The proponent/applicant or holder of the EA affirms that he/she will provide written notice to the CA 14 day prior to the date on which the activity will commence of commencement of construction to facilitate compliance inspections.

Signature Proponent/applicant/ holder of EA

Date:

#### To be signed in the Final Report

\_\_\_\_\_

#### 7.4 Sub-section 4: amendments to site specific information (Part B; section 2)

Should the EA be transferred to a new holder, <u>Part B: Section 2</u> must be completed by the new holder and submitted with the application for an amendment of the EA in terms of Regulations 29 or 31 of the EIA Regulations, whichever applies. The information submitted for an amendment to an environmental authorisation will be considered to be incomplete should a signed copy of <u>Part B: Section 2</u> not be submitted. Once approved, <u>Part B: Section 2</u> forms part of the EMPr for the development and the EMPr becomes legally binding to the new EA holder.

#### PART C

#### 8 SITE SPECIFIC ENVIRONMENTAL ATTRIBUTES

If any specific environmental sensitivities/attributes are present on the site which require more specific impact management outcomes and actions, not included in the pre-approved generic EMPr template, to manage impacts, those impact management outcomes and impact management actions must be included in this section. These specific management controls must be referenced spatially, and must include impact management outcomes and impact management actions. The management controls including impact management outcomes and impact management actions must be presented in the format of the preapproved generic EMPr template. This applies only to additional impact management outcomes and impact management actions that are necessary.

If <u>Part C</u> is applicable to the development as authorised in the EA, it is required to be submitted to the CA together with the BAR or EIAR, for consideration of, and decision on, the application for EA. The information in this section must be prepared by an EAP and the name and expertise of the EAP, including the curriculum vitae are to be included. Once approved, <u>Part C</u> forms part of the EMPr for the site and is legally binding.

This section will **not be required** should the site contain no specific environmental sensitivities or attributes.

#### NOT REQUIRED

No Environmental Sensitivities Identified within the Substation Site Footprint refer to the combined sensitivity map (Figure 0-2)

#### **APPENDIX 1: METHOD STATEMENTS**

To be prepared by the contractor prior to commencement of the activity. The method statements are **not required** to be submitted to the CA.

# **Appendix E**

# **OHPL GENERIC EMPR**

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## APPENDIX 1

### GENERIC ENVIRONMENTAL MANAGEMENT PROGRAMME (EMPr) FOR THE DEVELOPMENT AND EXPANSION FOR OVERHEAD ELECTRICITY TRANSMISSION AND DISTRIBUTION INFRASTRUCTURE





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#### INTRODUCTION

#### 1. Background

The National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) requires that an environmental management programme (EMPr) be submitted where an environmental impact assessment (EIA) has been identified as the environmental instrument to be utilised as the basis for a decision on an application for environmental authorisation (EA). The content of an EMPr must either contain the information set out in Appendix 4 of the Environmental Impact Assessment Regulations, 2014, as amended, (EIA Regulations) or must be a generic EMPr relevant to an application as identified and gazetted by the Minister in a government notice. Once the Minister has identified, through a government notice, that a generic EMPr is relevant to an application for EA, that generic EMPr must be applied by all parties involved in the EA process, including, but not limited to, the applicant and the competent authority (CA).

#### 2. Purpose

This document constitutes a generic EMPr relevant to applications for the development or expansion of overhead electricity transmission and distribution infrastructure, and all listed and specified activities necessary for the realisation of such infrastructure.

#### 3. Objective

The objective of this generic EMPr is to prescribe and pre-approve generally accepted impact management outcomes and impact management actions, which can commonly and repeatedly be used for the avoidance, management and mitigation of impacts and risks associated with the development or expansion of overhead electricity transmission and distribution infrastructure. The use of a generic EMPr is intended to reduce the need to prepare and review individual EMPrs for applications of a similar nature.

#### 4. Scope

The scope of this generic EMPr applies to the development or expansion of overhead electricity transmission and distribution infrastructure requiring EA in terms of NEMA, i.e. with a capacity of 33 kilovolts or more. This generic EMPr applies to activities requiring EA, mainly activity 11 and 47 of the Environmental Impact Assessment Regulations Listing Notice 1 of 2014, as amended, and activity 9 of the Environmental Impact Assessment Regulations Listing Notice 2 of 2014, as amended, and all associated listed or specified activities necessary for the realisation of such infrastructure.

#### 5. Structure of this document

This document is structured in three parts with an Appendix as indicated in the table below:

Part	Section	Heading		Content
A		Provides guidance information and <b>legally binding</b>	general and is <b>not</b>	Definitions, acronyms, roles & responsibilities and documentation and reporting.
В	1	Pre-approved	generic	Contains generally accepted impact

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Appendix D: Generic EMPr Development of overhead powerline infrastructure – Dalmanutha 132kV Substation Connection

Part	Section	Heading	Content
		EMPr template	management outcomes and impact management actions required for the avoidance, management and mitigation of impacts and risks associated with the development or expansion of overhead electricity transmission and distribution infrastructure, which are presented in the form of a template that has been pre-approved.
			The template in this section is to be completed by the contractor, with each completed page signed and dated by the holder of the EA prior to commencement of the activity.
			Where an impact management outcome is not relevant, the words "not applicable" can be inserted in the template under the "responsible persons" column.
			Once completed and signed, the template represents the EMPr for the activity approved by the CA and is legally binding. The template <b>is</b> <b>not required</b> to be submitted to the CA as once the generic EMPr is gazetted for implementation, it has been approved by the CA.
			To allow interested and affected parties access to the pre-approved EMPr template for consideration through the decision-making process, the EAP on behalf of the applicant /proponent must make the hard copy of this EMPr available at a public location and where the applicant has a website, the EMPr should also be made available on such publicly accessible website.
	2	Site specific information	Contains preliminary infrastructure layout and a declaration that the applicant/holder of the EA will comply with the pre-approved generic EMPr template contained in <u>Part B: Section 1</u> , and understands that the impact management actions are <b>legally binding</b> . The preliminary infrastructure layout must be finalized to inform the final EMPr that is to be submitted with the basic assessment report (BAR) or environmental impact assessment report (EIAR), ensuring that all impact management outcomes and actions have been either pre-approved or approved in terms of <u>Part C</u> .
Part	Section	Heading	Content
------	---------	--	--
			This section <b>must be</b> submitted to the CA together with the final BAR or EIAR. The information submitted to the CA will be considered to be incomplete should a signed copy of <u>Part B: section 2</u> not be submitted. Once approved, this Section forms part of the EMPr for the development and is legally binding.
C		Site specific sensitivities/ attributes	If any specific environmental sensitivities/ attributes are present on the site which require site specific impact management outcomes and impact management actions, not included in the pre-approved generic EMPr, to manage impacts, these specific impact management outcomes and impact management actions must be included in this section. These specific environmental attributes must be referenced spatially and impact management outcomes and impact management outcomes and impact management actions must be provided. These specific impact management outcomes and impact management actions must be presented in the format of the pre- approved EMPr template (Part B: section 1) This section will not be required should the site contain no specific environmental sensitivities or attributes. However, if <u>Part C</u> is applicable to the site, it <b>is required</b> to be submitted together with the BAR or EIAR, for consideration of, and decision on, the application for EA. The information in this section must be prepared by an EAP, and must contain his/her name and expertise including a curriculum vitae. Once approved, Part C forms part of the EMPr for the site and is legally binding. This section applies only <b>to additional</b> impact management actions that are necessary for the avoidance, management and mitigation of impacts and risks associated with the specific development or expansion and which are not already included in <u>Part B: section 1</u> .
Арре	endix 1		Contains the method statements to be prepared prior to commencement of the
			activity. The method statements are <b>not required</b> to be submitted to the competent authority.

## 6. Completion of part B: section 1: the pre-approved generic EMPr template

The template is to be completed prior to commencement of the activity, by providing the following information for each environmental impact management action:

- For implementation
  - a 'responsible person',
  - a method for implementation,
  - a timeframe for implementation
- For monitoring
  - a responsible person
  - frequency
  - evidence of compliance.

The completed template must be signed and dated by the holder of the EA prior to commencement of the activity. The method statements prepared and agreed to by the holder of the EA must be appended to the template as <u>Appendix 1</u>. Each method statement must be signed and dated on each page by the holder of the EA. This template, once signed and dated, is legally binding. The holder of the EA will remain responsible for its implementation.

## 7. Amendments of the impact management outcomes and impact management actions

Once the activity has commenced, a holder of an EA may make amendments to the impact management outcomes and impact management actions in the following manner:

- Amendment of the impact management outcomes: in line with the process contemplated in regulation 37 of the EIA Regulations; and
- Amendment of the impact management actions: in line with the process contemplated in regulation 36 of the EIA Regulations.

# 8. Documents to be submitted as part of part B: section 2 site specific information and declaration

<u>Part B: Section 2</u> has three distinct sub-sections. The first and third sub-sections are in a template format. Sub-section two requires a map to be produced.

<u>Sub-section 1</u> contains the project name, the applicant's name and contact details, the site information, which includes coordinates of the corridor in which the proposed overhead electricity transmission and distribution infrastructure is proposed as well as the 21-digit Surveyor General code of each cadastral land parcel and, where available, the farm name.

Sub-section 2 is to be prepared by an EAP and must contain his/her name and expertise including a curriculum vitae. This sub-section must include a map of the site sensitivity overlaid with the preliminary infrastructure layout using the national web based environmental screening tool, when available for compulsory use at: https://screening.environment.gov.za/screeningtool. The sensitivity map shall identify the nature of each sensitive feature e.g. raptor nest, threatened plant species, archaeological site, etc. Sensitivity maps must identify features both within the planned working area and any known sensitive features in the surrounding landscape within 50m from the development footprint. The overhead transmission and distribution profile must be illustrated at an appropriate resolution to enable fine scale interrogation. It is recommended that <20 km of overhead transmission and distribution length is illustrated per page in A3 landscape format. Where considered appropriate, photographs of sensitive features in the context of tower positions must be used.

<u>Sub-section 3</u> is the declaration that the applicant/proponent or holder of the EA in the case of a change of ownership must complete, which confirms that the applicant/EA holder will comply with the pre-approved generic EMPr template in <u>Section 1</u> and understands that the impact management outcomes and actions are legally binding.

## (a) Amendments to Part B: Section 2 – site specific information and declaration

Should the EA be transferred, <u>Part B: Section 2</u> must be completed by the new applicant/proponent and submitted with the application for an amendment of the EA in terms of Regulations 29 or 31 of the EIA Regulations, whichever applies. The information submitted as part of such an application for an amendment to an EA will be considered to be incomplete should a signed copy of <u>Part B: Section 2</u> not be submitted. Once approved, <u>Part B: Section 2</u> forms part of the EMPr for the development and the EMPr becomes legally binding to the new EA holder.

## PART A – GENERAL INFORMATION

## 1. **DEFINITIONS**

In this EMPr any word or expression to which a meaning has been assigned in the NEMA or EIA Regulations has that meaning, and unless the context requires otherwise –

"clearing" means the clearing and removal of vegetation, whether partially or in whole, including trees and shrubs, as specified;

"construction camp" is the area designated for key construction infrastructure and services, including but not limited to offices, overnight vehicle parking areas, stores, the workshop, stockpile and lay down areas, hazardous storage areas (including fuels), the batching plant (if one is located at the construction camp), designated access routes, equipment cleaning areas and the placement of staff accommodation, cooking and ablution facilities, waste and wastewater management;

"contractor" - The Contractor has overall responsibility for ensuring that all work, activities, and actions linked to the delivery of the contract, are in line with the Environmental Management Programme and that Method Statements are implemented as described.

"hazardous substance" is a substance governed by the Hazardous Substances Act, 1973 (Act No. 15 of 1973) as well as the Hazardous Chemical and Substances Regulations, 1995;

"method statement" means a written submission by the Contractor to the Project Manager in response to this EMPr or a request by the Project Manager and ECO. The method statement must set out the equipment, materials, labour and method(s) the Contractor proposes using to carry out an activity identified by the Project Manager when requesting the Method Statement. This must be done in such detail that the Project Manager and ECO is able to assess whether the Contractor's proposal is in accordance with this specification and/or will produce results in accordance with this specification;

The method statement must cover applicable details with regard to:

- (i) Construction procedures;
- (ii) Plant, materials and equipment to be used;
- (iii) Transporting the equipment to and from site;
- (iv) How the plant/ material/ equipment will be moved while on site;
- (v) How and where the plant/ material/ equipment will be stored;
- (vi) The containment (or action to be taken if containment is not possible) of leaks or spills of any liquid or material that may occur;
- (vii) Timing and location of activities;
- (viii) Compliance/ non-compliance; and
- (ix) Any other information deemed necessary by the Project Manager.

"slope" means the inclination of a surface expressed as one unit of rise or fall for so many horizontal units;

"solid waste" means all solid waste, including construction debris, hazardous waste, excess cement/ concrete, wrapping materials, timber, cans, drums, wire, nails, food and domestic waste (e.g. plastic packets and wrappers);

**"spoil**" means excavated material which is unsuitable for use as material in the construction works or is material which is surplus to the requirements of the construction works;

**"topsoil"** means a varying depth (up to 300 mm) of the soil profile irrespective of the fertility, appearance, structure, agricultural potential, fertility and composition of the soil; and

"works" means the works to be executed in terms of the Contract

# 2. ACRONYMS and ABBREVIATIONS

CA	Competent Authority
cEO	Contractors Environmental Officer
dEO	Developer Environmental Officer
DPM	Developer Project Manager
DSS	Developer Site Supervisor
EAR	Environmental Audit Report
ECA	Environmental Conservation Act No. 73 of 1989
ECO	Environmental Control Officer
EA	Environmental Authorisation
EIA	Environmental Impact Assessment
ERAP	Emergency Response Action Plan
EMPr	Environmental Management Programme Report
EAP	Environmental Assessment Practitioner
FPA	Fire Protection Agency
HCS	Hazardous chemical Substance
NEMA	National Environmental Management Act, 1998 (Act No. 107 of 1998)
NEMBA	National Environmental Management: Biodiversity Act ,2004 (Act No. 10 of 2004)
NEMWA	National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008)
MSDS	Material Safety Data Sheet
RI&AP's	Registered interested and affected parties

## 3. ROLES AND RESPONSIBILITIES FOR ENVIRONMENTAL MANAGEMENT PROGRAMME (EMPr) IMPLEMENTATION

The effective implementation of this generic EMPr is dependent on established and clear roles, responsibilities and reporting lines within an institutional framework. This section of the EMPr gives guidance to the various environmental roles and reporting lines, however, project specific requirements will ultimately determine the need for the appointment of specific person(s) to undertake specific roles and or responsibilities. As such, it must be noted that in the event that no specific person, for example, an environmental control officer (ECO) is appointed, the holder of the EA remains responsible for ensuring that the duties indicated in this document for action by the ECO are undertaken.

Responsible Person (s)	Role and Responsibilities
Developer's Project Manager (DPM)	<u>Role</u> The Project Developer is accountable for ensuring compliance with the EMPr and any conditions of approval from the competent authority (CA). Where required, an environmental control officer (ECO) must be contracted by the Project Developer to objectively monitor the implementation of the EMPr according to relevant environmental legislation, and the conditions of the environmental authorisation (EA). The Project Developer is further responsible for providing and giving mandate to enable the ECO to perform responsibilities, and he must ensure that the ECO is integrated as part of the project team while remaining independent.
	<ul> <li>Responsibilities <ul> <li>Be fully conversant with the conditions of the EA;</li> <li>Ensure that all stipulations within the EMPr are communicated and adhered to by the Developer and its Contractor(s);</li> <li>Issuing of site instructions to the Contractor for corrective actions required;</li> <li>Monitor the implementation of the EMPr throughout the project by means of site inspections and meetings. Overall management of the project and EMPr implementation; and</li> <li>Ensure that periodic environmental performance audits are undertaken on the project implementation.</li> </ul> </li> </ul>
Developer Site Supervisor (DSS)	Role The DSS reports directly to the DPM, oversees site works, liaises with the contractor(s) and the ECO. The DSS is responsible for the day to day implementation of the EMPr and for ensuring the compliance of all contractors with the conditions and requirements stipulated in the EMPr.

 Table 0-1: Guide to roles and responsibilities for implementation of an EMPr

Responsible Person (s)	Role and Responsibilities
	<ul> <li><u>Responsibilities</u> <ul> <li>Ensure that all contractors identify a contractor's Environmental Officer (cEO);</li> <li>Must be fully conversant with the conditions of the EA. Oversees site works, liaison with Contractor, DPM and ECO;</li> <li>Must ensure that all landowners have the relevant contact details of the site staff, ECO and cEO;</li> <li>Issuing of site instructions to the Contractor for corrective actions required;</li> <li>Will issue all non-compliances to contractors; and</li> <li>Ratify the Monthly Environmental Report.</li> </ul> </li> </ul>
Environmental Control Officer (ECO)	Role The ECO should have appropriate training and experience in the implementation of environmental management specifications. The primary role of the ECO is to act as an independent quality controller and monitoring agent regarding all environmental concerns and associated environmental impacts. In this respect, the ECO is to conduct periodic site inspections, attend regular site meetings, pre-empt problems and suggest mitigation and be available to advise on incidental issues that arise. The ECO is also required to conduct compliance audits, verifying the monitoring reports submitted by the cEO. The ECO provides feedback to the DSS and Project Manager regarding all environmental matters. The Contractor, cEO and dEO are answerable to the Environmental Control Officer for non- compliance with the Performance Specifications as set out in the EA and EMPr.
	The ECO provides feedback to the DSS and Project Manager, who in turn reports back to the Contractor and potential and Registered Interested &Affected Parties' (RI&AP's), as required. Issues of non- compliance raised by the ECO must be taken up by the Project Manager, and resolved with the Contractor as per the conditions of his contract. Decisions regarding environmental procedures, specifications and requirements which have a cost implication (i.e. those that are deemed to be a variation, not allowed for in the Performance Specification) must be endorsed by the Project Manager. The ECO must also, as specified by the EA, report to the relevant CA as and when required.
	Responsibilities         The responsibilities of the ECO will include the following:         -       Be aware of the findings and conclusions of all EA related to the development;         -       Be familiar with the recommendations and mitigation measures of this EMPr;

Responsible Person (s)	Role and Responsibilities
	<ul> <li>Be conversant with relevant environmental legislation, policies and procedures, and ensure compliance with them;</li> <li>Undertake regular and comprehensive site inspections / audits of the construction site according to the generic EMPr and applicable licenses in order to monitor compliance as required;</li> <li>Educate the construction team about the management measures contained in the EMPr and environmental licenses;</li> <li>Compilation and administration of an environmental monitoring plan to ensure that the environmental management measures are implemented and are effective;</li> <li>Monitoring the performance of the Contractors and ensuring compliance with the EMPr and associated Method Statements;</li> <li>In consultation with the Developer Site Supervisor order the removal of person(s) and/or equipment which are in contravention of the specifications of the EMPr and/or environmental licenses;</li> <li>Liaison between the DPM, Contractors, authorities and other lead stakeholders on all environmental concerns;</li> <li>Compile a regular environmental audit report highlighting any non-compliance issues as well as satisfactory or exceptional compliance with the EMPr;</li> <li>Validating the regular site inspection reports, which are to be prepared by the contractor Environmental Officer (CEO);</li> <li>Checking the cEO's public compliants register in which all complaints are recorded, as well as action taken;</li> <li>Assisting in the resolution of conflicts;</li> <li>Facilitate training for all personnel on the site – this may range from carrying out the training, to reviewing the training programmes of the Contractor;</li> <li>In case of non-compliances, the ECO must first communicate this to the Senior Site Supervisor, who has the power to ensure this matter to the authorities as non-compliance;</li> <li>Maintenance, update and review of the EMPr;</li> </ul>
developer Environmental Officer	Role
(dEO)	The dEOs will report to the Project Manager and are responsible for implementation of the EMPr, environmental monitoring and reporting, providing environmental input to the Project Manager and Contractor's Manager, liaising with contractors and the landowners as well as a range of environmental

Responsible Person (s)	Role and Responsibilities
	<ul> <li>coordination responsibilities.</li> <li><u>Responsibilities</u> <ul> <li>Be fully conversant with the EMPr;</li> <li>Be familiar with the recommendations and mitigation measures of this EMPr, and implement these measures;</li> <li>Ensure that all stipulations within the EMPr are communicated and adhered to by the Employees, Contractor(s);</li> <li>Confine the development site to the demarcated area;</li> <li>Conduct environmental internal audits with regards to EMPr and authorisation compliance (on cEO);</li> <li>Assist the contractors in addressing environmental challenges on site;</li> <li>Assist in incident management:</li> <li>Reporting environmental incidents to developer and ensuring that corrective action is taken, and lessons learnt shared;</li> <li>Assist the contractor in investigating environmental incidents and compile investigation reports;</li> <li>Follow-up on pre-warnings, defects, non-conformance reports;</li> <li>Measure and communicate environmental performance to the Contractor;</li> <li>Conduct environmental awareness training on site together with ECO and cEO;</li> <li>Ensure that the necessary legal permits and / or licenses are in place and up to date;</li> <li>Acting as Developer's Environmental Representative on site and work together with the ECO and contractor;</li> </ul> </li> </ul>
Contractor	Role The Contractor appoints the cEO and has overall responsibility for ensuring that all work, activities, and actions linked to the delivery of the contract are in line with the EMPr and that Method Statements are implemented as described. External contractors must ensure compliance with this EMPr while performing the onsite activities as per their contract with the Project Developer. The contractors are required, where specified, to provide Method Statements setting out in detail how the impact management actions contained in the EMPr will be implemented during the development or expansion for overhead electricity transmission and distribution infrastructure activities.

Responsible Person (s)	Role and Responsibilities
	Responsibilities         -       project delivery and quality control for the development services as per appointment;         -       employ a suitably qualified person to monitor and report to the Project Developer's appointed person on the daily activities on-site during the construction period;         -       ensure that safe, environmentally acceptable working methods and practices are implemented and that equipment is properly operated and maintained, to facilitate proper access and enable any operation to be carried out safely;         -       attend on site meeting(s) prior to the commencement of activities to confirm the procedure and designated activity zones;         -       ensure that contractors' staff repair, at their own cost, any environmental damage as a result of a contravention of the specifications contained in EMPr, to the satisfaction of the ECO.
contractor Environmental Officer (cEO)	Role Each Contractor affected by the EMPr should appoint a cEO, who is responsible for the on-site implementation of the EMPr (or relevant sections of the EMPr). The Contractor's representative can be the site agent; site engineer; a dedicated environmental officer; or an independent consultant. The Contractor must ensure that the Contractor's Representative is suitably qualified to perform the necessary tasks and is appointed at a level such that she/he can interact effectively with other site Contractors, labourers, the Environmental Control Officer and the public. As a minimum the cEO shall meet the following criteria:
	<ul> <li>Responsibilities</li> <li>Be on site throughout the duration of the project and be dedicated to the project;</li> <li>Ensure all their staff are aware of the environmental requirements, conditions and constraints with respect to all of their activities on site;</li> <li>Implementing the environmental conditions, guidelines and requirements as stipulated within the EA, EMPr and Method Statements;</li> <li>Attend the Environmental Site Meeting;</li> <li>Undertaking corrective actions where non-compliances are registered within the stipulated timeframes;</li> <li>Report back formally on the completion of corrective actions;</li> <li>Assist the ECO in maintaining all the site documentation;</li> </ul>

Responsible Person (s)	Role and Responsibilities
	<ul> <li>Prepare the site inspection reports and corrective action reports for submission to the ECO;</li> <li>Assist the ECO with the preparing of the monthly report; and</li> <li>Where more than one Contractor is undertaking work on site, each company appointed as a Contractor will appoint a cEO representing that company.</li> </ul>

# 4. ENVIRONMENTAL DOCUMENTATION REPORTING AND COMPLIANCE

To ensure accountable and demonstrated implementation of the EMPr, a number of reporting systems, documentation controls and compliance mechanisms must be in place for all overhead electricity transmission and distribution infrastructure projects as a minimum requirement.

#### 4.1 Document control/Filing system

The holder of the EA is solely responsible for the upkeep and management of the EMPr file. At a minimum, all documentation detailed below will be stored in the EMPr file. A hard copy of all documentation shall be filed, while an electronic copy may be kept where relevant. A duplicate file will be maintained in the office of the DSS (where applicable). This duplicate file must remain current and up-to-date. The filing system must be updated and relevant documents added as required. The EMPr file must be made available at all times on request by the CA or other relevant authorities. The EMPr file will form part of any environmental audits undertaken as prescribed in the EIA Regulations.

4.2 Documentation to be available

At the outset of the project the following preliminary list of documents shall be placed in the filing system and be accessible at all times:

- Full copy of the signed EA from the CA in terms of NEMA, granting approval for the development or expansion;
- Copy of the generic and site specific EMPr as well as any amendments thereof;
- Copy of declaration of implementing generic EMPr and subsequent approval of site specific EMPr and amendments thereof;
- All method statements;
- Completed environmental checklists;
- Minutes and attendance register of environmental site meetings;
- An up-to-date environmental incident log;
- A copy of all instructions or directives issued;
- A copy of all corrective actions signed off. The corrective actions must be filed in such a way that a clear reference is made to the non-compliance record;
- Complaints register.

#### 4.3 Weekly Environmental Checklist

The ECOs are required to complete a Weekly Environmental Checklist, the format of which is to be agreed prior to commencement of the activity. The ECOs are required to sign and date the checklist, retain a copy in the EMPr file and submit a copy of the completed checklist to the DSS on a weekly basis.

The checklists will form the basis for the Monthly Environmental Reports. Copies of all completed checklists will be attached as Annexures to the Environmental Audit Report as required in terms of the EIA Regulations.

#### 4.4 Environmental site meetings

Minutes of the environmental site meetings shall be kept. The minutes must include an attendance register and will be attached to the Monthly Report that is distributed to

attendees. Each set of minutes must clearly record "Matters for Attention" that will be reviewed at the next meeting.

4.5 Required Method Statements

The method statement will be done in such detail that the ECOs are enabled to assess whether the contractor's proposal is in accordance with the EMPr.

The method statement must cover applicable details with regard to:

- development procedures;
- materials and equipment to be used;
- getting the equipment to and from site;
- how the equipment/ material will be moved while on site;
- how and where material will be stored;
- the containment (or action to be taken if containment is not possible) of leaks or spills of any liquid or material that may occur;
- timing and location of activities;
- compliance/ non-compliance with the EMPr; and
- any other information deemed necessary by the ECOs.

Unless indicated otherwise by the Project Manager, the Contractor shall provide the following method statements to the Project Manager no less than 14 days prior to the commencement date of the activity:

- Site establishment Camps, Lay-down or storage areas, satellite camps, infrastructure;
- Batch plants;
- Workshop or plant servicing;
- Handling, transport and storage of Hazardous Chemical Substance's;
- Vegetation management Protected, clearing, aliens, felling;
- Access management Roads, gates, crossings etc.;
- Fire plan;
- Waste management transport, storage, segregation, classification, disposal (all waste streams);
- Social interaction complaints management, compensation claims, access to properties etc.;
- Water use (source, abstraction and disposal), access and all related information, crossings and mitigation;
- Emergency preparedness Spills, training, other environmental emergencies;
- Dust and noise management methodologies;
- Fauna interaction and risk management only if the risk was identified wildlife interaction especially on game farms; and
- Heritage and palaeontology management.

The ECOs shall monitor and ensure that the contractors perform in accordance with these method statements. Completed and agreed method statements between the holder of the EA and the contractor shall be captured in Appendix 1.

4.6 Environmental Incident Log (Diary)

The ECOs are required to maintain an up-to-date and current Environmental Incident Log (environmental diary). The Environmental Incident Log is a means to record all environmental incidents and/or all non-compliance notice would not be issued. An environmental incident is defined as:

- Any deviation from the listed impact management actions (listed in this EMPr) that may be addressed immediately by the ECOs. (For example a contractor's staff member littering or a drip tray that has not been emptied);
- Any environmental impact resulting from an action or activity by a contractor in contravention of the environmental stipulations and guidelines listed in the EMPr which as a single event would have a minor impact but which if cumulative and continuous would have a significant effect (for example no toilet paper available in the ablutions for an afternoon); and
- General environmental information such as road kills or injured wildlife.

The ECOs are to record all environmental incidents in the Environmental Incident Log. All incidents regardless of severity must be reported to the Developer. The Log is to be kept in the EMPr file and at a minimum the following will be recorded for each environmental incident:

- The date and time of the incident;
- Description of the incident;
- The name of the Contractor responsible;
- The incident must be listed as significant or minor;
- If the incident is listed as significant, a non-compliance notice must be issued, and recorded in the log;
- Remedial or corrective action taken to mitigate the incident; and
- Record of repeat minor offences by the same contractor or staff member.

The Environmental Incident Log will be captured in the EAR.

# 4.7 Non-compliance

A non-compliance notice will be issued to the responsible contractor by the ECOs via the DSS or Project Manager. The non-compliance notice will be issued in writing; a copy filed in the EMPr file and will at a minimum include the following:

- Time and date of the non-compliance;
- Name of the contractor responsible;
- Nature and description of the non-compliance;
- Recommended / required corrective action; and
- Date by which the corrective action to be completed.
- The contractors shall act immediately when a notice of non-compliance is received and correct whatever is the cause for the issuing of the notice. Complaints received regarding activities on the development site pertaining to the environment shall be recorded in a dedicated register and the response noted with the date and action taken. The ECO should be made aware of any complaints. Any noncompliance with the agreed procedures of the EMPr is a transgression of the various statutes and laws that define the manner by which the environment is managed. Failure to redress the cause shall be reported to the relevant CA for them to deal with the transgression, as it deems fit. The contractor is deemed not to have complied with the EMPr if, inter alia, There is a deviation from the environmental conditions, impact management outcomes and impact management actions , as approved in generic and site specific EMPr as relevant as set out in the EMPr, which deviation has, or may cause, an environmental impact.

# 4.8 Corrective action records

For each non-compliance notice issued, a documented corrective action must be recorded. On receiving a non-compliance notice from the DSS, the contractor's cEO will ensure that the corrective actions required take place within the stipulated timeframe. On completion of the corrective action the cEO is to issue a Corrective Action Report in writing to the ECOs. If satisfied that the corrective action has been completed, the ECOs are to sign-off on the Corrective Action Report, and attach the report to the non-compliance notice in the EMPr file. A corrective action is considered complete once the report has signed off by the ECOs.

4.9 Photographic record

A digital photographic record will be kept. The photographic record will be used to show before, during and post rehabilitation evidence of the project as well used in cases of damages claims if they arise. Each image must be dated and a brief description note attached.

The Contractor shall:

1. Allow the ECOs access to take photographs of all areas, activities and actions.

The ECOs shall keep an electronic database of photographic records which will include:

- 1. Pictures of all areas designated as work areas, camp areas, development sites and storage areas taken before these areas are set up;
- 2. All bunding and fencing;
- 3. Road conditions and road verges;
- 4. Condition of all farm fences;
- 5. Topsoil storage areas;
- 6. All areas to be cordoned off during construction;
- 7. Waste management sites;
- 8. Ablution facilities (inside and out);
- 9. Any non-conformances deemed to be "significant";
- 10. All completed corrective actions for non-compliances;
- 11. All required signage;
- 12. Photographic recordings of incidents;
- 13. All areas before, during and post rehabilitation; and
- 14. Include relevant photographs in the Final Environmental Audit Report.

# 4.10 Complaints register

The ECOs shall keep a current and up-to-date complaints register. The complaints register is to be a record of all complaints received from communities, stakeholders and individuals. The Complaints Record shall:

- 1. Record the name and contact details of the complainant;
- 2. Record the time and date of the complaint;
- 3. Contain a detailed description of the complaint;
- 4. Where relevant and appropriate, contain photographic evidence of the complaint or damage (ECOs to take relevant photographs); and
- 5. Contain a copy of the ECOs written response to each complaint received and keep a record of any further correspondence with the complainant. The ECO's written

response will include a description of any corrective action to be taken and must be signed by the Contractor, ECO and affected party. Where a damage claim is issued by the complainant, the ECOs shall respond as described in (**section 4.11**) below.

4.11 Claims for damages

In the event that a Claim for Damages is submitted by a community, landowner or individual, the ECOs shall:

- 1. Record the full detail of the complaint as described in (section 4.10) above;
- 2. The DPM will evaluate the claim and associated damage and submit the evaluation to the Senior Site Representative for approval;
- 3. Following consideration by the DPM, the claim is to be resolved and settled immediately, or the reason for not accepting the claim communicated in writing to the claimant. Should the claimant not accept this, the ECO shall, in writing report the incident to the Developer's negotiator and legal department; and
- 4. A formal record of the response by the ECOs to the claimant as well as the rectification of the method of making payments not amount will be recorded in the EMPr file.
- 4.12 Interactions with affected parties

Open, transparent and good relations with affected landowners, communities and regional staff are an essential aspect to the successful management and mitigation of environmental impacts.

The ECOs shall:

- 1. Ensure that all queries, complaints and claims are dealt within an agreed timeframe;
- 2. Ensure that any or all agreements are documented, signed by all parties and a record of the agreement kept in the EMPr file;
- 3. Ensure that a complaints telephone numbers are made available to all landowners and affected parties; and
- 4. Ensure that contact with affected parties is courteous at all times;
- 4.13 Environmental audits

Internal environmental audits of the activity and implementation of the EMPr must be undertaken. The findings and outcomes must be included in the EMPr file and be submitted to the CA at intervals as indicated in the EA.

An Environmental Audit Report must be prepared monthly. The report will be tabled as the key point on the agenda of the Environmental Site Meeting. The Report is submitted for acceptance at the meeting and the final report will be circulated to the Project Manager and filed in the EMPr file. At a frequency determined by the EA, the ECOs shall submit the monthly reports to the CA. At a minimum the monthly report is to cover the following:

- Weekly Environmental Checklists;
- Deviations and non-compliances with the checklists;
- Non-compliances issued;
- Completed and reported corrective actions;
- Environmental Monitoring;

- General environmental findings and actions; and
- Minutes of the Bi-monthly Environmental Site Meetings.
- 4.14 Final environmental audits

On final completion of the rehabilitation and/or requirements of the EA a final EAR is to be prepared and submitted to the CA. The EAR must comply with Appendix 7 of the EIA Regulations.

# PART B: SECTION 1: Pre-approved generic EMPr template

## 5. IMPACT MANAGEMENT OUTCOMES AND IMPACT MANAGEMENT ACTIONS

This section provides a pre-approved generic EMPr template with aspects that are common to the development of overhead electricity transmission and distribution infrastructure. There is a list of aspects identified for the development or expansion of overhead electricity transmission and distribution infrastructure, and for each aspect a set of prescribed impact management outcomes and associated impact management actions have been identified. Holders of EAs are responsible to ensure the implementation of these outcomes and actions for all projects as a minimum requirement, in order to mitigate the impact of such aspects identified for the development or expansion of overhead electricity transmission and distribution infrastructure.

The template provided below is to be completed by providing the information under each heading for each environmental impact management action.

The completed template must be signed and dated on each page by both the contractor and the holder of the EA prior to commencement of the activity. The method statements prepared and agreed to by the holder of the EA must be appended to the template as Appendix 1. Each method statement must also be duly signed and dated on each page by the contactor and the holder of the EA. This template, once signed and dated, is legally binding. The holder of the EA will remain responsible for its implementation.

# 5.1 Environmental awareness training

Impact management outcome: All onsite staff are aware and understands the individual responsibilities in terms of this EMPr.								
Impact Management Actions	Implementati	Implementation			Monitoring			
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of		
	person	implementation	implementation	person		compliance		
<ul> <li>All staff must receive environmental awareness training prior to commencement of the activities;</li> </ul>								
<ul> <li>The Contractor must allow for sufficient sessions to train all</li> </ul>								
personnel with no more than 20 personnel attending each course;								
<ul> <li>Refresher environmental awareness training is available as and when required;</li> </ul>								
- All staff are aware of the conditions and controls linked to the								
EA and within the EMPr and made aware of their individual								
roles and responsibilities in achieving compliance with the EA and EMPr;								
- The Contractor must erect and maintain information posters at								
key locations on site, and the posters must include the								
following information as a minimum:								
a)Safety notifications; and								
b) No littering.								
<ul> <li>Environmental awareness training must include as a minimum the following:</li> </ul>								
a) Description of significant environmental impacts, actual or potential, related to their work activities;								
<ul> <li>b) Mitigation measures to be implemented when carrying out specific activities;</li> </ul>								
c) Emergency preparedness and response procedures;								
d) Emergency procedures;								
	1		1	1	1			

e) Procedures to be followed when working near or

within sensitive areas;			
<li>f) Wastewater management procedures;</li>			
g) Water usage and conservation;			
<ul> <li>h) Solid waste management procedures;</li> </ul>			
i) Sanitation procedures;			
j)Fire prevention; and			
k) Disease prevention.			
- A record of all environmental awareness training courses			
undertaken as part of the EMPr must be available;			
- Educate workers on the dangers of open and/or unattended			
fires;			
- A staff attendance register of all staff to have received			
environmental awareness training must be available.			
- Course material must be available and presented in			
appropriate languages that all staff can understand.			

#### 5.2 Site Establishment development

Impact management outcome: Impacts on the environment are minimised during site establishment and the development footprint are kept to demarcated development area.

Impact Management Actions	Implementati	on	Monitoring			
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of
	person	implementation	implementation	person		compliance
- A method statement must be provided by the contractor prior						
to any onsite activity that includes the layout of the						
construction camp in the form of a plan showing the location						
of key infrastructure and services (where applicable), including						
but not limited to offices, overnight vehicle parking areas,						
stores, the workshop, stockpile and lay down areas, hazardous						
materials storage areas (including fuels), the batching plant (if						

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	one is located at the construction camp), designated access			
	routes, equipment cleaning areas and the placement of staff			
	accommodation, cooking and ablution facilities, waste and			
	wastewater management;			
_	Location of camps must be within approved area to ensure			
	that the site does not impact on sensitive areas identified in the			
	environmental assessment or site walk through;			
_	Sites must be located where possible on previously disturbed			
	areas;			
_	The camp must be fenced in accordance with Section 5.5:			
	Fencing and gate installation; and			
_	The use of existing accommodation for contractor staff, where			
	possible, is encouraged.			

# 5.3 Access restricted areas

Impact management outcome: Access to restricted areas prevented.

Impact Management Actions	Implementati	on		Monitoring		
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of
	person	implementation	implementation	person		compliance
<ul> <li>Identification of access restricted areas is to be informed by the environmental assessment, site walk through and any additional areas identified during development;</li> <li>Erect, demarcate and maintain a temporary barrier with clear signage around the perimeter of any access restricted area, colour coding could be used if appropriate; and</li> <li>Unauthorised access and development related activity inside access restricted areas is prohibited.</li> </ul>						

# 5.4 Access roads

Impact Management Actions	Implementat	ion		Monitoring		
	Responsible person	Method of implementation	Timeframe for implementation	Responsible person	Frequency	Evidence of compliance
<ul> <li>Access to the servitude and tower positions must be negotiated with the relevant landowner and must fall withir the assessed and authorised area;</li> </ul>	; 					
<ul> <li>An access agreement must be formalised and signed by the DPM, Contractor and landowner before commencing with the activities;</li> </ul>	; 1					
<ul> <li>The access roads to tower positions must be signposted afte access has been negotiated and before the commencement of the activities;</li> </ul>	- -					
<ul> <li>All private roads used for access to the servitude must be maintained and upon completion of the works, be left in a least the original condition</li> </ul>						
<ul> <li>All contractors must be made aware of all these access routes.</li> </ul>	5					
<ul> <li>Any access route deviation from that in the writter agreement must be closed and re-vegetated immediately at the contractor's expense;</li> </ul>	,					
<ul> <li>Maximum use of both existing servitudes and existing roads must be made to minimize further disturbance through the development of new roads;</li> </ul>	3					
<ul> <li>In circumstances where private roads must be used, the condition of the said roads must be recorded in accordance with section 4.9: photographic record; prior to use and the condition thereof agreed by the landowner, the DPM, and the contractor;</li> </ul>						
<ul> <li>Access roads in flattish areas must follow fence lines and tree belts to avoid fragmentation of vegetated areas o</li> </ul>						

	croplands			
_	Access roads must only be developed on pre-planned and			
	approved roads.			

#### 5.5 Fencing and Gate installation

**Impact management outcome:** Minimise impact to the environment and ensure safe and controlled access to the site through the erection of fencing and gates where required.

Impact Management Actions	Implementati	on		Monitoring		
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of
	person	implementation	implementation	person		compliance
<ul> <li>Use existing gates provided to gain access to all parts of the</li> </ul>						
area authorised for development, where possible;						
<ul> <li>Existing and new gates to be recorded and documented in</li> </ul>						
accordance with section 4.9: photographic record;						
<ul> <li>All gates must be fitted with locks and be kept locked at all</li> </ul>						
times during the development phase, unless otherwise						
agreed with the landowner;						
<ul> <li>At points where the line crosses a fence in which there is no</li> </ul>						
suitable gate within the extent of the line servitude, on the						
instruction of the DPM, a gate must be installed at the						
approval of the landowner;						
<ul> <li>Care must be taken that the gates must be so erected that</li> </ul>						
there is a gap of no more than 100 mm between the bottom						
of the gate and the ground;						
<ul> <li>Where gates are installed in jackal proof fencing, a suitable</li> </ul>						
reinforced concrete sill must be provided beneath the gate;						
<ul> <li>Original tension must be maintained in the fence wires;</li> </ul>						
<ul> <li>All gates installed in electrified fencing must be re-electrified;</li> </ul>						
<ul> <li>All demarcation fencing and barriers must be maintained in</li> </ul>						
good working order for the duration of overhead						
transmission and distribution electricity infrastructure						

	development activities;			
_	Fencing must be erected around the camp, batching			
	plants, hazardous storage areas, and all designated access			
	restricted areas, where appropriate and would not cause			
	harm to the sensitive flora;			
_	Any temporary fencing to restrict the movement of life-stock			
	must only be erected with the permission of the land owner.			
_	All fencing must be developed of high quality material			
	bearing the SABS mark;			
-	The use of razor wire as fencing must be avoided;			
_	Fenced areas with gate access must remain locked after			
	hours, during weekends and on holidays if staff is away from			
	site. Site security will be required at all times;			
_	On completion of the development phase all temporary			
	fences are to be removed;			
_	The contractor must ensure that all fence uprights are			
	appropriately removed, ensuring that no uprights are cut at			
	ground level but rather removed completely.			

## 5.6 Water Supply Management

Impact management outcome: Undertake responsible water usage.

Impact Management Actions	Implementation			Monitoring			
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of	
	person	implementation	implementation	person		compliance	
<ul> <li>All abstraction points or bore holes must be registered with the DWS and suitable water meters installed to ensure that the abstracted volumes are measured on a daily basis;</li> <li>The Contractor must ensure the following: <ul> <li>a. The vehicle abstracting water from a river does not enter or cross it and does not operate from within the river;</li> <li>b. No damage occurs to the river bed or banks and that</li> </ul> </li> </ul>							

	the abstraction of water does not entail stream diversion			
	activities; and			
	c. All reasonable measures to limit pollution or			
	sedimentation of the downstream watercourse are			
	implemented.			
_	Ensure water conservation is being practiced by:			
	a. Minimising water use during cleaning of equipment;			
	b. Undertaking regular audits of water systems; and			
	c. Including a discussion on water usage and conservation			
	during environmental awareness training.			
	d. The use of grey water is encouraged.			

#### Storm and waste water management 5.7

pact management outcome: Impacts to the environment caused by storm water and wastewater discharges during construction are avoided.								
Impact Management Actions	Implementati	on		Monitoring				
	Responsible person	Method of implementation	Timeframe for implementation	Responsible person	Frequency	Evidence of compliance		
<ul> <li>Runoff from the cement/ concrete batching areas must be strictly controlled, and contaminated water must be collected, stored and either treated or disposed of off-site, at a location approved by the project manager;</li> <li>All spillage of oil onto concrete surfaces must be controlled by the use of an approved absorbent material and the used absorbent material disposed of at an appropriate waste disposal facility;</li> <li>Natural storm water runoff not contaminated during the development and clean water can be discharged directly to watercourses and water bodies, subject to the Project Manager's approval and support by the ECO;</li> <li>Water that has been contaminated with suspended solids, such as soils and silt, may be released into watercourses or water bodies only once all suspended solids have been removed from the water by settling out these solids in settlement ponds. The release of settled water back into the environment must be subject to the Project Manager's approval and support by the ECO.</li> </ul>								

# 5.8 Solid and hazardous waste management

Im	pact management outcome: Waste is appropriately stored, hand	lied and safely	<b>impact management outcome:</b> waste is appropriately stored, nanaled and sately disposed of at a recognised waste facility.									
Im	oact Management Actions	Implementati	ion		Monitoring							
		Responsible person	Method of implementation	Timeframe for implementation	Responsible person	Frequency	Evidence of compliance					
_	All measures regarding waste management must be undertaken using an integrated waste management approach; Sufficient covered waste collection bins (scavenger and											
_	weatherproof) must be provided;											
_	A suitably positioned and clearly demarcated waste collection site must be identified and provided;											
-	The waste collection site must be maintained in a clean and orderly manner;											
-	Waste must be segregated into separate bins and clearly marked for each waste type for recycling and safe disposal;											
-	Staff must be trained in waste segregation;											
-	Bins must be emptied regularly;											
-	General waste produced onsite must be disposed of at registered waste disposal sites/ recycling company;											
_	Hazardous waste must be disposed of at a registered waste disposal site;											
-	Certificates of safe disposal for general, hazardous and recycled waste must be maintained.											

#### Protection of watercourses and estuaries 5.9 . .

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Impact Management Actions	Implementati	on		Monitoring		
	Responsible person	Method of implementation	Timeframe for implementation	Responsible person	Frequency	Evidence of compliance
<ul> <li>All watercourses must be protected from direct or indirect spills of pollutants such as solid waste, sewage, cement, oils, fuels, chemicals, aggregate tailings, wash and contaminated water or organic material resulting from the Contractor's activities;</li> <li>In the event of a spill, prompt action must be taken to clear the polluted or affected areas;</li> <li>Where possible, no development equipment must traverse any seasonal or permanent wetland</li> <li>No return flow into the estuaries must be allowed and no disturbance of the Estuarine Functional Zone should occur;</li> <li>Development of permanent watercourse or estuary crossing must only be undertaken where no alternative access to tower position is available;</li> <li>There must not be any impact on the long term morphological dynamics of watercourses or estuaries;</li> <li>Existing crossing points must be favored over the creation of new crossings (including temporary access)</li> <li>When working in or near any watercourse or estuary, the following environmental controls and consideration must be taken: <ul> <li>a) Water levels during the period of construction;</li> <li>No altering of the bed banks, course or characteristics of a</li> </ul> </li> </ul>	person	implementation	implementation	person		compliance
watercourse b) During the execution of the works, appropriate						
measures to prevent pollution and contamination of the						

riparian environment must be implemented e.g. including			
ensuring that construction equipment is well maintained;			
c) Where earthwork is being undertaken in close proximity			
to any watercourse, slopes must be stabilised using suitable			
materials, i.e. sandbags or geotextile fabric, to prevent sand			
and rock from entering the channel; and			
d) Appropriate rehabilitation and re-vegetation measures			
for the watercourse banks must be implemented timeously.			
In this regard, the banks should be appropriately and			
incrementally stabilised as soon as development allows.			

# 5.10 Vegetation clearing

Impact management outcome: Vegetation clearing is restricted to the authorised development footprint of the proposed infrastructure.

Impact Management Actions	Implementati	on	Monitoring			
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of
	person	implementation	implementation	person		compliance
General:						
<ul> <li>Indigenous vegetation which does not interfere with the development must be left undisturbed;</li> <li>Protected or endangered species may occur on or near the development site. Special care should be taken not to damage such species;</li> <li>Search, rescue and replanting of all protected and endangered species likely to be damaged during project development must be identified by the relevant specialist and completed prior to any development or clearing;</li> <li>Permits for removal must be obtained from the Department of Agriculture, Forestry and Fisheries prior to the cutting or clearing of the affected species, and they must be filed;</li> <li>The Environmental Audit Report must confirm that all</li> </ul>						

	identified species have been rescued and replanted and			
	that the location of replanting is compliant with conditions of			
	approvals;			
_	Trees felled due to construction must be documented and			
	form part of the Environmental Audit Report;			
_	Rivers and watercourses must be kept clear of felled trees,			
	vegetation cuttings and debris;			
_	Only a registered pest control operator may apply			
	herbicides on a commercial basis and commercial			
	application must be carried out under the supervision of a			
	registered pest control operator, supervision of a registered			
	pest control operator or is appropriately trained;			
_	A daily register must be kept of all relevant details of			
	herbicide usage;			
_	No herbicides must be used in estuaries;			
_	All protected species and sensitive vegetation not removed			
	must be clearly marked and such areas fenced off in			
	accordance to Section 5.3: Access restricted areas.			
Serv	/itude:			
_	Vegetation that does not grow high enough to cause			
	interference with overhead transmission and distribution			
	infrastructures, or cause a fire hazard to any plantation, must			
	not be cut or trimmed unless it is growing in the road access			
	area, and then only at the discretion of the Project			
	Manager;			
_	Where clearing for access purposes is essential, the			
	maximum width to be cleared within the servitude must be in			
	accordance to distance as agreed between the land			
	owner and the EA holder			
_	Alien invasive vegetation must be removed according to a			
	plan (in line with relevant municipal and provincial			
	procedures, guidelines and recommendations) and			
	disposed of at a recognised waste disposal facility;			
-	Vegetation must be trimmed where it is likely to intrude on			

	the minimum vegetation clearance distance (MVCD) or will			
	intrude on this distance before the next scheduled			
	clearance. MVCD is determined from SANS 10280;			
_	Debris resulting from clearing and pruning must be disposed			
	of at a recognised waste disposal facility, unless the			
	landowners wish to retain the cut vegetation;			
_	In the case of the development of new overhead			
	transmission and distribution infrastructures, a one metre			
	"trace-line" must be cut through the vegetation for stringing			
	purposes only and no vehicle access must be cleared along			
	the "trace-line". Alternative methods of stringing which limit			
	impact to the environment must always be considered.			

# 5.11 Protection of fauna

Impact management outcome: Minimise disturbance to fauna.									
Impact Management Actions	Implementati	on		Monitoring					
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of			
	person	implementation	implementation	person		compliance			
<ul> <li>No interference with livestock must occur without the landowner's written consent and with the landowner or a person representing the landowner being present;</li> <li>The breeding sites of raptors and other wild birds species must be taken into consideration during the planning of the development programme;</li> <li>Breeding sites must be kept intact and disturbance to breeding birds must be avoided. Special care must be taken where nestlings or fledglings are present;</li> <li>Nesting sites on existing parallel lines must documented;</li> <li>Special recommendations of the avian specialist must be adhered to at all times to prevent unnecessary disturbance of birds;</li> </ul>									

_	Bird guards and diverters must be installed on the new line as			
	per the recommendations of the specialist;			
_	No poaching must be tolerated under any circumstances.			
	All animal dens in close proximity to the works areas must be			
	marked as Access restricted areas;			
_	No deliberate or intentional killing of fauna is allowed;			
_	In areas where snakes are abundant, snake deterrents to be			
	deployed on the pylons to prevent snakes climbing up,			
	being electrocuted and causing power outages; and			
_	No Threatened or Protected species (ToPs) and/or			
	protected fauna as listed according NEMBA (Act No. 10 of			
	2004) and relevant provincial ordinances may be removed			
	and/or relocated without appropriate			
	authorisations/permits.			

# 5.12 Protection of heritage resources

Impact management outcome: Minimise impact to heritage resources.									
Impact Management Actions	Implementati	Implementation			Monitoring				
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of			
	person	implementation	implementation	person		compliance			
<ul> <li>Identify, demarcate and prevent impact to all known sensitive heritage features on site in accordance with the No-Go procedure in Section 5.3: Access restricted areas;</li> <li>Carry out general monitoring of excavations for potential fossils, artefacts and material of heritage importance;</li> <li>All work must cease immediately, if any human remains and/or other archaeological, palaeontological and historical material are uncovered. Such material, if exposed, must be reported to the nearest museum, archaeologist/ palaeontologist (or the South African Police Services), so that a systematic and professional investigation can be</li> </ul>									

undertaken. Sufficient time must be allowed to		
remove/collect such material before development		
recommences.		

#### 5.13 Safety of the public

 Impact management outcome: All precautions are taken to minimise the risk of injury, harm or complaints.
 Monitoring

 Impact Management Actions
 Implementation
 Monitoring

	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of
	person	implementation	implementation	person		compliance
<ul> <li>Identify fire hazards, demarcate and restrict public access to</li> </ul>						
these areas as well as notify the local authority of any						
potential threats e.g. large brush stockpiles, fuels etc.;						
- All unattended open excavations must be adequately						
fenced or demarcated;						
- Adequate protective measures must be implemented to						
prevent unauthorised access to and climbing of partly						
constructed towers and protective scaffolding;						
<ul> <li>Ensure structures vulnerable to high winds are secured;</li> </ul>						
– Maintain an incidents and complaints register in which all						
incidents or complaints involving the public are logged.						

#### 5.14 Sanitation

Impact management outcome: Clean and well maintained toilet facilities are available to all staff in an effort to minimise the risk of disease and impact to the environment.

Impact Management Actions	Implementation			Monitoring		
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of
	person	implementation	implementation	person		compliance
<ul> <li>Mobile chemical toilets are installed onsite if no other ablution facilities are available;</li> </ul>						

-	The use of ablution facilities and or mobile toilets must be used at all times and no indiscriminate use of the yeld for the			
	european of ablutions must be permitted under any			
	purposes of abiutions must be permitted under any			
	circumstances;			
-	Where mobile chemical toilets are required, the following			
	must be ensured:			
	a) Toilets are located no closer than 100 m to any			
	watercourse or water body;			
	b) Toilets are secured to the ground to prevent them from			
	toppling due to wind or any other cause;			
	c) No spillage occurs when the toilets are cleaned or			
	emptied and the contents are managed in accordance			
	with the EMPr;			
	d) Toilets have an external closing mechanism and are			
	closed and secured from the outside when not in use to			
	prevent toilet paper from being blown out;			
	e) Toilets are emptied before long weekends and workers			
	holidays and must be locked after working hours:			
	f) Joilets are serviced required working hours,			
	i) Tollers die serviced regulary and the ECO must inspect			
	tollets to ensure compliance to health standards;			
-	A copy of the waste disposal certificates must be			
	maintained.			

# 5.15 Prevention of disease

Impact Management outcome: All necessary precautions linked to the spread of disease are taken.										
Impact Management Actions	Implementation			Monitoring						
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of				
	person	implementation	implementation	person		compliance				
- Undertake environmentally-friendly pest control in the camp										
area;										
- Ensure that the workforce is sensitised to the effects of										

	covually transmitted dispases, especially UIV AIDS:			
	sexually industriated diseases, especially fit AIDS,			
-	The Contractor must ensure that information posters on AIDS			
	are displayed in the Contractor Camp area;			
_	Information and education relating to sexually transmitted			
	diseases to be made available to both construction workers			
	and local community, where applicable;			
_	Free condoms must be made available to all staff on site at			
	central points;			
_	Medical support must be made available;			
_	Provide access to Voluntary HIV Testing and Counselling			
	Services.			

# 5.16 Emergency procedures

Impact management outcome: Emergency procedures are in place to enable a rapid and effective response to all types of environmental emergencies.

Impact Management Actions	Implementati	lementation			Monitoring		
	Responsible person	Method of implementation	Timeframe for implementation	Responsible person	Frequency	Evidence of compliance	
<ul> <li>Compile an Emergency Response Action Plan (ERAP) prior to the commencement of the proposed project;</li> <li>The Emergency Plan must deal with accidents, potential spillages and fires in line with relevant legislation;</li> <li>All staff must be made aware of emergency procedures as part of environmental awareness training;</li> <li>The relevant local authority must be made aware of a fire as soon as it starts;</li> <li>In the event of emergency necessary mitigation measures to contain the spill or leak must be implemented (see Hazardous Substances section 5.17).</li> </ul>							

## 5.17 Hazardous substances

Impact management outcome: Safe storage, handling, use and disposal of hazardous substances.						
Impact Management Actions	Implementation			Monitoring		
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of
	person	implementation	implementation	person		compliance
<ul> <li>The use and storage of hazardous substances to be minimised and non-hazardous and non-toxic alternatives substituted where possible;</li> <li>All hazardous substances must be stored in suitable containers as defined in the Method Statement;</li> <li>Containers must be clearly marked to indicate contents,</li> </ul>						
	quantities and safety requirements;					
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_	All storage areas must be bunded. The bunded area must					
	be of sufficient capacity to contain a spill / leak from the					
	stored containers;					
_	Bunded areas to be suitably lined with a SABS approved					
	liner;					
_	An Alphabetical Hazardous Chemical Substance (HCS)					
	control sheet must be drawn up and kept up to date on a					
	continuous basis;					
_	All hazardous chemicals that will be used on site must have					
	Material Safety Data Sheets (MSDS);					
_	All employees working with HCS must be trained in the safe					
	use of the substance and according to the safety data					
	sheet;					
_	Employees handling hazardous substances / materials must					
	be aware of the potential impacts and follow appropriate					
	safety measures. Appropriate personal protective					
	equipment must be made available;					
_	The Contractor must ensure that diesel and other liquid fuel,					
	oil and hydraulic fluid is stored in appropriate storage tanks					
	or in bowsers;					
_	The tanks/ bowsers must be situated on a smooth					
	impermeable surface (concrete) with a permanent bund.					
	The impermeable lining must extend to the crest of the bund					
	and the volume inside the bund must be 130% of the total					
	capacity of all the storage tanks/ bowsers (110% statutory					
	requirement plus an allowance for rainfall);					
_	The floor of the bund must be sloped, draining to an oil					
	separator;					
_	Provision must be made for refueling at the storage area by					
	protecting the soil with an impermeable groundcover.					
	Where dispensing equipment is used, a drip tray must be					
	used to ensure small spills are contained;					
_	All empty externally dirty drums must be stored on a drip tray					

	or within a bunded area;				
_	No unauthorised access into the hazardous substances				
	storage areas must be permitted;				
_	No smoking must be allowed within the vicinity of the				
	hazardous storage areas;				
-	Adequate fire-fighting equipment must be made available				
	at all hazardous storage areas;				
-	Where refueling away from the dedicated refueling station is				
	required, a mobile refueling unit must be used. Appropriate				
	ground protection such as drip trays must be used;				
—	An appropriately sized spill kit kept onsite relevant to the				
	scale of the activity/s involving the use of hazardous				
	substance must be available at all times;				
-	The responsible operator must have the required training to				
	make use of the spill kit in emergency situations;				
_	An appropriate number of spill kits must be available and				
	must be located in all areas where activities are being				
	undertaken;				
-	In the event of a spill, contaminated soil must be collected in				
	containers and stored in a central location and disposed of				
	according to the National Environmental Management:				
	waste Act 59 of 2008. Refer to Section 5.7 for procedures				
	concerning storm and waste water management and 5.8 for				
	solia ana nazardous waste management.				

## 5.18 Workshop, equipment maintenance and storage

mpact management outcome: Soil, surface water and groundwater contamination is minimised.								
Impact Management Actions	Implementati	on		Monitoring				
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of		
	person	implementation	implementation	person		compliance		

_	Where possible and practical all maintenance of vehicles				
	and equipment must take place in the workshop area;				
_	During servicing of vehicles or equipment, especially where				
	emergency repairs are effected outside the workshop area,				
	a suitable drip tray must be used to prevent spills onto the				
	soil. The relevant local authority must be made aware of a				
	fire as soon as it starts;				
_	Leaking equipment must be repaired immediately or be				
	removed from site to facilitate repair;				
_	Workshop areas must be monitored for oil and fuel spills;				
_	Appropriately sized spill kit kept onsite relevant to the scale				
	of the activity taking place must be available;				
_	The workshop area must have a bunded concrete slab that				
	is sloped to facilitate runoff into a collection sump or suitable				
	oil / water separator where maintenance work on vehicles				
	and equipment can be performed;				
_	Water drainage from the workshop must be contained and				
	managed in accordance Section 5.7: storm and waste water			1	
	management.				

## 5.19 Batching plants

Impact management outcome: Minimise spillag	es and contamination of	soil, surfac	ce water and grou	ndwater.			
Impact Management Actions	Imple	ementatio	on		Monitoring		
	Resp	onsible	Method of	Timeframe for	Responsible	Frequency	Evidence of
	perso	on	implementation	implementation	person		compliance
- Concrete mixing must be carried out on	an impermeable						
surface;							
<ul> <li>Batching plants areas must be fitted with</li> </ul>	th a containment						
facility for the collection of cement laden v	vater.						
<ul> <li>Dirty water from the batching plant must</li> </ul>	be contained to						
prevent soil and groundwater contamination	on						
<ul> <li>Bagged cement must be stored in an a</li> </ul>	ppropriate facility						
and at least 10 m away from any water c	ourses, gullies and						
drains;							
<ul> <li>A washout facility must be provided for washout</li> </ul>	ashing of concrete						
associated equipment. Water used for	washing must be						
restricted;							
<ul> <li>Hardened concrete from the washout for</li> </ul>	acility or concrete						
mixer can either be reused or disposed of	at an appropriate						
licenced disposal facility;							
<ul> <li>Empty cement bags must be secured</li> </ul>	d with adequate						
binding material if these will be temporarily	stored on site;						
<ul> <li>Sand and aggregates containing ceme</li> </ul>	ent must be kept						
damp to prevent the generation of dust	(Refer to <b>Section</b>						
5.20: Dust emissions)							
<ul> <li>Any excess sand, stone and cement must</li> </ul>	st be removed or						
reused from site on completion of constru	uction period and						
disposed at a registered disposal facility;							
<ul> <li>Temporary fencing must be erected aroun</li> </ul>	nd batching plants						
in accordance with <b>Section 5.5: Fe</b>	ncing and gate						
installation.							

#### 5.20 Dust emissions

Impact management outcome: Dust prevention measures are applied to minimise the generation of dust.	
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Imp	act Management Actions	Implementation			Monitoring		
		Responsible person	Method of implementation	Timeframe for implementation	Responsible person	Frequency	Evidence of compliance
_	Take all reasonable measures to minimise the generation of dust as a result of project development activities to the satisfaction of the ECO; Removal of vegetation must be avoided until such time as soil stripping is required and similarly exposed surfaces must						
	be re- vegetated or stabilised as soon as is practically possible;						
_	Excavation, handling and transport of erodible materials must be avoided under high wind conditions or when a visible dust plume is present;						
_	During high wind conditions, the ECO must evaluate the situation and make recommendations as to whether dust- damping measures are adequate, or whether working will cease altogether until the wind speed drops to an acceptable level;						
_	Where possible, soil stockpiles must be located in sheltered areas where they are not exposed to the erosive effects of the wind;						
_	Where erosion of stockpiles becomes a problem, erosion control measures must be implemented at the discretion of the ECO;						
_	Vehicle speeds must not exceed 40 km/h along dust roads or 20 km/h when traversing unconsolidated and non- vegetated areas;						
-	Straw stabilisation must be applied at a rate of one bale/10						

	m <sup>2</sup> and harrowed into the top 100 mm of top material, for all			
	completed earthworks;			
_	For significant areas of excavation or exposed ground, dust			
	suppression measures must be used to minimise the spread			
	of dust.			

#### 5.21 Blasting

Impact management outcome: Impact to the environment is minimised through a safe blasting practice.

Impact Management Actions	Implementati	on	Monitoring			
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of
	person	implementation	implementation	person		compliance
<ul> <li>Any blasting activity must be conducted by a suitably licensed blasting contractor; and</li> <li>Notification of surrounding landowners, emergency services site personnel of blasting activity 24 hours prior to such activity taking place on Site.</li> </ul>						

#### 5.22 Noise

Impact Management outcome: Unnecessary noise is prevented by ensuring that noise from construction activities is mitigated.

Impact Management Actions	Implementati	Implementation			Monitoring		
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of	
	person	implementation	implementation	person		compliance	
<ul> <li>The Contractor must keep noise level within acceptable limits, Restrict the use of sound amplification equipment for communication and emergency only;</li> <li>All vehicles and machinery must be fitted with appropriate silencing technology and must be properly maintained;</li> <li>Any complaints received by the Contractor regarding noise must be recorded and communicated. Where possible or</li> </ul>							

	applicable, provide transport to and from the site on a daily			
	basis for construction workers;			
_	Develop a Code of Conduct for the construction phase in terms of			
	behaviour of construction staff. Operating hours as determined			
	by the environmental authorisation are adhered to during			
	the development phase. Where not defined, it must be			
	ensured that development activities must still meet the			
	impact management outcome related to noise			
	management.			

#### 5.23 Fire prevention

Impact management outcome: Prevention of uncontrollable fires.

Impact Management Actions	Implementati	ion	Monitoring				
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of	
	person	implementation	implementation	person		compliance	
<ul> <li>Designate smoking areas where the fire hazard could be regarded as insignificant;</li> <li>Firefighting equipment must be available on all vehicles located on site;</li> <li>The local Fire Protection Agency (FPA) must be informed of construction activities;</li> <li>Contact numbers for the FPA and emergency services must be communicated in environmental awareness training and displayed at a central location on site;</li> <li>Two way swop of contact details between ECO and FPA.</li> </ul>							

#### 5.24 Stockpiling and stockpile areas

Impact management outcome: Erosion and sedimentation as a result of stockpiling are reduced.					
Impact Management Actions	Implementation	Monitoring			

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	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of
	person	implementation	implementation	person		compliance
<ul> <li>All material that is excavated during the project development phase (either during piling (if required) or earthworks) must be stored appropriately on site in order to minimise impacts to watercourses, watercourses and water bodies;</li> <li>All stockpiled material must be maintained and kept clear of weeds and alien vegetation growth by undertaking regular weeding and control methods;</li> <li>Topsoil stockpiles must not exceed 2 m in height;</li> <li>During periods of strong winds and heavy rain, the stockpiles must be covered with appropriate material (e.g. cloth, tarpaulin etc.);</li> <li>Where possible, sandbags (or similar) must be placed at the bases of the stockpiled material in order to prevent erosion</li> </ul>						

## 5.25 Finalising tower positions

Impact management outcome: No environmental degradation occurs as a result of the survey and pegging operations.

Impact Management Actions	Implementati	on		Monitoring		
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of
	person	implementation	implementation	person		compliance
<ul> <li>No vegetation clearing must occur during survey and pegging operations;</li> <li>No new access roads must be developed to facilitate access for survey and pegging purposes;</li> <li>Project manager, botanical specialist and contractor to agree on final tower positions based on survey within assessed and approved areas;</li> <li>The surveyor is to demarcate (peg) access roads/tracks in consultation with ECO. No deviations will be allowed without</li> </ul>						
the prior written consent from the ECO.						

#### 5.26 Excavation and Installation of foundations

Impact management outcome: No environmental degradation occurs as a result of excavation or installation of foundations.

Impact Management Actions	Implementati	on		Monitoring		
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of
	person	implementation	implementation	person		compliance
<ul> <li>All excess spoil generated during foundation excavation must be disposed of in an appropriate manner and at a recognised disposal site, if not used for backfilling purposes;</li> <li>Spoil can however be used for landscaping purposes and must be covered with a layer of 150 mm topsoil for rehabilitation purposes;</li> <li>Management of equipment for excavation purposes must be undertaken in accordance with Section 5.18: Workshop equipment maintenance and storage; and</li> </ul>						

_	Hazardous substances spills from equipment must be			
	managed in accordance with Section 5.17: Hazardous			
	substances.			
_	Batching of cement to be undertaken in accordance with			
	Section 5.19 : Batching plants;			
_	Residual cement must be disposed of in accordance with			
	Section 5.8: Solid and hazardous waste management.			

## 5.27 Assembly and erecting towers

Impact management outcome: No environmental degradation occurs as a result of assembly and erecting of towers.

Impact Management Actions	Implementati	ation Monitoring				
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of
<ul> <li>Prior to erection, assembled towers and tower sections must be stored on elevated surface (suggest wooden blocks) to minimise damage to the underlying vegetation;</li> <li>In sensitive areas, tower assembly must take place off-site or away from sensitive positions;</li> <li>The crane used for tower assembly must be operated in a manner which minimises impact to the environment;</li> <li>The number of crane trips to each site must be minimised;</li> <li>Wheeled cranes must be utilised in preference to tracked cranes;</li> <li>Consideration must be given to erecting towers by helicopter or by hand where it is warranted to limit the extent of environmental impact;</li> <li>Access to tower positions to be undertaken in accordance with access requirements in specified in Section 8.4: Access Roads;</li> <li>Vegetation clearance to be undertaken in accordance with general vegetation clearance requirements specified</li> </ul>						

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	in Section 8.10: Vegetation clearing;			
_	No levelling at tower sites must be permitted unless			
	approved by the Development Project Manager or			
	Developer Site Supervisor;			
_	Topsoil must be removed separately from subsoil material			
	and stored for later use during rehabilitation of such tower			
	sites;			
_	Topsoil must be stored in heaps not higher than 1m to			
	prevent destruction of the seed bank within the topsoil;			
_	Excavated slopes must be no greater that 1:3, but where this			
	is unavoidable, appropriate measures must be undertaken			
	to stabilise the slopes;			
_	Fly rock from blasting activity must be minimised and any			
	pieces greater than 150 mm falling beyond the Working			
	Area, must be collected and removed;			
_	Only existing disturbed areas are utilised as spoil areas;			
_	Drainage is provided to control groundwater exit gradient			
	with the spill areas such that migration of fines is kept to a			
	minimum;			
_	Surface water runoff is appropriately channeled through or			
	around spoil areas;			
_	During backfilling operations, care must be taken not to			
	dump the topsoil at the bottom of the foundation and then			
	put spoil on top of that;			
_	The surface of the spoil is appropriately rehabilitated in			
	accordance with the requirements specified in Section			
	5.29: Landscaping and rehabilitation;			
_	The retained topsoil must be spread evenly over areas to be			
	rehabilitated and suitably compacted to effect re-			
	vegetation of such areas to prevent erosion as soon as			
	construction activities on the site is complete. Spreading of			
	topsoil must not be undertaken at the beginning of the dry			
	season.			

## 5.28 Stringing

mpact management outcome: No environmental degradation occurs as a result of stringing.									
Implementation			Monitoring						
oonsible son	Method of implementation	Timeframe for implementation	Responsible person	Frequency	Evidence of compliance				
	s a result mentation onsible on	s a result of stringing.	s a result of stringing.	s a result of stringing.          amentation       Monitoring         onsible       Method of implementation       Timeframe for implementation       Responsible person         on       implementation       Implementation       Implementation       Implementation	s a result of stringing.           amentation         Monitoring           onsible         Method of implementation         Timeframe for implementation         Responsible person         Frequency				

-	No services (electrical distribution lines, telephone lines,			
	roads, railways lines, pipelines fences etc.) must be			
	damaged because of stringing operations. Where disruption			
	to services is unavoidable, persons affected must be given			
	reasonable notice, in writing;			
_	Where stringing operations cross cultivated land, damage to			
	crops is restricted to the minimum required to conduct			
	stringing operations, and reasonable notice (10 work days			
	minimum), in writing, must be provided to the landowner;			
_	Necessary scaffolding protection measures must be installed			
	to prevent damage to the structures supporting certain high			
	value agricultural areas such as vineyards, orchards,			
	nurseries.			

#### 5.29 Socio-economic

Impact management outcome: Socio-economic development is enhanced.

				1		
Impact Management Actions	Implementati	on	Monitoring			
	Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of
	person	implementation	implementation	person		compliance
<ul> <li>Develop and implement communication strategies to facilitate public participation;</li> <li>Develop and implement a collaborative and constructive approach to conflict resolution as part of the external stakeholder engagement process;</li> <li>Sustain continuous communication and liaison with neighboring owners and residents</li> <li>Create work and training opportunities for local stakeholders; and</li> <li>Where feasible, no workers, with the exception of security personnel, must be permitted to stay over-night on the site. This would reduce the risk to local farmers.</li> </ul>						

## 5.30 Temporary closure of site

Impact management outcome: Minimise the risk of environmental impact during periods of site closure greater than five days.

Imp	oact Management Actions	Implementati	Implementation			Monitoring		
		Responsible	Method of	Timeframe for	Responsible	Frequency	Evidence of	
		person	implementation	implementation	person		compliance	
-	Bunds must be emptied (where applicable) and need to be							
	undertaken in accordance with the impact management							
	actions included in sections 5.17: management of hazardous							
	substances and 5.18 workshop, equipment maintenance							
	and storage;							
_	Hazardous storage areas must be well ventilated;							
_	Fire extinguishers must be serviced and accessible. Service							
	records to be filed and audited at last service;							
_	Emergency and contact details displayed must be							
	displayed;							
_	Security personnel must be briefed and have the facilities to							
	contact or be contacted by relevant management and							
	emergency personnel;							
-	Night hazards such as reflectors, lighting, traffic signage etc.							
	must have been checked;							
_	Fire hazards identified and the local authority must have							
	been notified of any potential threats e.g. large brush							
	stockpiles, fuels etc.;							
_	Structures vulnerable to high winds must be secured;							
_	Wind and dust mitigation must be implemented;							
_	Cement and materials stores must have been secured;							
_	Toilets must have been emptied and secured;							
_	Refuse bins must have been emptied and secured;							
_	Drip trays must have been emptied and secured.							

## 5.31 Landscaping and rehabilitation

Impact Management Actions	Implementati	ion		Monitoring		
	Responsible person	Method of implementation	Timeframe for implementation	Responsible person	Frequency	Evidence of compliance
<ul> <li>All areas disturbed by construction activities must be subject to landscaping and rehabilitation; All spoil and waste must be disposed to a registered waste site and certificates of disposal provided;</li> <li>All slopes must be assessed for contouring, and to contour only when the need is identified in accordance with the Conservation of Agricultural Resources Act, No 43 of 1983</li> <li>All slopes must be assessed for terracing, and to terrace only when the need is identified in accordance with the Conservation of Agricultural Resources Act, No 43 of 1983;</li> <li>Berms that have been created must have a slope of 1:4 and be replanted with indigenous species and grasses that approximates the original condition;</li> <li>Where new access roads have crossed cultivated farmlands,</li> </ul>						
<ul> <li>that lands must be rehabilitated by ripping which must be agreed to by the holder of the EA and the landowners;</li> <li>Rehabilitation of tower sites and access roads outside of farmland;</li> </ul>						
<ul> <li>Indigenous species must be used for with species and/grasses to where it compliments or approximates the original condition;</li> </ul>						
- Stockpiled topsoil must be used for rehabilitation (refer to						
- Stockpiled topsoil must be evenly spread so as to facilitate						
seeding and minimise loss of soil due to erosion:						
<ul> <li>Before placing topsoil, all visible weeds from the placement area and from the topsoil must be removed;</li> </ul>						

## Dalmanutha Wind (Pty) Ltd Dalmanutha Hybrid Energy Facility

-	Subsoil must be ripped before topsoil is placed;			
_	The rehabilitation must be timed so that rehabilitation can			
	take place at the optimal time for vegetation establishment;			
_	Where impacted through construction related activity, all			
	sloped areas must be stabilised to ensure proper			
	rehabilitation is effected and erosion is controlled ;			
_	Sloped areas stabilised using design structures or vegetation			
	as specified in the design to prevent erosion of			
	embankments. The contract design specifications must be			
	adhered to and implemented strictly;			
_	Spoil can be used for backfilling or landscaping as long as it			
	is covered by a minimum of 150 mm of topsoil.			
_	Where required, re-vegetation including hydro-seeding can			
	be enhanced using a vegetation seed mixture as described			
	below. A mixture of seed can be used provided the mixture			
	is carefully selected to ensure the following:			
	a) Annual and perennial plants are chosen;			
	b) Pioneer species are included:			
	c) Species chosen must be indigenous to the grea with the			
	seeds used coming from the grea:			
	d) Root systems must have a binding effect on the soil:			
	e) The final product must not cause an ecological			
	imbalance in the area			

## 6 ACCESS TO THE GENERIC EMPr

Once completed and signed, to allow the public access to the generic EMPr, the holder of the EA must make the EMPr available to the public in accordance with the requirements of regulation 26(h) of the EIA Regulations.

## PART B: SECTION 2

## 7 SITE SPECIFIC INFORMATION AND DECLARATION

#### 7.1 Sub-section 1: contact details and description of the project

7.1.1 Details of the applicant:

Name of Applicant :	Dalmanutha Wind (Pty) Ltd
Contact Person:	Mercia Grimbeek
Postal Address	Suite 104, Albion Springs, 183 Main Road, Rondebosch, Cape Town, South Africa 7700
Telephone:	+27 78 299 3515
Email:	Mercia.Grimbeek@enertrag.com / Mmakoena.Mmola@enertrag.com

Refer to Section 1.2 of the EMPr

7.1.2 Details and expertise of the EAP:

WSP was appointed in the role of Independent EAP to undertake the EIA processes for the proposed construction of the powerline. The CV of the EAP is available in Appendix A. The EAP declaration of interest and undertaking is included in Appendix B.

## EAP WSP GROUP AFRICA (PTY) LTD

Contact Person:	Ashlea Strong
Physical Address:	Building C, Knightsbridge, 33 Sloane Street, Bryanston, Johannesburg
Postal Address:	P.O. Box 98867, Sloane Park 2151, Johannesburg
Telephone:	011 361 1392
Fax:	011 361 1301
Email:	Ashlea.Strong@wsp.com

Refer to Section 1.3 of the EMPr

#### 7.1.3 Project name:

## Dalmanutha Hybrid Energy Facility, Belfast, Mpumalanga

7.1.4 Description of the project:

#### Refer to Section 3 of the EMPr

For the WEF, the medium voltage collector system will comprise of cables up to and including 33kV that run underground, except where a technical assessment suggest that overhead lines are required, within the facility connecting the turbines to the onsite substation. The SEF will comprise low and medium voltage cabling between components (above or below ground as needed).



Figure 0-1: Locality of the Proposed Dalmanutha hybrid facility, in the Mpumalanga Province

#### 7.1.5 Project location:

#### Refer to Section 3.1 of the EMPr

The proposed Dalmanutha Hybrid Energy Facility will have a project area of approximately 9 197 hectares (ha). Within this project area the extent of the buildable area will be approximately 400 ha subject to finalization based on technical and environmental requirements.

The proposed Dalmanutha Hybrid Energy Facility is located south-east of Belfast in Mpumalanga and falls within the jurisdiction of the Emakhazeni and Albert Luthuli Local Municipalities, Nkangala and Gert Sibande District municipalities.



#### Figure 0-2: Proposed Project Infrastructure

7.16 Preliminary technical specification of the overhead transmission and distribution:

Refer to Section 3 of the EMPr

The proposed project overhead powerline grid connection infrastructure will comprise the following key components:

For the WEF, the medium voltage collector system will comprise of cables up to and including 33kV that run underground, except where a technical assessment suggest that overhead lines are required, within the facility connecting the turbines to the onsite substation. The SEF will comprise low and medium voltage cabling between components (above or below ground as needed).

- The servitude width for 1x up to 33kV transmission line is 32m.
- The actual number of structures required will vary according to the final route alignment determined. A working area of approximately 100m x 100m will be required.

## 7.2 Sub-section 2: Development footprint site map

This sub-section must include a map of the site sensitivity overlaid with the preliminary infrastructure layout. The sensitivity map must be prepared from the national web based available environmental screening tool, when for compulsory use at: https://screening.environment.gov.za/screeningtool. The sensitivity map shall identify the nature of each sensitive feature e.g. raptor nest, threatened plant species, archaeological site, etc. Sensitivity maps shall identify features both within the planned working area and any known sensitive features in the surrounding landscape. The overhead transmission and distribution profile shall be illustrated at an appropriate resolution to enable fine scale interrogation. It is recommended that <20 km of overhead transmission and distribution length is illustrated per page in A3 landscape format. Where considered appropriate, photographs of sensitive features in the context of tower positions shall be used.

#### Refer to Section 3.4 of the EMPr

The Table 0-1 below indicates the sensitivities identified by the screening tool and the specialist verification of those sensitivities in the area of the preferred up to 132kV powerline connection to the substation.

Specialist Assessment	Assessment Protocol	DFFE Screening Tool Sensitivity (WEF)	DFFE Screening Tool Sensitivity (SEF)	Specialist Sensitivity Verification
Agricultural Compliance Statement	Protocol for the specialist assessment and minimum report content requirements of environmental impacts on agricultural resources by onshore wind and/or solar photovoltaic	High and Medium Sensitivity	High and Medium Sensitivity	High and Low Sensitivity

Table 0-1 - Assessment Protocols and Site Sensitivity Verifications

Specialist Assessment	Assessment Protocol	DFFE Screening Tool Sensitivity (WEF)	DFFE Screening Tool Sensitivity (SEF)	Specialist Sensitivity Verification
	energy generation facilities where the electricity output is 20 megawatts or more			
Terrestrial Biodiversity Impact Assessment	Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Terrestrial Biodiversity	High Sensitivity	High Sensitivity	High Sensitivity
Aquatic Biodiversity Impact Assessment	Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Aquatic Biodiversity	High and Low Sensitivity	High and Low Sensitivity	High to Very High Sensitivity for Wetlands
Plant Species	Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Terrestrial Plant Species	Medium and Low Sensitivity	Medium and Low Sensitivity	Medium Sensitivity
Animal Species	Protocol for the Specialist Assessment and Minimum Report	High and Medium Sensitivity	High and Medium Sensitivity	High- Medium Sensitivity

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Specialist Assessment	Assessment Protocol	DFFE Screening Tool Sensitivity (WEF)	DFFE Screening Tool Sensitivity (SEF)	Specialist Sensitivity Verification
	Content Requirements for Environmental Impacts on Terrestrial Animal Species			
Bats	Site Sensitivity Verification Requirements where a specialist Assessment is required but no Specific Assessment Protocol has been prescribed	High Sensitivity	N/A	High to Medium Sensitivity
Avifauna Impact Assessment	Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Terrestrial Animal Species	Low Sensitivity	Low Sensitivity	Very High Sensitivity
Archaeological and Cultural Heritage Impact Assessment	Site Sensitivity Verification Requirements where a specialist Assessment is required but no Specific Assessment Protocol has been prescribed	Low Sensitivity	Low Sensitivity	Low with isolated points as High Sensitivity
Palaeontology Impact Assessment	Site Sensitivity Verification Requirements where a	Very High and High Sensitivity	Very High and High Sensitivity	Low Sensitivity

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Specialist Assessment	Assessment Protocol	DFFE Screening Tool Sensitivity (WEF)	DFFE Screening Tool Sensitivity (SEF)	Specialist Sensitivity Verification
	specialist Assessment is required but no Specific Assessment Protocol has been prescribed			
Visual (Landscape) Impact Assessment	Site Sensitivity Verification Requirements where a specialist Assessment is required but no Specific Assessment Protocol has been prescribed	Very High Sensitivity	Very High Sensitivity	High Sensitivity
Flicker Assessment	Site Sensitivity Verification Requirements where a specialist Assessment is required but no Specific Assessment Protocol has been prescribed	High and Low Sensitivity	N/A	High Sensitivity
Noise Assessment	Protocol for Specialist Assessment and Minimum Report Content requirements for Noise Impacts	High and Low Sensitivity	N/A	Medium to Low Sensitivity
Civil Aviation Assessment	Site Sensitivity Verification Requirements where a specialist Assessment is required but no Specific	High Sensitivity	Low Sensitivity	Low Sensitivity

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Specialist Assessment	Assessment Protocol	DFFE Screening Tool Sensitivity (WEF)	DFFE Screening Tool Sensitivity (SEF)	Specialist Sensitivity Verification
	Assessment Protocol has been prescribed			
Defence Assessment	Site Sensitivity Verification Requirements where a specialist Assessment is required but no Specific Assessment Protocol has been prescribed	Low Sensitivity	Low Sensitivity	Low Sensitivity
RFI Assessment	Site Sensitivity Verification Requirements where a specialist Assessment is required but no Specific Assessment Protocol has been prescribed	Low Sensitivity	Low Sensitivity	Low Sensitivity



#### Figure 0-3: Overall Site Sensitivity

#### 7.3 Sub-section 3: Declaration

The proponent/applicant or holder of the EA affirms that he/she will abide and comply with the prescribed impact management outcomes and impact management actions as stipulated in <u>part B: section 1</u> of the generic EMPr and have the understanding that the impact management outcomes and impact management actions are legally binding. The proponent/applicant or holder of the EA affirms that he/she will provide written notice to the CA 14 days prior to the date on which the activity will commence of commencement of construction to facilitate compliance inspections.

## To be signed in the Final Report

Signature Proponent/applicant/ holder of EA

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Date:

## 7.4 Sub-section 4: amendments to site specific information (Part B; section 2)

Should the EA be transferred to a new holder, <u>Part B: Section 2</u> must be completed by the new holder and submitted with the application for an amendment of the EA in terms of Regulations 29 or 31 of the EIA Regulations, whichever applies. The information submitted for an amendment to an environmental authorisation will be considered to be incomplete should a signed copy of <u>Part B: Section 2</u> not be submitted. Once approved, <u>Part B: Section 2</u> forms part of the EMPr for the development and the EMPr becomes legally binding to the new EA holder.

## PART C

## 8 SITE SPECIFIC ENVIRONMENTAL ATTRIBUTES

If any specific environmental sensitivities/attributes are present on the site which require more specific impact management outcomes and impact management actions, not included in the pre-approved generic EMPr template, to manage impacts, those impact management outcomes and actions must be included in this section. These specific management controls must be referenced spatially, and must include impact management outcomes and impact management actions. The management controls including impact management outcomes and impact management actions must be presented in the format of the pre-approved generic EMPr template. This applies only to additional impact management outcomes and impact management actions that are necessary.

If <u>Part C</u> is applicable to the development as authorised in the EA, it is required to be submitted to the CA together with the BAR or EIAR, for consideration of, and decision on, the application for EA. The information in this section must be prepared by an EAP and the name and expertise of the EAP, including the curriculum vitae are to be included. Once approved, <u>Part C</u> forms part of the EMPr for the site and is legally binding.

This section will **not be required** should the site contain no specific environmental sensitivities or attributes.

The **Chance Find procedure** for fossils and heritage finds on site is specified in the **Table 0-3** below are prescribed by the Heritage specialist Jaco van der Walt (Beyond Heritage, 2023), with regards to the overhead powerline and its possible impact on the identified heritage finds (Ruins and burial sites) in the area. The complete heritage impact assessment report can be found in **Appendix H-4 of the EIAr**.

Furthermore, all site-specific mitigation pertaining to the Dalmanutha Hybrid Energy Facility are included in the main EMPr.

## Heritage Chance Find Procedure

The following procedural guidelines must be considered in the event that previously unknown heritage resources are exposed or found during the construction of the Hendrina GH&A facility Project area. This chance find procedure (CFP) must be read in conjunction with the Environmental Authorisation, the Environmental Management Programme, Final EIAR and the final layout archaeological ground-truthing report.

The Contractor or other person discovering a potentially significant site or artefact will initiate the following actions:

• If fossils occur in the footprint of any section of the project, the route for the grid connection (overhead powerline pole foundations/below ground piping), the hydrogen and ammonia facilities, access roads or infrastructure, they can be removed as per the Fossil Chance Find Protocol in the EMPr, and the project can continue. If no fossils are found, then no mitigation is required.

• When excavations begin the rocks and must be given a cursory inspection by the environmental officer or designated person.

• Any fossiliferous material (trace fossils, fossils of plants, insects, bone or coalified material) should be put aside in a suitably protected place. This way the project activities will not be interrupted.

• Photographs of similar fossils must be provided to the contractor/s to assist in recognizing the fossil plants, vertebrates, invertebrates or trace fossils in the shales and mudstones. This information will be built into the EMP's training and awareness plan and procedures.

• Photographs of the putative fossils can be sent to the palaeontologist for a preliminary assessment.

• If there is any possible fossil material found by the contractor/s /environmental officer then the qualified palaeontologist sub-contracted for this project, should visit the site to inspect the selected material and check the dumps where feasible.

• Fossil plants or vertebrates that are considered to be of good quality or scientific interest by the palaeontologist must be removed, catalogued and housed in a suitable institution where they can be made available for further study. Before the fossils are removed from the site a SAHRA permit must be obtained.

• Annual reports must be submitted to SAHRA as required by the relevant permits.

• If no good fossil material is recovered, then no site inspections by the palaeontologist will be necessary. A final report by the palaeontologist must be sent to SAHRA once the project has been completed and only if there are fossils.

• If no fossils are found and the excavations have finished, then no further monitoring is required.

The Grievance Procedure and Guidance will apply to any stakeholder complaints relating to cultural heritage and chance finds;

Chance find recording shall include the following:

- Incident Notification;
- Incident Report;

Incident (Chance Find) Investigation Report – e.g. detailing corrective actions, with digital images, maps and plans showing any locations that are no-go, limited access or present risks of further chance finds.

#### **APPENDIX 1: METHOD STATEMENTS**

To be prepared by the contractor prior to commencement of the activity. The method statements are **not required** to be submitted to the CA.

# vsp

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