



ENVIRONMENTAL MANAGEMENT PROGRAMME (EMPR)

FOR THE DEVELOPMENT OF VEHICLE DEALERSHIPS AND FACILITIES ON PORTION 59 OF THE FARM BULTFONTEIN 533 JQ AS WELL AS A BOREHOLE AND CONSERVANCY TANK ON PORTION 168 OF THE FARM BULTFONTEIN 533 JQ

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4 Wheel Drive Property Holdings (Pty) Ltd.

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1 INTRODUCTION

1.1 Overview

4 Wheel Drive Property Holdings (Pty) Ltd proposes to develop and operate facilities for showing, servicing, rental, parking, washing, preparation and administration of vehicles on Portion 59 of the Farm Bultfontein 533 JQ. The relevant services, roads and complementary uses will also be put in place. Sufficient parking will be provided and the site will be landscaped with indigenous trees, shrubs and plants. In addition, a borehole will be used to supplement municipal water supply. Grey water recycling from vehicle wash bays will take place and sewer will be stored in a conservancy tank and collected weekly.

It should be noted that a separate Environmental Authorisation (EA) process was undertaken for the adjacent property (Portion 168) and EA issued on 6 August 2018 (GAUT: 002/17-18/E2160). However, after further investigations into the need for and desirability of the area, 4 Wheel Drive Property Holdings (Pty) Ltd. decided to purchase Portion 59 as additional space was required and needed for access to Portion 158. An amendment of the existing authorisation was not possible as the change (development of Portion 59) constitutes a new listed activity (Activity 4 and 12 of Listing Notice 3). As such a separate EA process is being undertaken.

1.2 Project Location

The proposed development occurs on Portion 59 of the Farm Bultfontein 533 JQ. **Table 1-1** provides an overview of property details together the Surveyor General 21-digit diagram number. An overview of the locality is provided in Figure 1-1 and Figure 1-2.

Table 1-1: Property Details

21-digit code	Property Description	Coordinates
T0JQ0000000053300059	Portion 59 of the Farm Bultfontein 533 JQ	25°57'54.62"S 27°55'27.68"E

As mentioned, activities are already approved on Portion 168 of the Farm Bultfontein 533 JQ and as part of that process, a separate EMPr was compiled and subsequently approved. The sewer conservancy tanks and borehole which will provide sewer storage and supplementary water for both Portion 168 and 59 are located on Portion 168.

1.3 Alternatives

As required by the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), alternatives have been as been assessed as part of the Basic Assessment (BA) process. Both alternatives occur on Portion 59 and thus the mitigation measures in this document apply to both. The main differences between the proposal and alternative is erf 1 (the Hino Dealership). Figure 1-3 and Figure 1-4 provide an overview of the alternative layouts.

1.3.1 Proposal

The proposal involves the development of the north-western section of the site with the truck dealership. In the proposal, the dealership buildings and showrooms along the western boundary of the site (parallel to the R512). The aim of this placement is to increase visibility. The parking area is then located towards the back of the development footprint.

1.3.2 Alternative 1

The alternative differs the parking area is located along the western boundary and the dealerships are then behind the parking area. This reduces the visibility of the truck dealership and thus has a related negative socio-economic impact.

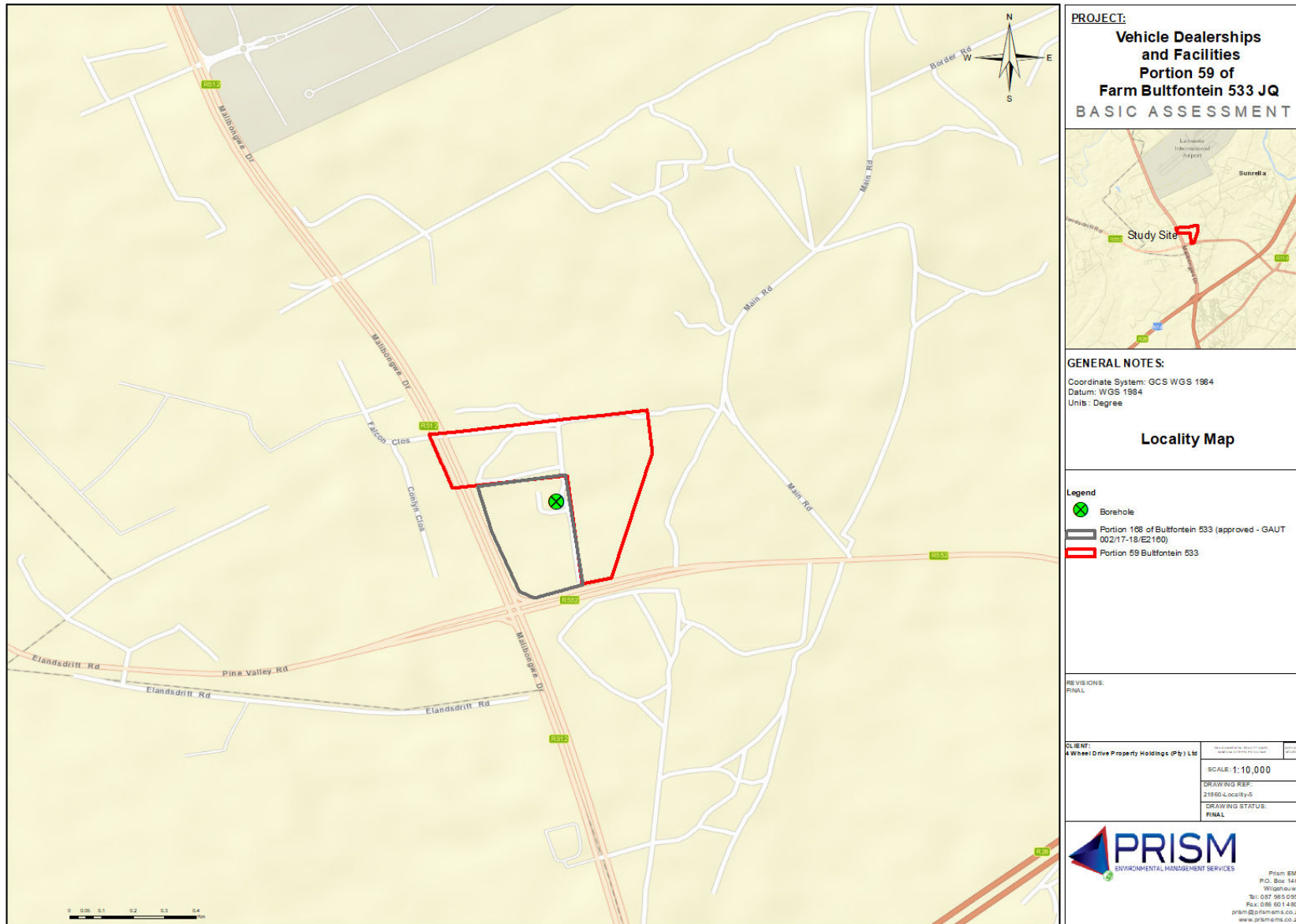


Figure 1-1: Locality Map

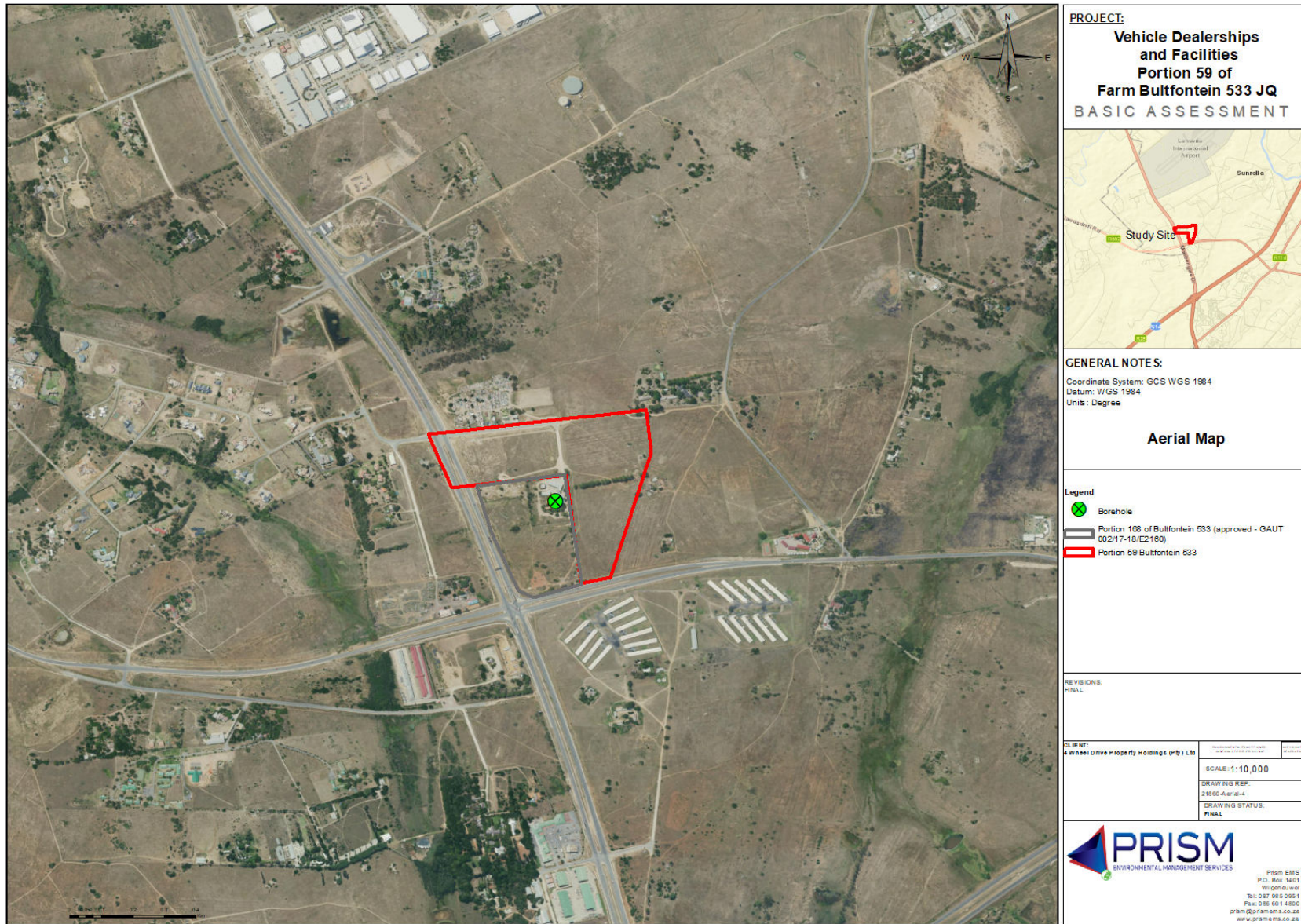


Figure 1-2: Aerial Locality Map



Figure 1-3: Proposed Layout

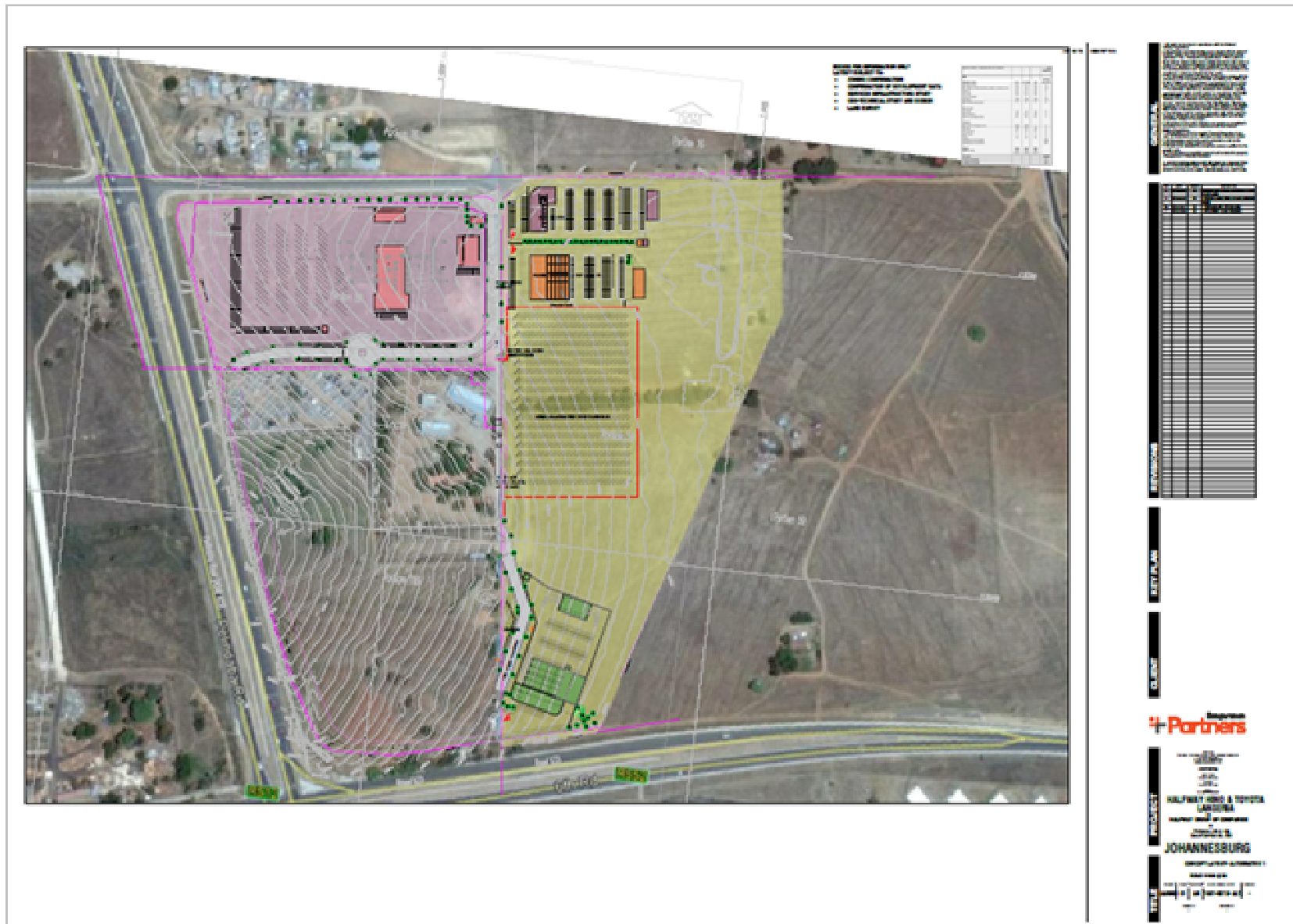


Figure 1-4: Alternative Layout

2 EMPr REQUIREMENTS AND REPORT OUTLINE

The contents of this EMPr has been compiled according to the prescribed minimum legal requirements contained in Appendix 4 of the EIA Regulations, 2014 (as amended). Refer to **Table 2-1** below. Additional sections have been added to the report for purposes of best environmental practice.

Table 2-1: Contents of EMPr

Chapter Number	Chapter Name	Requirements included in Appendix 4 of 2014 EIA Regulations
1.	Introduction	-
2.	EMPr Requirements and Report Outline	-
3.	Details of EAP	(a) details of (i) the EAP who prepared the EMPr; and (ii) the expertise of that EAP to prepare an EMPr, including a curriculum vitae;
4.	Project Description and Activities, Aspects, and Impacts	(b) a detailed description of the aspects of the activity that are covered by the EMPr as identified by the project description.
5.	Environmental Sensitivity	(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 should be avoided, including buffers;
6.	Goals and Objectives	(d) a description of the impact management objectives, 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- (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; (e) a description and identification of impact management outcomes required for the aspects contemplated in paragraph (d)
7.	General Roles and Responsibilities	(i) an indication of the persons who will be responsible for the implementation of the impact management actions

Chapter Number	Chapter Name	Requirements included in Appendix 4 of 2014 EIA Regulations
8.	Environmental Awareness Plan	<p>(m) an environmental awareness plan describing the manner in which-</p> <ul style="list-style-type: none"> (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
9.	Waste Management Plan	-
10.	Emergency Preparedness Plan	-
11.	Monitoring Programme	<p>(g) the method of monitoring the implementation of the impact management actions contemplated in paragraph (f);</p> <p>(h) the frequency of monitoring the implementation of the impact management actions contemplated in paragraph (f);</p> <p>(j) the time periods within which the impact management actions contemplated in paragraph (f) must be implemented;</p> <p>(k) the mechanism for monitoring compliance with the impact management actions contemplated in paragraph (f);</p> <p>(l) a program for reporting on compliance, taking into account the requirements as prescribed by the Regulations;</p>
12.	EMPr	<p>(f) a description of proposed impact management actions, identifying the manner in which the impact management objectives and outcomes contemplated in paragraphs (d) and (e) will be achieved, and must, where applicable, include actions to -</p> <ul style="list-style-type: none"> (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 (iv) comply with any provisions of the Act regarding financial provisions for rehabilitation, where applicable;

3 DETAILS OF THE EAP

Prism EMS have been appointed to undertake the required Environmental Authorisation process in terms of the 2014 Environmental Impact Assessment (EIA) Regulations. Details and expertise of the Environmental Assessment Practitioner (EAP) who prepared the EMPr is provided in **Table 3-1** and Curriculum Vitae is appended in Appendix I2 of the Basic Assessment Report.

Table 3-1.: Details of the EAP.

EAP:	Vanessa Stippel
Company:	Prism Environmental Management Services
Qualifications:	MSc. Ecology, Environment and Conservation
Experience:	9 years
Affiliation/ Registration	Professional Member of Southern African Institute of Ecologists and Environmental Scientists SACNASP Pr.Sci.Nat. (116221) Registered EAP (2019/175)
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Prism EMS Team				
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Principal EAP	De Wet Botha (17 years' Experience)	MA. Env. Man. (PHED)	South African Council for Natural Scientific Professions (SACNASP) registered Scientist Pr.Sci.Nat. (119979) Registered Member of Environmental Assessment Practitioners Association of South Africa (EAPASA)(2019/1209) Member of the International Association for Impact Assessors (IAIAsa) (1653) Member of the Gauteng Wetland Forum Member of the South African Wetland Society	Project Director and Wetland Specialist

4 PROJECT DESCRIPTION AND ACTIVITIES, ASPECTS, AND IMPACTS

4.1 Project Description

The development will be phased and not all planned infrastructure and facilities will be constructed during the first phase however the following facilities will be developed throughout all phases:

- Truck Facilities;
- Car Facilities;
- 4x4 Facilities;
- Taxi Show Room;
- Production Centre;
- Panel and Paint Workshop;
- Vehicle Rental facilities; and
- Vehicle Storage Parking.

A summary of the phases are provided below.

4.1.1 Phase 1

Phase 1 of the proposed development involves the development of three erven as follows:

- **Erf 1** | Business 1 for a vehicle dealership, workshops, service facility and associated uses.
 - This will involve the development and operation of facilities for new and uses vehicle showing, servicing, rental, parking, washing, preparation and administration of vehicles.
 - The relevant services and roads will be put in place.
 - In addition, complementary uses such as offices, workshops, canteens, change rooms/ablutions, wash bays, spray painting bays, valet stores, guard houses and safety facilities and refuse areas, oil
 - Sufficient formal parking will be provided and the site will be landscaped with indigenous trees, shrubs and plants.
- **Erf 2** | Parking and subservient uses
 - This area will be formalized to provide for formal parking area to support vehicle preparation.
- **Erf 3** | Agricultural purposes
 - During the first phase, the remainder of the site will not be developed and will be maintained as is.

The layout of the Phase 1 is provided in **Figure 4-1** below.

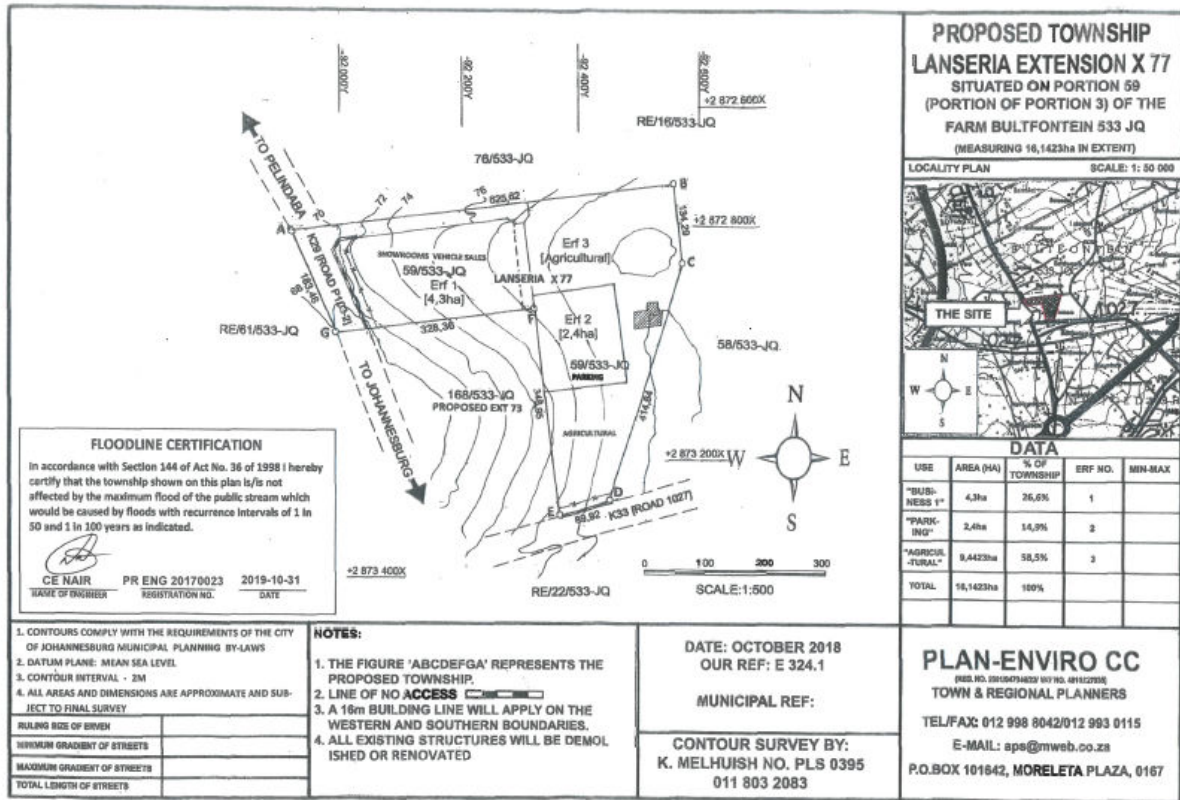


Figure 4-1: Development Layout

4.1.2 Phase 2

The second phase of the development involves the development of a car rental and panel and paint workshop and 4x4 megaworld. These will be developed at a later stage when required.

A preliminary site plan is provided in Figure 4-2 and shows both phases.

The aim of this preliminary plan is to provide an indication of the development footprint and its relationship to environmental sensitivities. It should however be noted that this SDP can only be finalized during the townplanning approval process and once the details of phase 2 are confirmed. **A copy of the final SDP will then be submitted to GDARD.**



Figure 4-2: Preliminary Site Plan for both phases

4.1.3 Oil Storage

As the dealership and facilities are required for showing, servicing, rental, parking, washing, preparation and administration of vehicles, oil storage will be required. Twelve separate tanks of 5000 l each will therefore be required at the various dealerships.

4.1.4 Services

Associated services and access will also be put in place as follows:

- Water will be required to service the proposed site. Water to the new site is proposed to be obtained by teeing off the existing 160 mm dia AC water pipe situated adjacent to the northern boundary of Ptn 59 of the Farm Bultfontein, 533-JQ as well as utilising the water from the existing Bore Hole. This proposed connection would be through a 110mm diameter pipe. Internal reticulation for feeding fire hydrants will also be through 110 mm diameter pipes. Water requirements will be 81.71 kl/day. However, in order to reduce water consumption, Grey water recycling plants are planned for the car wash and truck wash areas. After the initial priming of the system, the total average water demand would reduce to 67,27 kl/d. Construction shall be in accordance with the Johannesburg Water guidelines and the relevant SANS1200 guidelines.

- In terms of Sewer services, the average sewer flow is estimated to be 40.34 kl/day. The buildings will be reticulated with 110 mm pipes which will feed into the main 160 mm pipe, which will connect to the sewer conservancy tank. Construction shall be in accordance with the Johannesburg Water guidelines and the relevant SANS1200 guidelines. The conservancy tank which is designed to have a seven (7) day storage capacity (based on average flow) before requiring emptying. Seven (7) prefabricated plastic conservancy tanks ('Calcamite' or similar approved) are proposed with a combined storage volume of 311.5 kl.
- The Car Wash facility and Truck Wash facility are proposed to have Greywater Recycle Plants. A 10 kl Package Greywater Recycle Plant is proposed at the Car Wash facility ('Calcamite GreyWater 20' or similar approved) and a 5 kl Package Greywater Recycle Plant is proposed at the Truck Wash facility ('Calcamite Grey Water 10' or similar approved). Grey Water is drained via grid inlets at the wash bays and returned into the recycling plant (intercepted by sand oil grease traps).
- In order to ensure water from the truck wash bays is sufficiently dealt with, the water used at the wash bays will be drained via grid inlets at the various locations and is reticulated via 300 mm dia. HD uPVC Class 34 pipes to Prefabricated traps viz. 2 no. 'Calcamite' 3 KL Sand, Grease and Oil Traps (or similar approved) at the Truck Wash Bay.
- In terms of stormwater, bulk drainage is achieved by a network of grid inlets, catchpits and reticulation pipework. The roadways shall be drained by catchpit inlets (Type S2, D3) situated at road edge. The forecourt area shall be drained by grid inlet manholes.
- Bulk stormwater pipes shall be Spigot and Socket Concrete Pipes with rolling rubber rings to ensure watertightness. The intercepted flows are reticulated to the Sand Oil Grease Traps. The concrete pipe sizes vary from 375 mm dia. up to 900 mm dia. depending on the flow accumulation.
- The flow is reticulated into the Sand Oil Grease Traps to filter the stormwater and is then diverted to the attenuation tank. The flow then leaves the attenuation tank and is reticulated to a new stormwater headwall via a 900 mm dia. pipe and discharged overland in a North Westerly direction on to the road surface. The headwall apron slab has splitter blocks and a "stilling basin" is formed with a combination of reno mattresses and gabion boxes to further dissipate the velocity and energy of the flow. These interventions also provide erosion control.
- Electricity will be obtained from Eskom. The buildings will comply with NHBRC standards (SANS 10400) for energy efficiency. As part of this, the following measures will be put in place:
 - Energy saving measures for water heating (for example heat pumps or solar);
 - LED lamps;
 - General control switching (to minimise use of lights when not needed); and
 - Energy saving appliances.
- Further, solar panels may be put in place (if feasible). This would involve the placement of solar panels over the parking areas which would provide approximately 15 to 20 megawatts.

4.1.5 Access, Roads and Parking

A Traffic Impact Assessment has been undertaken and provides the detailed requirements for access to the site, parking and necessary intersection upgrades. These include:

- The access is to be used by both light and heavy vehicle's and should be designed as follows:
 - Two (2) ingress lanes (3,5 m wide lane for light vehicle's only and a 4,5 m wide lane for both heavy and light vehicle's).
 - One (1) egress lane (4,5 m wide lane for both heavy and light vehicle's).
 - The access control device is to be set back at least 30,0 m from the internal road.
 - The bell mouth radii as illustrated on Figure 4-3 below.
 - The proposed access is to be designed according to the Johannesburg Roads Agency (JRA) Roads and Stormwater design guidelines together with the Urban Transport Guideline (UTG 10) for the geometric design of commercial and industrial local streets commercial and industrial local streets.
 - It is proposed that access road to the site be upgraded as follows:
 - The road pavement is to be surfaced and layer-works designed to accommodate heavy vehicle's (car carriers)
 - The site will be able accommodate 1812 parking bays. The parking bays will be 90 degrees, having dimensions of 5,0 m long by 2,5 m wide and a minimum aisle width of 7,5 m. This is in line with the DOT (1995) parking standards. Safe pedestrian crossings and walkways should be provided to direct pedestrians between pedestrian accesses, parking areas and the buildings.
- Upgrades to Pelindaba Road and Access Road Intersection (Intersection 1) are also required as follows:
 - A dedicated short right-turn lane (30,0 m) is required at the east approach (access road)
 - The existing lane at the east approach is to be converted to a shared left and through lane
 - A dedicated short right-turn lane (30,0 m) is required at the west approach
 - The existing lane at the west approach is to be converted to a shared left and through lane
- Further, it is proposed that 2,0 m wide paved sidewalk be provided along the site frontage which will ease and formalise the movement of pedestrians between the site access and public transport facilities.

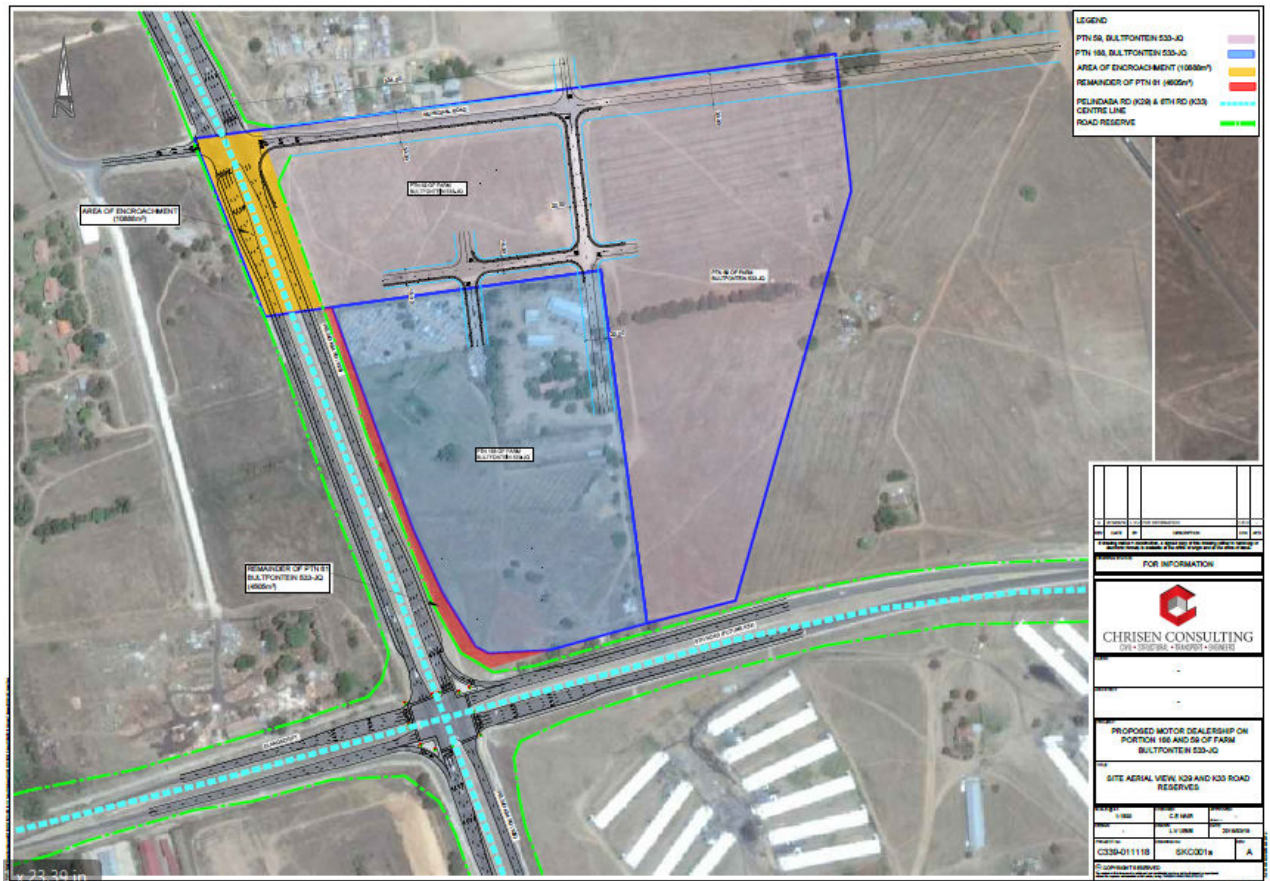


Figure 4-3: Access

4.1.6 Timeframes

The proposed development will be constructed in line with the following timeframes, see Table 4-1.

Table 4-1: Operational hours for construction phases.

Period	Open	Close
Weekdays	07:00	18:00
Saturdays	07:00	15:00
Sunday	Only when required	
Public holidays	Only when required	

4.1.7 Ancillary Infrastructure Required for Construction

No major infrastructure is required on site for the construction of the development. The required ancillary infrastructure for the purposes of supporting services is discussed below.

4.1.7.1 Security

A construction camp will be erected on site for the duration of the construction. This camp will be fenced for security purposes. A security guard will also be posted on site during non-operational times. A wall will be erected around the property boundary as part of the development project.

4.1.7.2 Sanitation

During the construction phase of the project, chemical toilets will be placed on site for the duration of the construction phase.

4.1.7.3 Construction Camp and Laydown Areas

Designated areas will be established during the construction phase for construction equipment and vehicles. These will all be located outside the 32m buffer of the wetland.

5 ENVIRONMENTAL SENSITIVITY

Figure 5-1 provides an overview of overall sensitivity of the study area. The following should be noted:

- A Baseline Ecological Habitat Status Assessment was undertaken and found that the site itself is degraded and transformed. It thus has a low-moderate (shown in **orange**) and low sensitivity (shown in **brown**). No specific sensitive areas from an ecological perspective need to be taken into account other than the locations of the *Hypoxis* species (in **purple**). Prior to construction, the ECO must undertake a detailed site walk to ensure that all *Hypoxis* species are identified. The Search, Rescue and Relocation Plan included in the Appendix 13 must be implemented.
- According to the Heritage Impact Assessment, there is a Feature on site which may be greater than 60 years in age. This building cannot be developed/demolished until the age of the building has been confirmed to be younger than 60 years old or approval from SAHRA has been received for such demolition (shown in **black** below).

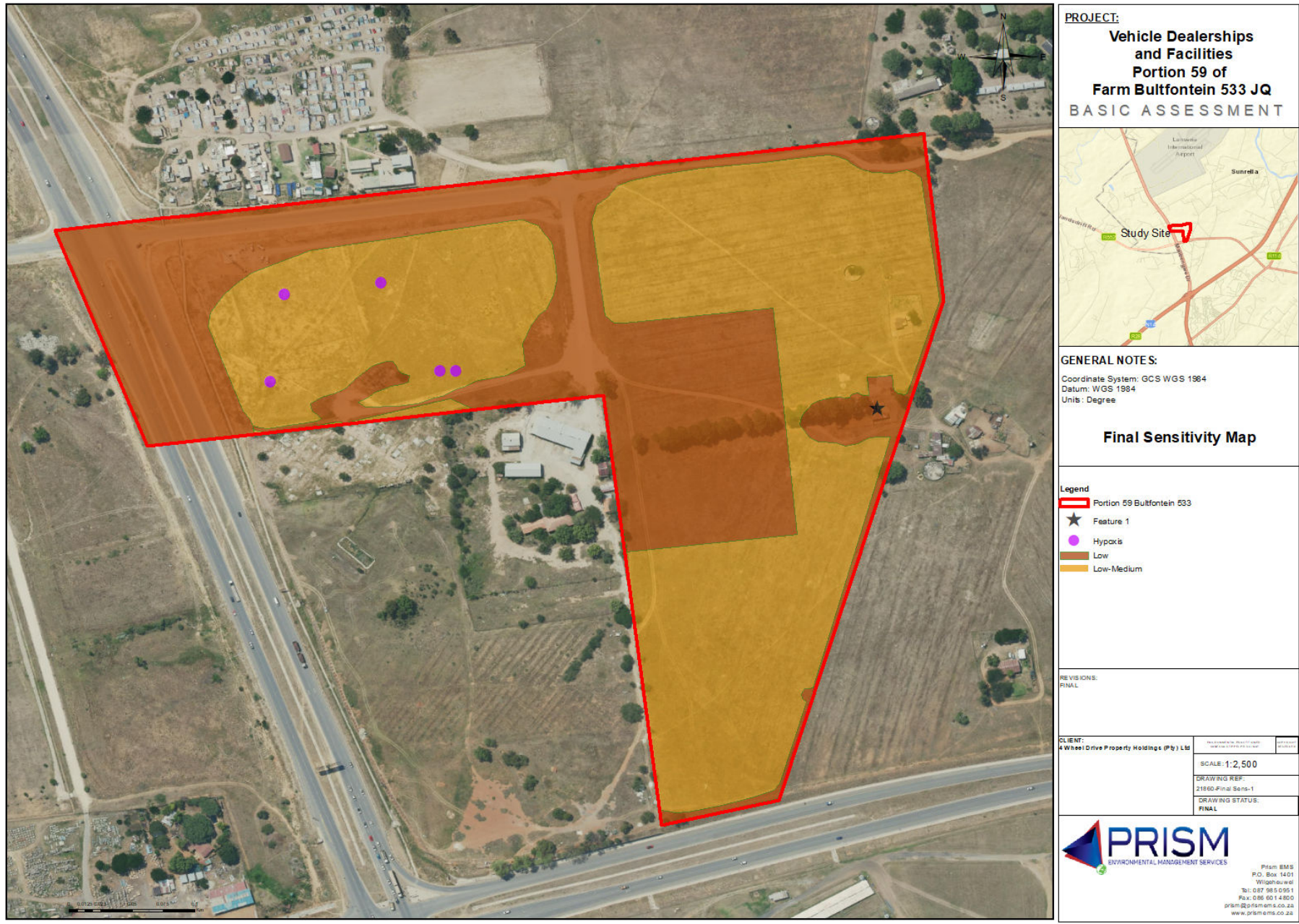


Figure 5-1: Overall Sensitivity Map

6 GOALS AND OBJECTIVES

The **EMPr** provides performance criteria required to address potential environmental impacts during the construction and operational phases of the proposed development.

This document incorporates the relevant recommendations of the Basic Assessment Report and other environmental studies and at a high level aims to provide the following:

- Establish **management objectives** for the Development in order to enhance benefits and minimise adverse environmental impacts;
- Describe **actions** required to achieve management objectives; and
- Outline institutional structures and roles required to implement the EMPr.

6.1 Key Objectives of the EMPr

The key objectives of the EMPr for the construction and operation phases of the proposed Development are as follows:

- To ensure effective communication with stakeholders and regulatory authorities;
- To ensure good housekeeping practices and general neatness on site;
- To mitigate any possible negative impacts identified in the EMPr for the construction and operational phase of the development;
- To prevent pollution to the receiving environment that may emanate directly or indirectly from the source (development activities) both during the construction and operational phases;
- To preserve flora and fauna;
- To preserve topsoil for optimal rehabilitation and landscaping following construction;
- To control the establishment of alien invasive plants during the construction phase of the project, as well as following rehabilitation of designated construction camp areas within the site thereafter.
- To ensure water saving and recycling mechanisms are implemented and adhered to;
- To ensure that all legislative requirements are met by the proposed development.

Following each site visit an audit report must be compiled to relay any non-compliance issues that need to be addressed, as well as compliance matters.

6.2 Impact Management Outcomes

Through effective implementation of the environmental management measures, the following outcomes must be achieved:

- All relevant authorisations, licences and approvals are in place prior to the commencement of construction.
- A formal document control system is in place to ensure all relevant documents are in place prior to commencement.

- Site specific method statements are compiled and approved.
- Proper management of sensitive features through identification and barricading.
- Planning and layout of construction site is undertaken responsibly to ensure protection of sensitive environmental features.
- Environmental awareness creation and training is undertaken prior to construction commencement to minimise environmental impacts and ensure compliance to relevant legislation and authorisations.
- Ensure that all possible causes of dust are mitigated as far as possible to minimise impacts to the surrounding environment
- All vehicles/plant on site must be properly maintained to reduce emission sources.
- Ensure that noise disturbance to surrounding areas are minimised and that construction activities comply with the Noise Control Regulations and the provisions of South African National Standards; Environmental, Health and Safety (EHS) Guidelines, World Health Organisation (WHO, 2002).
- Construction activities are managed correctly to ensure no negative impacts to water quality. This includes proper management of ablution facilities, workshop and equipment and concrete batching and mixing.
- Ensure minimal impacts to the flow regime of the wetland through poor stormwater management
- Ensure minimal impact to wetland habitat
- Ensure minimal impact to wetland biota
- Ensure that minimal disturbance of geomorphology during construction
- Domestic waste must be managed properly to ensure minimal impacts.
- Construction waste must be managed properly to ensure minimal impacts.
- Hazardous waste must be managed properly to ensure minimal impacts.
- Effective management of topsoil, in order to minimise the impact of construction activities.
- Changes to topography to be planned properly to prevent negative impacts.
- Ensure that all possible causes of erosion are mitigated as far as possible to minimise impacts to the site and surrounding environment
- Ensure that all possible causes of soil pollution are mitigated as far as possible to minimise impacts to the site and surrounding environment
- Electricity reduction mechanisms to be implemented.
- Water conservation mechanisms to be implemented.
- Fuel conservation mechanisms to be implemented.
- Raw materials conservation mechanisms to be implemented.
- No loss of habitat outside the approved footprint.
- Minimal disturbance to fauna occurs during construction.
- Ensure that minimal disturbance of ecological systems and natural corridors takes place during construction.
- Ensure that minimal disturbance of ecological life cycles due to noise and lighting.
- Ensure proper management of alien invasive species
- Minimise potential pollution incidents due to construction.
- A safe working environment for contractors/construction workers and the public is provided.

- Effective and safe storage of hydrocarbons on site, in order to minimise the
- impact of hydrocarbons on the environment
- Minimise potential fire incidents during construction.
- Proper management of construction activities to minimise disturbance to visual environment.
- Proper management of labour force is undertaken to ensure that there are no security-related issues or disturbance to tenants or landowners outside the construction footprint.
- Minimal disturbances to traffic due to road upgrades.
- No adverse impact on the historical and cultural inheritance of the area.
- Proper management of construction activities to minimise disturbance to sense of place.
- Preferential use of local contractors and suppliers.
- Proper management of labour force is undertaken to ensure that there is optimal use of local labourers and local contractors.
- Adequate reinstatement and rehabilitation of construction areas
- Residential development must comply with acceptable noise levels.
- Proper maintenance of connection to sewer line and proper management of stormwater
- Ensure Stormwater is properly managed
- Limited impact to habitat during operation
- Limited impact to biota during operation
- Limited impact to geomorphology during operation
- Proper management of waste.
- Ensure that all possible causes of erosion are mitigated as far as possible to minimise impacts to the site and surrounding environment
- Minimal loss of vegetation to fire
- Minimal disturbance of fauna during operation
- Minimal disturbance of ecological life cycles during operation
- Proper management of pollution sources to prevent pollution incidents on site.
- Minimise potential impacts/incidents
- Minimal safety and security issues.
- Minimal traffic disturbances related to the operation of the dealership.
- Preferential use of local contractors and suppliers.
- Proper management of labour force is undertaken to ensure that there is optimal use of local labourers and local contractors.

7 GENERAL ROLES AND RESPONSIBILITIES

There are various role players that are involved in responsible environmental management. An overview of the applicable role players and institutional arrangements are provided in **Figure 7-1**. Information on each role player is then provided in the subsections below.

7.1 Competent Authorities

Due to the fact that the proposed development takes place in Gauteng and activities are triggered in terms of the EIA Regulations, 2014 (National Environmental Management Act, 1998 (NEMA), the Gauteng Department of Agriculture and Rural Development (GDARD) is the relevant competent authority. A Water Use Licence is also required for Section 21 (a) and (g) uses from the Department of Human Settlements, Water and Sanitation (DHSWS).

7.1.1 Gauteng Department of Agriculture and Rural Development (GDARD)

GDARD is the mandated authority in terms of NEMA that determined whether an Environmental Authorisation (EA) will be issued for the project, following a decision-making process conducted as part of the EIA. Conditions will be included in the EA, which need to be complied with by the project applicant. The EMPr will need to be updated to take into account these conditions.

GDARD also fulfils a compliance and enforcement role with regards to the EA. The Department may perform random inspections to check compliance. GDARD will also review the monitoring and auditing reports compiled by the ECO.

Amendments may be required to the EMPr, based on adaptive management to the site conditions and the technical requirements of the project. These amendments will need to be approved by GDARD.

7.1.2 Department of Human Settlements, Water and Sanitation (DHWS)

The Department of Human Settlements, Water and Sanitation (DHWS) is the mandated authority in terms of the National Water Act, 1998 and will be responsible for issuing the Water Use Licence (WUL). The WUL, should it be issued, will include a number of conditions which will need to be complied with. As an integrated process is required, this EMPr also includes the management of the water resource and as above, the EMPr should be updated to include the conditions of the WUL.

DHSWS will also be responsible for the compliance and enforcement of the conditions of the WUL and they also perform inspections or audits to check compliance. Copies of the necessary monitoring reports will also need to be submitted to Regional office.

Any amendments to the WUL would also need to be approved by DHSWS.

7.2 Authorisation Holder

4 Wheel Drive Property Holdings (Pty) Ltd. is the applicant in terms of NEMA and is ultimately responsible for the development and implementation of the EMPr and ensuring that the conditions in the EA are satisfied. The liability for non-compliance also rests with the Authorisation Holder. Details of the Authorisation holder are contained in **Table 7-1**.

Table 7-1.: Details of the Applicant.

Applicant:	4 Wheel Drive Property Holdings (Pty) Ltd
Contact Person:	Matt Steyn

7.3 Consultants

7.3.1 Project Manager

In order to ensure that the proposed development is constructed as per the relevant designs and requirements, a project manager will be responsible for managing the planning, design and construction phases of the project. The Project Manager will furthermore also be required to tend to any environmental matters at the request of the Environmental Control Officer (ECO). The Project Manager shall assist the ECO where necessary and shall have the following responsibilities in terms of the implementation of the EMPr:

- Regular site inspections;
- Reviewing and approving the Contractor's Method Statements;
- Assisting the Contractor in finding environmentally responsible solutions to problems with input from the ECO where necessary; and
- Communicating all environmental issues to the ECO.

7.4 Contractors

Contractors will be responsible for constructing the proposed Development and associated infrastructure. All contractor/s employed by the developer in respect of any aspect of the construction of the subject site, will be bound by all and any agreement between the developer and the contractor, to ensure compliance with the Environmental Authorisation, mitigating measures included in the Specialist Studies, as well as this EMPr. The responsibilities include:

- Taking full responsibility for each of his/her employees.
- Be familiar with the contents of the EMPr and the specifications contained herein.
- Comply with the Environmental Specifications contained in the EMPr and subsequent revisions.
- Confirm legislative requirements for the construction works and ensure that appropriate permissions and permits have been obtained before commencing activities.
- Prepare Method Statements, programme of activities and drawings/plans for submission to the ECO when requested.
- Undertake daily site inspections to monitor environmental performance and compliance with the Environmental Specifications.

- Notify the ECO immediately in the event of any accident or infringements of the Environmental Specifications and ensure appropriate remedial action is taken.
- Notify the ECO at least 10 working days in advance of any activity he has reason to believe may have significant adverse environmental impacts, with specific reference to blasting, so that mitigatory measures may be implemented timeously.

7.5 Independent ECO

A competent and independent ECO must be appointed and will undertake weekly inspections with monthly reporting on site as well as biyearly auditing against the EMPr and EA. The aforementioned report must be submitted to 4 Wheel Drive Property Holdings Pty) Ltd. and GDARD for their records.

The ECO will also check the following:

- The record of environmental incidents (spills, impacts, legal transgressions, etc.) as well as corrective and preventive actions taken;
- The public complaints register in which all complaints are recorded, as well as actions taken; and
- Results from the environmental monitoring programme (water quality etc.).

In terms of Audits, the ECO will be required to ensure the following:

- All documentation (e.g. audit/monitoring/compliance reports and notifications) required to be submitted to the Department in terms of the EA.
- The holder of the EA must submit an environmental audit report to the Department within 30 days of the completion of the construction phase (i.e. within 30 days of site handover) and within 30 days of completion of rehabilitation activities.
- The Environmental Audit Report must indicate the date of the audit, the name of the auditor and the outcome of the audit in terms of compliance with the EA conditions as well as the requirements of an approved EMPr.
- Records relating to monitoring and auditing must be kept on site and made available for inspection to any relevant and competent authority in respect of this development.

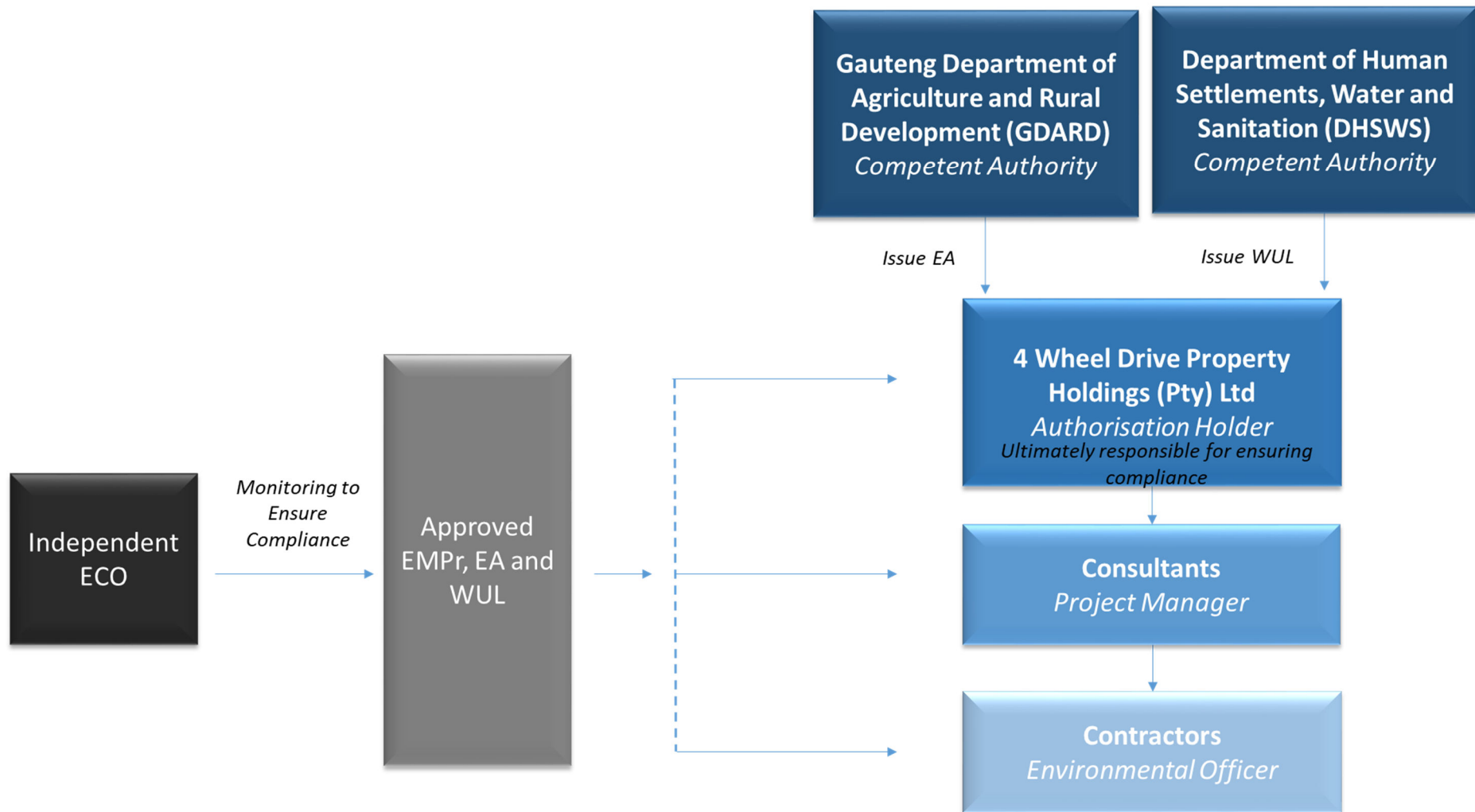


Figure 7-1: Roles and responsibilities.

8 ENVIRONMENTAL AWARENESS PLAN

Training aims to create an understanding of environmental management obligations and prescriptive measures governing the execution of the project. It is generally geared towards project team members that require a higher-level of appreciation of the environmental management context and implementation framework for the project. In contrast, **Environmental Awareness Creation** strives to foster a general attentiveness amongst the construction workforce to sensitive environmental features and an understanding of implementing environmental best practices. The Environmental Awareness Plan for the Development incorporates both training and environmental awareness to ensure that the proposed development is implemented in line with the requirements of the EMPr and that environmental sensitivities on site are managed correctly.

As part of this, 4 Wheel Drive Property Holdings (Pty) Ltd. is committed to remaining responsible and accountable for environmental practices on site. Being accountable for environmental practices undertaken during working tasks and activities remain the responsibility of both employer and employee awareness of the potential environmental impacts that could result from these activities.

All potential incidents to the environment may be effectively minimised through effective training and awareness of the employees using any of the following methods:

- Supervisory meetings (weekly);
- Induction training (annually);
- EMP Training (annually); and
- External environmental and/or health and safety courses (when applicable).

These methods are discussed below in more detail.

8.1 Meetings

Weekly supervisory meetings are ideal to facilitate awareness of specific environmental dangers pertaining to each week. Various topics may be discussed during these meetings and must be recorded or logged. All attendees at each meeting must sign an attendance register, these records must be kept on file at the administration office. Topics for discussion may include:

- Topics applicable to the entire operation;
- Area specific topics (e.g. heritage); and
- General environmental awareness:
 - Waste management
 - Spillages
 - Saving water
 - Electricity consumption
 - Dust control
 - Noise generation

- Housekeeping
- Indigenous Vegetation
- Alien vegetation
- Fire-making

Should issues be identified by the ECO, these can also be addressed during these weekly meetings.

8.2 EMPr Training

Aspects of the EMPr must be selected and discussed at training workshops at least annually. Such training topics may be focused around the incidents that are frequently reported during the previous year and may be focused around the following:

- Hydrocarbon spillages;
- Stormwater Control;
- Waste Management;
- Monitoring Protocols; and
- Safety topics.

Workers should be informed that they may refuse work that is harmful to human health and/or the environment.

8.3 Induction Training

All new employees are required to undergo induction training prior to commencement of work. Returning and existing employees must undergo repeat induction training at least annually. Environmental awareness training must form part of the induction and must include the basic topics relating to the environment:

- Main environmental legislation (e.g. NEM:WA¹ or NWA²);
- Constitutional right pertaining to the environment;
- Waste Management hierarchy;
- Environmental, social and economic concerns;
- Sensitive environmental features; and
- Prevention of poaching.

¹ National Environmental Management Waste Act (NEM:WA), 2008 (Act No. 59 of 2008)

² National Water Act (NWA), 1998, (Act No. 36 of 1998)

9 WASTE MANAGEMENT PLAN

In order to ensure waste is properly dealt with, waste management is included in the EMPr. In addition, a **Waste Management Plan** is discussed below.

9.1 Legal Requirements

Section 16 of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008), as amended states that –

“A holder of waste must, within the holder’s power, take all reasonable measures to –

- *Avoid the generation of waste and where such generation cannot be avoided, to minimise the toxicity and amounts of waste that are generated;*
- **Reduce, reuse, recycle and recover waste;**
- *Where waste must be disposed of, ensure that the waste is treated and disposed of in an environmentally sound manner;*
- *Manage the waste in such a manner that it does not endanger health or the environment or cause a nuisance through noise, odour or visual impacts;*
- *Prevent any employee or any person under his or her supervision from contravening this Act;*
- *Prevent the waste from being used for any unauthorised purpose.*

Only temporary storage of waste is allowed (once of storage of waste for a period less than 90 days). The volume of material should be limited to less than 100m³ of general waste and less than 80m³ of hazardous waste. Should this be exceeded the Norms and Standards for the Storage of Waste will need to be complied with.

9.2 Waste Hierarchy

Management objectives provided in this EMPr are aligned to the waste management hierarchy indicated in Figure 9-1.

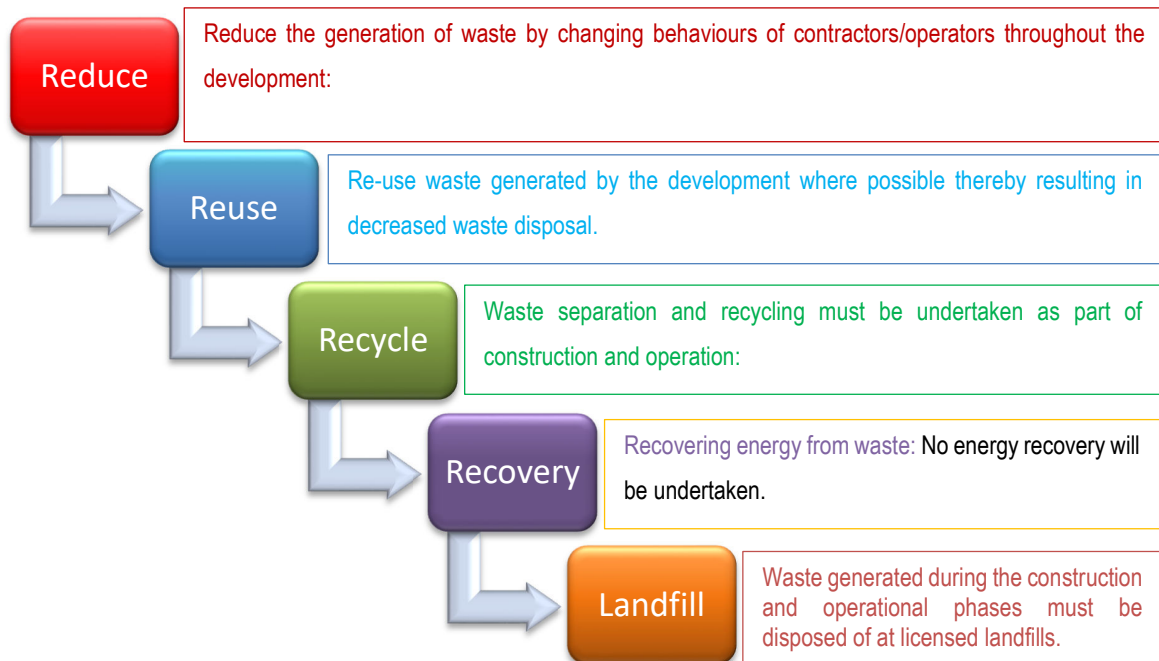


Figure 9-1: Waste Hierarchy.

9.3 Waste Management Actions

The following waste management actions must be implemented in order to ensure the objectives included in the waste hierarchy above are met.

9.3.1 Waste Avoidance and Reduction

Avoidance and reduction should be practiced wherever possible. Recommended actions include: but are not limited to:

- Bulk buying of materials to reduce the volume of packaging required.
- Avoidance of materials/items/brands that are heavily packaged, have a short lifespan or are low quality.
- Buying items that last longer and can be repaired.
- Buying items in refillable containers.
- Environmental awareness training should focus on management of waste and all construction workers should be aware of the importance of waste minimisation and avoidance.

9.3.2 Recycling

Recycling should be practiced whenever waste prevention or reuse is not possible, provided that any such recycling is cost effective, taking into consideration environmental benefits, financial costs and community interests.

Potential priority recyclable waste streams include:

- Used Oil;
- Paper;
- Glass;
- Tyres;
- Plastics;
- Building rubble; and
- Electronic waste.

The following actions must be implemented:

- To reduce or avoid the need for sorting after collection, the categories of distinctively marked waste receptacles must be provided in order to receive waste as it is generated.
- These receptacles shall be fitted with a tight cover.
- All types of waste collection receptacles shall be clearly marked with the type of waste they are receiving.
- Obtain and label recycling containers for office waste, aluminium, steel, glass, ferrous metals, nonferrous metals, waste timber.
- Locate these containers within office buildings and trailers.
- Establish a recycled material collection schedule.
- Arrange full bins to be hauled away.

9.3.3 Waste Disposal

The contractor is responsible for removal of all waste from the site, generated through the contractor's activities. The contractor shall ensure that all waste is removed to an appropriately licensed waste management facilities (the following source may be utilised – www.sawic.org.za). During operation, waste that is not collected for recycling must be collected by the municipality or by a municipality approved 3rd party collector.

In addition, it should be noted that the classification of waste determines the handling methods and the ultimate disposal of the material. All **hazardous waste** that may be generated by construction and operation must be managed as follows:

- Characterise the waste to determine if it is general or hazardous (Use the Appendix 1 of the Norms and Standards for the Classification of Waste for landfill to determine whether additional classification is required).
- Obtain and provide an acceptable container with a label.
- Place hazardous waste material in the container.
- Inspect the container on a regular basis.

- Haul the full container to the licenced and correct disposal site.
- Provide documentary evidence of proper disposal of the waste.

In addition, the following actions must also be undertaken:

- Provide waste skips on site. These skips should be sufficient in number, the skip storage area should be kept clean, skips should be emptied and replaced before overflowing or spillage occurs.
- Skips should be covered to prevent waste blowing away.
- Vermin / weatherproof bins will be provided in sufficient numbers and capacity to store domestic waste. These bins must be kept closed to reduce odour build-up and emptied regularly to avoid overfilling and other associated nuisances.
- Ensure that solid waste is transported so as to avoid waste spills en-route.
- No waste shall be buried or burned anywhere on the site.
- Permits to transport/dispose of waste must be in place.

10 EMERGENCY PREPAREDNESS PLAN

10.1 Potential Emergencies

The following potential emergencies that may occur on site include:

- Environmental Incidents:
 - Fuel and hydrocarbon spillages; and
 - Fire Hazards.
- Safety Incidents:
 - Injuries related to operation of heavy machinery such as Front-End Loaders, Excavators, Mobile Crushers etc. during construction;
 - Driving related accidents and incidents from Trucks on site during construction;
 - Accidents during earth moving, levelling and rehabilitation activities; and
 - Criminal incidents such as theft or potential violent crime during construction and operation.

10.2 Emergency Plan

10.2.1 Emergency Assemblage Area

A central area on site must be demarcated with appropriate signage for the gathering of all employees and visitors on site in the event of an emergency.

10.2.2 Emergency Procedures

The following procedures must be compiled in order for the identified potential emergencies to be managed effectively:

- Drill and evacuation procedure for any emergency related incidents containing information on the following:
 - Reporting structure for all incidents
 - Emergency contact information (e.g. telephone numbers)
 - Procedure to be followed for the specific emergency
 - First Aid information
- Spillages of fuel and hydrocarbons:
 - Immediate action plan (e.g. use of spill kits) to prevent spill for spreading
 - Reporting of incident to manager and supervisor to advise on next steps
- Procedure for Theft and Crime:
 - Details on security system on site
 - Emergency response units
 - Panic alarms
 - Details of community response units

10.2.3 Emergency Contact Information

A list of potential emergency contact centers specific to the area must be drawn up and displayed on common notice boards for all employees to access. The following emergency centers must be sourced:

- Nationwide emergency response;
- Cellphone Emergency;
- Ambulance;
- Hospitals;
- Fire Response; and
- Police.

This list must be checked and updated at least quarterly to ensure that the information remains up to date.

11 MONITORING PROGRAMME

Monitoring is required to ensure that the receiving environment at the proposed Development is suitably safeguarded against the identified potential impacts, and to ensure that the environmental management requirements are adequately implemented and adhered to during the execution of the project.

The method of monitoring the implementation of the management and mitigation measures stipulated within the EMPr are indicated in **Table 11-1**.

Table 11-1: Method of monitoring implementation of EMPr

Method	Frequency	Responsibility	Main Topics	Outcome
Internal Inspections	Daily – Weekly	Project Manager	<ul style="list-style-type: none"> Observe housekeeping practices Check for spillages, leaks or any other sources of pollution Observe waste management Observe stormwater control 	<ul style="list-style-type: none"> Based on observations identify need for protocols / procedures and compile where needed in order to comply with EMPr Verbally inform employees on any identified issues
External Inspections	Weekly	ECO	<ul style="list-style-type: none"> Check compliance with management measures in EMPr 	<ul style="list-style-type: none"> Based on observations identify need for protocols / procedures and compile where needed in order to comply with EMPr Verbally inform employees on any identified issues. Information from inspections will be used to compile monthly report. Photos from inspections to be utilised in monthly reporting.
External audits	Annual	ECO	<ul style="list-style-type: none"> Check compliance with management measures in EMPr 	<ul style="list-style-type: none"> Compile audit report with recommendations / actions where non-compliance was identified

Method	Frequency	Responsibility	Main Topics	Outcome
Management Meetings	Quarterly – Bi-annually	Management	<ul style="list-style-type: none"> Discuss (problem solve) recurring issues or actions that require management intervention 	<ul style="list-style-type: none"> Record minutes of main points of discussion Implement outcome actions of meeting

11.1 Compliance Monitoring and Auditing

11.1.1 Environmental Audits

The mechanism for monitoring compliance with the management and mitigation measures stipulated within the EMPr must include an audit undertaken by an independent Environmental Control Officer (ECO) as discussed in Section 7.5.

The objective of the environmental audit is to:

- Report on the level of compliance with the conditions of the environmental authorisation and the management and mitigation measures stipulated within the EMPr;
- The extent to which the avoidance, management and mitigation measures provided in Section 12 achieve the objectives and outcomes in Section 6;
- Identify and assess new impacts and risks as a result of undertaking the activities;
- Evaluate the effectiveness of the management and mitigation measures generated in the EMPr;
- Identify shortcomings in the EMPr;
- Identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr.

11.1.2 Procedure

The following methodology or procedure is to be used for assessment of the management and mitigation measures of the EMPr:

- **Pre-site preparation:** prior to the site inspection a review of the management measures contained in the EMPr, and a checklist must be drawn up.
- **Site inspection:** the Development must be traversed on foot and must include an assessment of each major component of the facility.
- **Documentation review:** after the site inspection a documentation review must be undertaken by requesting specific key documentation relating to the proposed development.

11.1.3 Evaluation Criteria

During evaluation of the EMPr, the following criteria must be used:

- Management measures stipulated in the plan;
- Environmental monitoring required;
- Legal requirements; and
- Best practice observations.

The scores and description used in the evaluation of the EMPr are indicated in Table 11-2. Where any indication of non-compliance is determined, recommended actions will be provided.

Table 11-2: Description of scoring during evaluation of the findings.

Score	Evaluation	Description
N/A	Not Applicable	Not applicable and will not be implemented or discussed/assessed.
0	Major Non-Compliance	Relates to the absence of a requirement needed to be implemented or the total breakdown of a process. A number of minor non-compliances listed against the same requirement may represent a total breakdown of a process and thus could collectively be a major non-compliance.
1	Minor Non-Compliance	The requirement is partially implemented or non-compliant.
2	Observation	Relates to a matter about which the Assessor is concerned but which cannot be clearly stated as non-compliance. Observations also indicate trends which may result in a future non-compliance.
3	Compliant	The project management plans and procedures are executed in a managed fashion (planned, tracked, verified and adjusted) based upon defined activities, inputs and outputs. Objective evidence is available for each process.

11.1.4 Reporting

All inspections undertaken as part of internal / external auditing must be provided in the form of a report. External audits will be submitted to the competent authority as required by the EIA Regulations, 2014.

11.2 Penalties

In order to ensure that there is adequate motivation for the contractor to comply with the conditions set out in the EMPr, the following applies with regards to penalties:

- The Contractor will comply with the environmental requirements on an ongoing basis, and any failure on their part to do so will entitle the Project Manager, in consultation with the Environmental Manager and ECO, to certify the imposition of a fine subject to the details set out in the EMPr.
- The Project Manager, Environmental Manager and any other specific personnel as designated by the Project Manager may alter the Schedule of Fines for this specific project.
- Fines may be issued per incident at the discretion of the Project Manager. Such fines will be issued in addition to any remedial costs incurred as a result of noncompliance with the requirements of the EMPr and documents supporting thereof. Fines may be omitted from construction guarantees as supplied by the contractor.
- The Project Manager and ECO will be the judge as to what constitutes a transgression in terms of the above clause. Further, note that in the event that transgressions continue to an unacceptable level the client may cancel the contract.
- Where the Contractor inflicts non-repairable damage upon the environment or fails to comply with any of the environmental requirements, he will be liable to pay a penalty fine over and above any other

contractual consequence. This may also lead into a Rectification Application in terms of Section 24G of the NEMA, which could lead to certain fines and / or prosecution.

- The Contractor is deemed NOT to have complied with this specification if:-
 - Within the boundaries of the site, site extensions and access roads there is evidence of contravention of the requirements of the EMPr.
 - Environmental damage ensues due to negligence.
 - The Contractor fails to respond adequately to complaints from the public.
 - Legal action is instituted against the developer in terms of Environmental laws due to any action / activities undertaken by the Contractor.
- Payment of any fines in terms of the contract will not absolve the offender from being liable from prosecution in terms of any law.
- A record of penalties will be maintained within the procurement department, and may influence later commissions awarded to the contractor.

12 EMPr

12.1 Pre-Construction

General requirements during the pre-construction phase include the following:

- Design to consider and incorporate environmental requirements
- Define and communicate roles and responsibilities for the implementation of the EMPr;
- Ensure that all structures within the construction area are identified and recorded;
- Determine and document the road conditions; and
- Develop and implement an environmental awareness programme.

Specific management measures related to the identified environmental aspects follow:

Table 12-1: Management measures to be implemented during pre-construction.

Potential Impact	Management Objective	Proposed Mitigation Measures/Management Actions	Frequency	Institutional Responsibility
LEGISLATIVE REQUIREMENTS AND DOCUMENT CONTROL				
General Requirements	All relevant authorisations, licences and approvals are in place prior to the commencement of construction.	<ul style="list-style-type: none"> • Approvals to be in place prior to construction. 	Once off prior to construction	Project Manager
	A formal document control system is in place to ensure all relevant documents are in place prior to commencement.	<ul style="list-style-type: none"> • An environmental file/document control system must be designed and put in place. • Prior to construction, the following documents must be included in the file: <ul style="list-style-type: none"> ○ WUL ○ EMPr ○ EA 	Once off prior to construction	Project Manager
	Site specific method statements are compiled and approved.	<ul style="list-style-type: none"> • Based on the EMPr, the contractor must compile specific method statements which must be approved by the Project manager prior to construction. At a minimum this should include: <ul style="list-style-type: none"> ○ Method Statement for site clearing; ○ Method Statement for establishing the construction camp; ○ Method Statement with regard to waste and wastewater management; ○ Method Statement to show procedures for dealing with possible emergencies that can occur, such as fire and accidental leaks and spillage of carbon fuels and oils; ○ Method Statement for dust control; ○ Method Statement for the storage and handling of hazardous substances; ○ Method Statement for controlling alien invasive species and noxious weeds; and ○ Method Statement for rehabilitation of construction footprint. 	Prior to construction	EO to compile Project manager to approve

Potential Impact	Management Objective	Proposed Mitigation Measures/Management Actions	Frequency	Institutional Responsibility
BARRICADING OF SENSITIVE FEATURES				
Loss/disturbance of sensitive features	Proper management of sensitive features through identification and barricading.	<ul style="list-style-type: none"> Prior to construction, a site walk must be undertaken by the ECO and all <i>Hypoxis hemerocallidea</i> must be identified and demarcated. The Search, Rescue and Relocation Plan included in Appendix 13.1 must be implemented. 	Once off prior to construction	ECO/Specialist
Loss/disturbance of heritage	Proper management of potential heritage resources prior to construction as per the requirements of the Heritage Specialist.	<ul style="list-style-type: none"> Note: No significant heritage resources were identified during the specialist study. However should Feature 1 require demolition, the age will need to be determined and if over 60 years, a demolition permit will be required. 	Once off prior to construction	ECO/Heritage Specialist
SITE PLANNING AND LAYOUT				
Loss/disturbance of sensitive features	Planning and layout of construction site is undertaken responsibly to ensure protection of sensitive environmental features.	<ul style="list-style-type: none"> Contractor to submit a site plan to the ECO and Project Manager for comment. The site plan must be approved by the Project Manager prior to the establishment of the site. The plan must show the following): <ul style="list-style-type: none"> Sensitive environmental features; Buildings and structures; Contractors' camp and lay down areas; Site offices; Roads and access routes; Temporary waste storage areas Site toilets and ablutions; Topsoil stockpiles areas; Construction materials stores areas; Workshops; and Hazardous substance stores. Authorised construction footprint to be pegged Ablution facilities must be located at outside 32m buffer area. 	Once off prior to construction	Contractor to compile plan, ECO to comment, Project Manager to approve.
ENVIRONMENTAL AWARENESS CREATION – INDUCTION				
General Requirements	Environmental awareness creation and training is undertaken prior to construction commencement to	<ul style="list-style-type: none"> ECO to induct relevant contractor managers at the start of the project. This induction should provide an overview of the authorisation and the EMPr. The environmental awareness training course for management shall include all management and foremen. 	Once off prior to construction	ECO to induct construction managers/ Environmental officer (EO)

Potential Impact	Management Objective	Proposed Mitigation Measures/Management Actions	Frequency	Institutional Responsibility
	<p>minimise environmental impacts and ensure compliance to relevant legislation and authorisations.</p>	<ul style="list-style-type: none"> • The Contractor must arrange that all of his employees and those of his sub-contractor go through the project specific environmental awareness induction before the commencement of construction and as and when new staff or sub-contractors are brought on site. • A system must be in place to ensure all new employees have received training. • All attendees shall remain for the duration of the course and sign an attendance register that clearly indicates participant's names on completion. A copy of the attendance register is to be retained by the ECO/Project Manager. 		<p>Contractor to induct all workers</p>

12.2 Construction

Mitigation measures for all activities related to construction are provided below. The mitigation measures included in the Baseline Ecological Status Assessment, Baseline Geohydrological Assessment and Heritage Impact Assessment undertaken as part of the Basic Assessment Report have also been incorporated below. Management actions are linked to a specific impact and overall management objective. Information on the institutional responsibilities and the frequency of the actions is also provided.

Table 12-2: Management measures to be implemented during construction.

Potential Impact	Project Activities	Management Objective	Proposed Mitigation Measures/Management Actions	Frequency	Institutional Responsibility
ATMOSPHERIC EMISSIONS					
Dust emissions	Site Clearing General construction activities	Ensure that all possible causes of dust are mitigated as far as possible to minimise impacts to the surrounding environment	<ul style="list-style-type: none"> A speed limit of 20km/h must be maintained on all dirt roads. Dust suppression by means of either water or biodegradable chemical agent is required. 	Daily	Contractor to implement actions ECO to monitor
Emissions from vehicles and equipment (CO ₂ , NO _x , SO _x , VOC's etc.)	Use of vehicles and plant during construction	All vehicles/plant on site must be properly maintained to reduce emission sources.	<ul style="list-style-type: none"> All vehicles used during the project should be properly maintained and in good working order. A maintenance schedule should be drawn up to ensure all vehicles are serviced at the proper interval. All vehicles and other machinery should comply with road worthy requirements and comply with legislation in terms of allowable emissions. 	As required by maintenance schedule	Contractor to implement actions ECO to monitor
NOISE					
Noise increase due to construction activities	General construction activities	Ensure that noise disturbance to surrounding areas are minimised and that construction activities comply with the Noise Control Regulations and the provisions of South African National Standards; Environmental, Health and Safety (EHS) Guidelines, World Health Organisation (WHO, 2002).	<ul style="list-style-type: none"> The provisions of SANS 10103:2008 will apply to all areas within audible distance of residents or adjacent landowners. Equipment and/or machinery which will be used must comply with the manufacturer's specifications on acceptable noise levels. Construction activities should be limited to daytime only. 	Daily	Contractor to implement actions ECO to monitor
DISCHARGE TO SURFACE WATER					
Water Quality/Sewage	Site Camp Workshop	Construction activities are managed correctly to ensure no negative	The proposed development does not fall near any surface water features. However the following general measures should be implemented.	Daily	Contractor to implement actions

Potential Impact	Project Activities	Management Objective	Proposed Mitigation Measures/Management Actions	Frequency	Institutional Responsibility
	Concrete mixing Construction activities	impacts to water quality. This includes proper management of ablution facilities, workshop and equipment and concrete batching and mixing.	<ul style="list-style-type: none"> • Toilets <ul style="list-style-type: none"> ○ Chemical toilets must be supplied and maintained during the construction phase ○ Ablution facilities (chemical toilets) are to be provided by the Contractor, at a ratio of 1:10. ○ Ablution facilities (chemical toilets) must be erected within 100m from all workplaces but within the development footprint. ○ Toilets are to be secured to the ground, and must have a closing mechanism. ○ Toilet paper must be provided at these facilities and must be serviced once per week. ○ Certified contractors to maintain and remove chemical toilets regularly. ○ The contractor must ensure that spillage does not occur when toilets are cleaned/serviced and contents must be properly stored and disposed of. ○ Discharge of waste into the environment and/or burial of waste are strictly prohibited. ○ Sanitary arrangements must be to the satisfaction of the PM, ECO, the local authorities and the applicable legal requirements. • Proper storage of hazardous material <ul style="list-style-type: none"> ○ Hazardous materials to be suitably stored to prevent environmental contamination and visual impacts. Storage requirements to be determined based on chemical qualities of material and Material Safety Data Sheets (MSDS). At a minimum, hazardous chemical substances (HCS) must be stored at a designated area that meets the following requirements: <ul style="list-style-type: none"> ▪ Earthed ▪ Fire extinguisher must be present ▪ Relevant signage to be displayed including No Smoking/ No open flames; Hazardous Chemical Substance Store; Type of HCS (e.g. Diesel); Maximum contents volume and Fire extinguisher 		ECO to monitor

Potential Impact	Project Activities	Management Objective	Proposed Mitigation Measures/Management Actions	Frequency	Institutional Responsibility
			<ul style="list-style-type: none"> ○ Storage areas should be located outside of the 32 buffer. ○ Hazardous substances must be stored and handled in accordance with the appropriate legislation and standards, which include the Hazardous Substances Act (Act No. 15 of 1973), the Occupational Health and Safety Act (No. 85 of 1993), relevant associated Regulations, and applicable SANS and international standards. ○ Any hazardous materials (apart from fuel) must be stored within a lockable store with a sealed floor. Suitable ventilation to be provided. ○ All storage tanks containing hazardous materials must be placed in bunded containment areas with impermeable surfaces. The bunded area must be able to contain 110% of the total volume of the stored hazardous material. ● Spillages <ul style="list-style-type: none"> ○ In the event of spillages of hazardous substances, the appropriate clean up and disposal measures are to be implemented. ○ The contractor must ensure that necessary materials and equipment are available on site to deal with spills of any hazardous materials present ○ The ECO and Project Manager must be notified of all significant spillages. ● Training <ul style="list-style-type: none"> ○ Staff that will be handling hazardous materials must be trained to do so. ● General <ul style="list-style-type: none"> ○ Drip trays must be placed under all vehicles when immobile for longer than 24 hours. Vehicles suspected of leaking must be monitored and conduct a pre-start-up inspection checklist. ○ Drip trays must be checked and replaced for vehicles standing (parked) for prolonged periods. 		

Potential Impact	Project Activities	Management Objective	Proposed Mitigation Measures/Management Actions	Frequency	Institutional Responsibility
			<ul style="list-style-type: none"> ○ Drip trays must be of a sufficient size and volume to collect any hydrocarbon leakages from a stationary vehicle. ○ Spill kits (absorbent material) must be available on site and in all vehicles that transport hydrocarbons for dispensing to other vehicles on the construction site. ○ Spilled substances must be contained in impermeable containers for removal to a licensed hazardous waste site. 		
Silt	Construction activities	Ensure minimal siltation of nearby watercourses and wetlands during construction.	<ul style="list-style-type: none"> ● The proposed development is not in close proximity to any watercourses or wetlands as such minimal impacts apply. The following best practise measures still apply: <ul style="list-style-type: none"> ○ Instability and erosion of steep slopes must be stabilised immediately. Re-vegetation in consultation with landscape architect and ECO should be done if required. ○ To reduce the loss of material by erosion, disturbance must be kept to a minimum. ○ If clearing of slopes occur within the rainy season, earth berms must be created along the up-slope side of the construction area. ○ Where possible, natural vegetation should be retained to reduce the risk of erosion. ○ Should erosion occur due to negligence on the part of the Contractor to apply the above measures, the Contractor will be responsible for reinstatement of the eroded area to its former state at his own expense. Any surface water pollution occurring as a result of this negligence will be cleaned up by the Contractor or a nominated clean up organisation at the expenses of the Contractor. ○ Proper Stormwater management must be implemented. ○ Run-off containing high sedimentation loads must not be released into natural or municipal drainage systems. 	Daily	Contractor to implement actions ECO to monitor

Potential Impact	Project Activities	Management Objective	Proposed Mitigation Measures/Management Actions	Frequency	Institutional Responsibility
			<ul style="list-style-type: none"> ○ Silt fences must be used to stabilise the site, reduce erosion and silt entering the natural environment. No unchecked silt may enter the natural environment. ○ Silt fences must be fit for purpose, effective and regularly maintained. 		
Surface water run-off	General construction activities	Ensure stormwater is properly managed during construction.	<ul style="list-style-type: none"> ● Storm water management during construction will be implemented however, as the proposed development does not cross any watercourses and is not in close proximity to any wetlands, minimal impacts are expected. Further, as a precaution, the following measures should be implemented: <ul style="list-style-type: none"> ○ Implement proper stormwater management plan. ○ Increased run-off during construction should be managed using berms, temporary cut-off drains, attenuation ponds or other suitable structures, in consultation with the ECO and resident Engineer. ○ Cut off drains may not cause additional harm to environment. Care must be taken to consider their position and the receiving environment. ○ Stormwater management system is to be installed as soon as possible following site establishment, to attenuate stormwater during the construction phase, as well as during the operational phase. ○ Surface-water run-off and stormwater must be directed away from trenches and areas of excavation. 	Daily	Contractor to implement actions ECO to monitor
Contamination of surface and ground water from hazardous substances	Site Camp Storage areas	Effective and safe management of hazardous materials on site, to minimise the impact of materials on the environment.	<ul style="list-style-type: none"> ● The proposed development does not cross any watercourses and is not in close proximity to any wetlands as such minimal impacts apply. An existing borehole is in place. Further, the following measures must be implemented: ● Proper storage of hazardous material <ul style="list-style-type: none"> ○ Hazardous materials to be suitably stored to prevent environmental contamination and visual impacts. Storage requirements to be determined 	Daily	Contractor to implement actions ECO to monitor

Potential Impact	Project Activities	Management Objective	Proposed Mitigation Measures/Management Actions	Frequency	Institutional Responsibility
			<p>based on chemical qualities of material and Material Safety Data Sheets (MSDS). At a minimum, hazardous chemical substances (HCS) must be stored at a designated area that meets the following requirements:</p> <ul style="list-style-type: none"> ▪ Earthed ▪ Fire extinguisher must be present ▪ Relevant signage to be displayed including No Smoking/ No open flames; Hazardous Chemical Substance Store; Type of HCS (e.g. Diesel); Maximum contents volume and Fire extinguisher <ul style="list-style-type: none"> ○ Hazardous substances must be stored and handled in accordance with the appropriate legislation and standards, which include the Hazardous Substances Act (Act No. 15 of 1973), the Occupational Health and Safety Act (No. 85 of 1993), relevant associated Regulations, and applicable SANS and international standards. ○ Any hazardous materials (apart from fuel) must be stored within a lockable store with a sealed floor. Suitable ventilation to be provided. ○ All storage tanks containing hazardous materials must be placed in bunded containment areas with impermeable surfaces. The bunded area must be able to contain 110% of the total volume of the stored hazardous material. <ul style="list-style-type: none"> • Spillages <ul style="list-style-type: none"> ○ In the event of spillages of hazardous substances, the appropriate clean up and disposal measures are to be implemented. ○ The contractor must ensure that necessary materials and equipment are available on site to deal with spills of any hazardous materials present ○ The ECO and Project Manager must be notified of all significant spillages. • Training 		

Potential Impact	Project Activities	Management Objective	Proposed Mitigation Measures/Management Actions	Frequency	Institutional Responsibility
			<ul style="list-style-type: none"> ○ Staff that will be handling hazardous materials must be trained to do so. ● General <ul style="list-style-type: none"> ○ Drip trays must be placed under all vehicles when immobile for longer than 24 hours. Vehicles suspected of leaking must be monitored and conduct a pre-start-up inspection checklist. ○ Drip trays must be checked and replaced for vehicles standing (parked) for prolonged periods. ○ Drip trays must be of a sufficient size and volume to collect any hydrocarbon leakages from a stationary vehicle. ○ Spill kits (absorbent material) must be available on site and in all vehicles that transport hydrocarbons for dispensing to other vehicles on the construction site. ○ Spilled substances must be contained in impermeable containers for removal to a licensed hazardous waste site. ○ Contaminated wastewater to be contained, and removed to a registered site, to ensure water bodies on site are not contaminated. 		
Impact on groundwater availability and flow	Use of Borehole During Construction – general construction activities	Effective management of abstraction of groundwater to limit impacts to groundwater flow and existing users	<ul style="list-style-type: none"> ● 'During construction, water will be abstracted from the borehole until such time that the municipal connection is put in place. Geohydrological Baseline Assessment found that impacts are likely to be insignificant w.r.t the shallow weathered and fractured aquifers of the Swazian age rocks/ basement aquifer system, unlikely to impact third party groundwater users, should a 12-hour pump schedule be followed, and based on the expected drawdown extent not likely to impact on groundwater contribution to baseflow. In order to ensure this is the case: <ul style="list-style-type: none"> ○ Enforce water saving strategies. ○ Environmental awareness training. ○ 12-hour pump schedule to be adhered to. ○ Existing borehole on site should be monitored for water levels (monthly) and qualities (quarterly). 	Daily	Contractor to implement actions ECO to monitor

Potential Impact	Project Activities	Management Objective	Proposed Mitigation Measures/Management Actions	Frequency	Institutional Responsibility
			<ul style="list-style-type: none"> ○ Recommended abstraction rate for the borehole should not be exceeded (0.45 L/s) 		
WASTE GENERATION					
Domestic Waste	Waste generation, storage and disposal	Domestic waste must be managed properly to ensure minimal impacts.	<ul style="list-style-type: none"> • Waste recycling to be put in place. • Domestic waste must be stored in containers labelled or colour coded for general waste. • Vermin / weatherproof bins will be provided in sufficient numbers and capacity to store domestic waste. • Containers must be emptied frequently before reaching capacity • Solid waste shall only be stored in the designated general waste storage area which must be enclosed and impermeable. • No waste shall be buried or burned anywhere on the construction site. • All solid waste shall be disposed of by a certified contractor, off-site, at an approved landfill site if no municipal services is available. The Contractor shall supply the ECO with a certificate of disposal for auditing purposes. • Avoidance, reduction and reuse should be practiced wherever possible – see waste management plan. • Waste may not cause any nuisance (e.g. odour) • Records of waste manifest documents must be retained at the administration office 	Daily	Contractor to implement actions ECO to monitor
Construction Waste	Waste generation, storage and disposal	Construction waste must be managed properly to ensure minimal impacts.	<ul style="list-style-type: none"> • Construction waste must be collected and put into suitable closed bins on a daily basis. • Provide waste skips on site. These skips should be sufficient in number, the skip storage area should be kept clean, skips should be emptied and replaced before overflowing or spillage occurs. Skips should be covered to prevent waste blowing away. • Construction rubble must be disposed of at a registered landfill site. 	Daily	Contractor to implement actions ECO to monitor

Potential Impact	Project Activities	Management Objective	Proposed Mitigation Measures/Management Actions	Frequency	Institutional Responsibility
			<ul style="list-style-type: none"> Avoidance, reduction, and reuse should be practiced wherever possible – see waste management plan. Records of waste manifest documents must be retained at the administration office. 		
Hazardous waste	Waste generation, storage and disposal	Hazardous waste must be managed properly to ensure minimal impacts.	<ul style="list-style-type: none"> The classification of waste determines the handling methods and the ultimate disposal of the material. The contractor shall manage hazardous waste that are anticipated to be generated by his operations as follows: <ul style="list-style-type: none"> Characterise the waste to determine if it is general or hazardous (Use the Appendix 1 of the Norms and Standards for the Classification of Waste for landfill to determine whether additional classification is required). Obtain and provide an acceptable container with a label. Place hazardous waste material in the container. Inspect the container on a regular basis Haul the full container to the licenced and correct disposal site. Provide documentary evidence of proper disposal of the waste. Only temporary storage of waste is allowed (once of storage of waste for a period less than 90 days). The volume of material should be limited to less than 80m³ of hazardous waste. Should this be exceeded the Norms and Standards for the Storage of Waste will need to be complied with. Containers must be emptied frequently before reaching capacity All hazardous waste must be disposed of at the nearest hazardous landfill Waste may not cause any nuisance (e.g. contamination) Records of waste manifest documents must be retained at the administration office 	Daily	Contractor to implement actions ECO to monitor

Potential Impact	Project Activities	Management Objective	Proposed Mitigation Measures/Management Actions	Frequency	Institutional Responsibility
			<ul style="list-style-type: none"> Certificates of registration must be retained for transporters of hazardous waste and retained in record at the administration office. 		
SOIL ALTERATION					
Loss of topsoil	Site clearing	Effective management of topsoil, in order to minimise the impact of construction activities.	<ul style="list-style-type: none"> During site preparation, topsoil and subsoil must be stripped separately from each other and must be stored separately from spoil material for use in the rehabilitation phase. Topsoil should be protected from wind and rain, as well as contamination from diesel, concrete or wastewater. Topsoil stockpiles should be checked on a monthly basis to ensure that this is the case. Topsoil should be used in landscaping and rehabilitation where possible. 	At start of construction. Checks to occur on a monthly basis	Contractor to implement actions ECO to monitor
Alteration of topography	Site clearing Landscaping Construction activities	Changes to topography to be planned properly to prevent negative impacts.	<ul style="list-style-type: none"> Changes to topography must be properly designed and landscaped. Stormwater management measures must be implemented to ensure these changes to not impact on stormwater. 	Ongoing	Contractor to implement actions ECO to monitor
Soil erosion	Site clearing Landscaping Construction activities	Ensure that all possible causes of erosion are mitigated as far as possible to minimise impacts to the site and surrounding environment	<ul style="list-style-type: none"> Instability and erosion of steep slopes must be stabilised immediately. Re-vegetation in consultation with landscape architect and ECO should be done if required. To reduce the loss of material by erosion, disturbance must be kept to a minimum. If clearing of slopes occur within the rainy season, earth berms must be created along the up-slope side of the construction area. Where possible, natural vegetation should be retained to reduce the risk of erosion. Should erosion occur due to negligence on the part of the Contractor, the Contractor will be responsible for reinstatement of the eroded area to its former state at his own expense. Any surface water pollution occurring as a result of this negligence will be cleaned up by the 	Ongoing	Contractor to implement actions ECO to monitor

Potential Impact	Project Activities	Management Objective	Proposed Mitigation Measures/Management Actions	Frequency	Institutional Responsibility
			Contractor or a nominated clean up organisation at the expenses of the Contractor.		
Soil pollution	Site camp Storage of materials Ablution facilities Storage of Waste Workshop area	Ensure that all possible causes of soil pollution are mitigated as far as possible to minimise impacts to the site and surrounding environment	<ul style="list-style-type: none"> All vehicle/equipment maintenance and washing must be done in the workshop area, equipped with a bund wall and grease trap oil separator. Workshop area must be monitored for fuel and oil spills. Spills must be cleaned up immediately and remediated to the satisfaction of the ECO and PM. Spill kits must be comprehensive and available on site at all times. An adequate supply of absorbent material must be available to accommodate emergency spills. Also see mitigation measures related to water quality and storage of hazardous material. 	Ongoing	Contractor to implement actions ECO to monitor
RESOURCE CONSUMPTION					
Electricity consumption	General site activities	Electricity reduction mechanisms to be implemented.	<ul style="list-style-type: none"> Enforce electricity reduction strategies Environmental awareness training 	Ongoing	Contractor to implement actions ECO to monitor
Water consumption	General site activities	Water conservation mechanisms to be implemented.	<ul style="list-style-type: none"> Enforce water saving strategies. Environmental awareness training. 12-hour pump schedule to be adhered to. Existing borehole on site should be monitored for water levels (monthly) and qualities (quarterly). Recommended abstraction rate for the borehole should not be exceeded (0.45 L/s) 	Ongoing	Contractor to implement actions ECO to monitor
Fuel consumption	Fuelling of plant, vehicles and generators	Fuel conservation mechanisms to be implemented.	<ul style="list-style-type: none"> Record and monitor fuel consumption regularly Reduce theft of fuel (increase security) 	Ongoing	Contractor to implement actions ECO to monitor
Raw materials consumption	General construction activities requiring raw materials	Raw materials conservation mechanisms to be implemented.	<ul style="list-style-type: none"> Promote effective use of raw materials. 	Ongoing	Contractor to implement actions ECO to monitor

Potential Impact	Project Activities	Management Objective	Proposed Mitigation Measures/Management Actions	Frequency	Institutional Responsibility
EFFECTS ON BIODIVERSITY					
Loss of habitat due to Clearing due to digging and laying foundations , Construction camps & lay down areas and Stochastic events such as fire	Site clearing Construction activities.	No loss of habitat outside the approved footprint.	<ul style="list-style-type: none"> • Proper management of site establishment: <ul style="list-style-type: none"> ○ Locate construction camp in area where sensitive environmental features will not be impacted on. The location should be approved by the ECO, Project Manager and EO. ○ Construction camp should be fenced, and access control should be exercised. ○ The extent of the site should by all means be limited, to avoid any additional clearance of vegetation ○ Construction and laydown areas should be established outside of the wetland 32m buffer. • Fires shall only be permitted in specially designated areas and under controlled circumstances. • Proper management of site clearing: <ul style="list-style-type: none"> ○ Restrict site clearing activities to construction area /domain. ○ Clearing of vegetation to be conducted in a phased manner (where possible). • All laydown, storage areas etc should be restricted to within the Project area and all access roads must be kept within this area or from existing access roads. • A qualified environmental control officer must be on site when construction begins to identify species that will be directly disturbed and to relocate fauna/flora that is found during construction (including all reptiles and amphibians). • Areas that are denuded during construction need to be re-vegetated with indigenous vegetation to prevent erosion during flood events. This will also reduce the likelihood of encroachment by alien invasive plant species. • Compilation of and implementation of an alien vegetation management plan for the entire site. • It is recommended that all <i>Hypoxis hemerocallidea</i> species should be removed prior to construction activities and either relocated to a similar type of environment or implemented within the landscaping plan of the proposed 	Ongoing	Contractor to implement actions ECO to monitor

Potential Impact	Project Activities	Management Objective	Proposed Mitigation Measures/Management Actions	Frequency	Institutional Responsibility
			development. A Search, Rescue and Relocation plan has been compiled and should be implemented.		
Direct Mortality of Fauna and Flora - Staff or construction workers poaching and hunting, Intentional killing of fauna and Vegetation and ground clearing	Site clearing Construction activities.	Minimal disturbance to fauna occurs during construction.	<ul style="list-style-type: none"> • It is recommended that all <i>Hypoxis hemerocallidea species</i> should be removed prior to construction activities and either relocated to a similar type of environment or implemented within the landscaping plan of the proposed development. Refer to Search, Rescue and Relocation Plan. • No sensitive faunal species were identified on site and the Ecological Specialist noted that the site is disturbed. The following recommendations by the specialist will be implemented: <ul style="list-style-type: none"> ○ Snaring and hunting of fauna by construction workers on or adjacent to the study area are strictly prohibited. ○ Killing of fauna on or adjacent to the study area are strictly prohibited. Should any fauna species be found on site, the ECO should be conducted asap to provide recommendation or mitigation measures. <p>In addition, the following general requirements should be adhered to:</p> <ul style="list-style-type: none"> ○ Before construction starts, construction workers must be educated with regards to littering and poaching. ○ Environmental awareness training should be provided to contractors regarding disturbance to animals. Particular emphasis should be placed on talks regarding snakes. 	Ongoing	Contractor to implement actions ECO to monitor
Disruption of ecological life cycles due to the restriction of species movement	Site clearing Construction activities.	Ensure that minimal disturbance of ecological systems and natural corridors takes place during construction.	<ul style="list-style-type: none"> • The Ecological Specialist noted that the site is disturbed. The following recommendations by the specialist will be implemented: <ul style="list-style-type: none"> ○ Trenches and other linear barriers should not be kept open for too long, especially not staying open over night. 	Ongoing	Contractor to implement actions ECO to monitor

Potential Impact	Project Activities	Management Objective	Proposed Mitigation Measures/Management Actions	Frequency	Institutional Responsibility
			<ul style="list-style-type: none"> ○ Stormwater and road infrastructure should be designed in such a way that it will have minimal impact on the environmental features. ● In addition, the following should be undertaken: <ul style="list-style-type: none"> ○ All laydown, storage areas etc should be restricted to within the Project area; ○ Areas that are denuded during construction need to be re-vegetated with indigenous vegetation to prevent erosion during flood events. This will also reduce the likelihood of encroachment by alien invasive plant species. ○ Compilation of and implementation of an alien vegetation management plan for the entire site. 		
Disruption of ecological life cycles due to noise and lighting	Site clearing Construction activities.	Ensure that minimal disturbance of ecological life cycles due to noise and lighting.	<ul style="list-style-type: none"> ● Construction must be restricted to hours of 07:00 and 17:00. Should construction activities need to continue over a weekend/public holiday or is expected to be excessively noisy, all Interested and Affected Parties and the ECO must be notified in advance. 	Ongoing Contractor to implement actions	ECO to monitor
Introduction of alien flora affecting native faunal assemblages	Site clearing Construction activities.	Ensure proper management of alien invasive species	<ul style="list-style-type: none"> ● Compilation of and implementation of an alien vegetation management plan for the entire site. ● 'Alien, invasive species found within the construction area should be eradicated as far as possible and disposed of at a registered site. ● Measures to prevent siltation from entering the wetland area, should be implemented throughout the construction phase. 	Ongoing Contractor to implement actions	ECO to monitor
INCIDENTS, ACCIDENTS, AND POTENTIAL EMERGENCY SITUATIONS					
Pollution incidents	Workshop Site Camp Storage of Hazardous material Use of plant and vehicles	Minimise potential pollution incidents due to construction.	<ul style="list-style-type: none"> ● Proper emergency response procedure to be in place for dealing with spill or leaks at the construction site. ● Ensure that the necessary materials and equipment for dealing with spills and leaks are available on site, where practicable. ● Remediation of the spill areas will be undertaken to the satisfaction of the Project Manager. 	Daily	Contractor to implement actions ECO to monitor

Potential Impact	Project Activities	Management Objective	Proposed Mitigation Measures/Management Actions	Frequency	Institutional Responsibility
			<ul style="list-style-type: none"> In the event of a hydrocarbon spill, the source of the spillage will be isolated and contained. The area will be cordoned off and secured. The Contractor will ensure that there is always a supply of an appropriate absorbent material readily available to absorb, breakdown and where possible, encapsulate a minor hydrocarbon spillage. All staff on site will be made aware of actions to be taken in case of a spillage. Provide contact details of person to be notified in a case of spillages – signage to be displayed at strategic points within the construction domain (e.g. workshop, fuel storage area, hazardous material containers). 		
Health and safety	General construction activities	A safe working environment for contractors/construction workers and the public is provided.	<ul style="list-style-type: none"> Appointed Safety Agent. Contractor to submit a Health and Safety Plan, prepared in accordance with the Health and Safety Specification, for approval prior to the commencement of work. All construction personal must be clearly identifiable. All employees must also be issued with employee cards for identification purposes. All workers will be supplied with the required Personal Protective Equipment as per the Occupational Health and Safety Act (Act No. 85 of 1993). Fencing and barriers will be in place in accordance with the Occupational Health and Safety Act (Act No. 85 of 1993). Applicable notice boards and hazard warning notices will be put in place and secured. Night hazards will be indicated suitably (e.g. reflectors, lighting, traffic signage). Maintain access control to prevent access of the public to the construction areas, as far as practicable. 24-hour security and access control. Health and Safety awareness training. A Dedicated Occupational Health and Safety system to be implemented by Contractor's Safety Officer. To be monitored and audited by the Client's Safety Agent, in terms of the Construction Regulations (2003). 	Appointment and Plan – once off at start, other actions, ongoing	Contractor to implement actions ECO to monitor

Potential Impact	Project Activities	Management Objective	Proposed Mitigation Measures/Management Actions	Frequency	Institutional Responsibility
Storage of hydrocarbons	Storage of fuel Site Camp Workshop areas	Effective and safe storage of hydrocarbons on site, in order to minimise the impact of hydrocarbons on the environment	<ul style="list-style-type: none"> • Proper storage of hydrocarbons <ul style="list-style-type: none"> ○ Storage requirements to be determined based on chemical qualities of material and Material Safety Data Sheets (MSDS). At a minimum, hazardous chemical substances (HCS) must be stored at a designated area that meets the following requirements: <ul style="list-style-type: none"> ▪ Earthed ▪ Fire extinguisher must be present ▪ Relevant signage to be displayed including No Smoking/ No open flames; Hazardous Chemical Substance Store; Type of HCS (e.g. Diesel); Maximum contents volume and Fire extinguisher • Storage areas should be located 100m from the edge of wetlands. • Hazardous substances must be stored and handled in accordance with the appropriate legislation and standards, which include the Hazardous Substances Act (Act No. 15 of 1973), the Occupational Health and Safety Act (No. 85 of 1993), relevant associated Regulations, and applicable SANS and international standards. • Any hazardous materials (apart from fuel) must be stored within a lockable store with a sealed floor. Suitable ventilation to be provided. • All storage tanks containing hazardous materials must be placed in bunded containment areas with impermeable surfaces. The bunded area must be able to contain 110% of the total volume of the stored hazardous material. • Spillages <ul style="list-style-type: none"> ○ In the event of spillages of hazardous substances, the appropriate clean up and disposal measures are to be implemented. ○ The contractor must ensure that necessary materials and equipment are available on site to deal with spills of any hazardous materials present 	Ongoing	Contractor to implement actions ECO to monitor

Potential Impact	Project Activities	Management Objective	Proposed Mitigation Measures/Management Actions	Frequency	Institutional Responsibility
			<ul style="list-style-type: none"> ○ The ECO and Project Manager must be notified of all significant spillages. 		
Fire	Storage of fuel Site Camp Workshop areas General Construction Activities	Minimise potential fire incidents during construction.	<ul style="list-style-type: none"> • Appropriate emergency response to be in place for dealing with fire at the construction site. • All fire control mechanisms (firefighting equipment) will be routinely inspected by a qualified investigator for efficacy thereof and be approved by local fire services. • All staff on site will be made aware of general fire prevention and control methods, and the name of the responsible person to alert to the presence of a fire. • Burning of waste is not permitted. • Suitable precautions will be taken (e.g. suitable fire extinguishers, water bowsers, welding curtains) when working with welding or grinding equipment. • Designated smoking areas should be provided, with special bins for discarding of cigarette butts 	Ongoing	Contractor to implement actions ECO to monitor
SOCIAL					
Visual impact	General Construction activities Site camp	Proper management of construction activities to minimise disturbance to visual environment.	<ul style="list-style-type: none"> • Suitable screening to be put in place during construction to minimise visual impacts. • No littering to be allowed. • Good housekeeping practices to be followed 	Ongoing	Contractor to implement actions ECO to monitor
Safety and security	General construction activities	Proper management of labour force is undertaken to ensure that there are no security-related issues or disturbance to tenants or landowners outside the construction footprint.	<ul style="list-style-type: none"> • 24-hour access control to the site and 24-hour security. • Workers found to be engaging in activities such as excessive consumption of alcohol, drug use or selling of any such items on site must be disciplined. 	Ongoing	Contractor to implement actions ECO to monitor
Traffic disruptions	General construction activities	Minimal disturbances to traffic due to road upgrades.	<ul style="list-style-type: none"> • Traffic warning and calming measures will be put in place when construction activities may impact on traffic flow. 	Ongoing	Contractor to implement actions ECO to monitor

Potential Impact	Project Activities	Management Objective	Proposed Mitigation Measures/Management Actions	Frequency	Institutional Responsibility
Loss of cultural heritage	General Construction activities Site clearing	No adverse impact on the historical and cultural inheritance of the area.	<ul style="list-style-type: none"> • A Heritage Impact Assessment was undertaken, and the following mitigation measures recommended: <ul style="list-style-type: none"> ○ Confirmation of the age of Feature 1 is required and should it be older than 60 years, a permit from SAHRA will be required prior to demolition; and ○ Implementation of a chance find procedure. <ul style="list-style-type: none"> ▪ If during the pre-construction phase, construction, operations or closure phases of this project, any person employed by the developer, one of its subsidiaries, contractors and subcontractors, or service provider, finds any artefact of cultural significance or heritage site, this person must cease work at the site of the find and report this find to their immediate supervisor, and through their supervisor to the senior on-site manager. ▪ It is the responsibility of the senior on-site Manager to make an initial assessment of the extent of the find and confirm the extent of the work stoppage in that area. ▪ The senior on-site Manager will inform the ECO of the chance find and its immediate impact on operations. The ECO will then contact a professional archaeologist for an assessment of the finds who will notify the SAHRA. 	Ongoing	Contractor to implement actions ECO to monitor
Loss of sense of place	General Construction activities Site camp	Proper management of construction activities to minimise disturbance to sense of place.	<ul style="list-style-type: none"> • Suitable screening to be put in place during construction to minimise visual impacts. • No littering to be allowed. • Good housekeeping practices to be followed. 	Ongoing	Contractor to implement actions ECO to monitor
ECONOMIC					
Decline/increase in economy	Supplier and contractor selection	Preferential use of local contractors and suppliers.	<ul style="list-style-type: none"> • Local contractors and suppliers to be used during the construction phase as far as possible. 	Ongoing	Contractor to implement actions ECO to monitor

Potential Impact	Project Activities	Management Objective	Proposed Mitigation Measures/Management Actions	Frequency	Institutional Responsibility
Employment	Employment of construction workers	Proper management of labour force is undertaken to ensure that there is optimal use of local labourers and local contractors.	<ul style="list-style-type: none"> Wherever possible labour, materials and services must be sourced locally. 	Ongoing	Contractor to implement actions ECO to monitor
REHABILITATION AND LANDSCAPING					
General	Rehabilitation and landscaping activities	Adequate reinstatement and rehabilitation of construction areas	<ul style="list-style-type: none"> In line with the requirements the National Environmental Management: Biodiversity Act (Alien and Invasive Species Regulations, 2014), the following must be undertaken: <ul style="list-style-type: none"> Eradicate all Listed Invasive Species (Category 1a), if present; Control all Listed Invasive Species (Category 1b), if present; Apply for a permit for all Listed Invasive Species (Category 2), if present; Apply for exemption for all Listed Invasive Species (Category 3), if present. After the construction phase, the area to be reinstated to the same or better condition than it was prior to construction. Clear and completely remove from site all construction plant, equipment, storage containers, temporary fencing, temporary services, and fixtures Ensure that all access roads utilised during construction are returned to a usable state and/or a state no worse than prior to construction. Inert waste and rubble <ul style="list-style-type: none"> Clear the site of all inert waste and rubble, including surplus rock, foundations and batching plant aggregates. After the material has been removed, the site shall be re-instated and rehabilitated. 	Ongoing	Contractor to implement actions ECO to monitor

Potential Impact	Project Activities	Management Objective	Proposed Mitigation Measures/Management Actions	Frequency	Institutional Responsibility
			<ul style="list-style-type: none"> ○ Remove from site all domestic waste and dispose of in the approved manner at a registered waste disposal site, or with a registered service provider. ● Hazardous waste and pollution control <ul style="list-style-type: none"> ○ Remove from site all pollution containment structures. ○ Remove from site all temporary sanitary infrastructure and waste water disposal systems. ○ Take care to avoid leaks, overflows and spills and dispose of any waste in the approved manner ● Control of Invasive Plant species: <ul style="list-style-type: none"> ○ Control invasive plant species and noxious weeds by means of extraction, cutting or other approved methods. ○ Encroachment of alien vegetation should be monitored regularly and controlled; the area must be kept clear of all invader plants as per the Conservation of Agricultural Resources Act, 1983 (Act No 43 of 1983). Rehabilitation measures must be employed until such a time as indigenous species is established. ○ As much vegetation growth as possible should be promoted within the proposed replacement in order to protect soils and to reduce the percentage of the surface area which is left as bare ground. In this regard special mention is made of the need to use indigenous vegetation species as the first choice during landscaping ● Landscaping <ul style="list-style-type: none"> ○ Make safe all excavations outside of the construction area by backfilling and grading, as required. ○ In general, no slopes steeper than 1(V):3(H) are permitted in cut-and-fill areas, unless otherwise specified by the landscaping plan. ○ Programme the backfill of excavations so that subsoil is deposited first, followed by the topsoil. 		

Potential Impact	Project Activities	Management Objective	Proposed Mitigation Measures/Management Actions	Frequency	Institutional Responsibility
			<ul style="list-style-type: none"> ○ Monitor backfilled areas for subsidence (as the backfill settles) and fill depressions using available material. ○ Shape the area surrounding the development to blend in with the surrounding landscape, where possible. Landscaping shall be done through the use of indigenous plant species, following water conscious design principles. ○ Ensure that no excavated material or stockpiles are left on site and that all material remaining after backfilling is landscaped to blend in with the surrounding landscape. ● Topsoil replacement and soil amelioration <ul style="list-style-type: none"> ○ Execute top soiling activity prior to the rainy season or any expected wet weather conditions. ○ Execute topsoil placement only after all construction work has ceased. ○ Replace and redistribute stockpiled topsoil together with herbaceous vegetation, overlying grass and other fine organic matter in all disturbed areas of the construction site, including temporary access routes. Replace topsoil to the original depth. ○ Place topsoil in the same area from where it was stripped. If there is insufficient topsoil available from a particular soil zone to produce the minimum specified depth, topsoil of similar quality may be brought from other areas of similar quality. ○ The suitability of substitute material will be determined by means of a soil analysis addressing soil fraction, fertility, pH and drainage. ○ Do not use topsoil suspected to be contaminated with the seed of alien vegetation. Alternatively, the soil is to be appropriately treated. ○ Ensure that storm water run-off is not channelled alongside the gentle mounding, but that it is taken diagonally across it. 		

Potential Impact	Project Activities	Management Objective	Proposed Mitigation Measures/Management Actions	Frequency	Institutional Responsibility
			<ul style="list-style-type: none"> ○ Shape remaining stockpiled topsoil not utilised elsewhere in an acceptable manner so as to blend in with the local surrounding area. ○ After topsoil placement is complete, spread available stripped vegetation randomly by hand over the top-soiled area ● Ripping and scarifying <ul style="list-style-type: none"> ○ Rip and/or scarify all areas following the application of topsoil to facilitate mixing of the upper most layers. Whether ripping and/or scarifying is necessary will be determined based on the site conditions immediately before these works begin. ○ Rip and/or scarify all disturbed areas (and other specified) 		

12.3 Operation

Mitigation measures for all activities related to operation are provided below. Management actions are linked to a specific impact and overall management objective. Information on the institutional responsibilities and the frequency of the actions is also provided.

Table 12-3: Management measures to be implemented during operation.

Potential Impact	Project Activities	Management Objective	Proposed Mitigation Measures/Management Actions	Frequency	Institutional Responsibility
ATMOSPHERIC EMISSIONS					
Emissions from vehicles and equipment (CO ₂ , NO _x , SO _x , VOC's etc.)	General operational activities	Vehicles must be in good working condition	<ul style="list-style-type: none"> All vehicles and equipment used by the dealerships should be properly maintained and in good working order. All vehicles and other machinery should comply with road worthy requirements and comply with legislation in terms of allowable emissions. 	Ongoing	Authorisation Holder
NOISE					
Noise increase	General operational activities	Development must comply with acceptable noise levels.	<ul style="list-style-type: none"> The proposed residential development is in line with activities and uses in the area and will not provide significant noise pollution. The Body corporate should develop rules and regulations to manage noise in line with applicable by-laws. 	Ongoing	Authorisation Holder
SURFACE AND GROUND WATER					
Sewage	General operational activities	Ensure proper management of sewage on site.	<ul style="list-style-type: none"> The proposed development is not in close proximity to any watercourses or wetlands as such minimal impacts apply. A Water and Sanitation Services study has been undertaken and noted that sewer will be drained by 160mm diameter HD UPVC Class 34 pipes to a number of Sewer Conservancy tanks which are designed to have a 7-day storage capacity (based on average flow) before requiring emptying. The following mitigation applies: <ul style="list-style-type: none"> Management and maintenance of the Sewer Conservancy Tank must be by an experienced and competent person. Collection and disposal of sewer must be by an appropriate and registered third party collector. Disposal of sewer collected from the conservancy tank must take place at an appropriate and licenced facility. 	Ongoing	Authorisation Holder
Contamination of surface and ground water from hazardous substances	Spillages	Effective and safe management of hazardous materials spills	<ul style="list-style-type: none"> The proposed development does not cross any watercourses and is not in close proximity to any wetlands however an existing borehole is in place. As such minimal impacts apply. Further, the following measures must be implemented: <ul style="list-style-type: none"> Hazardous substances must be stored and handled in accordance with the appropriate legislation and standards, which include the Hazardous Substances Act (Act No. 15 of 	Ongoing	Authorisation Holder

Potential Impact	Project Activities	Management Objective	Proposed Mitigation Measures/Management Actions	Frequency	Institutional Responsibility
			<p>1973), the Occupational Health and Safety Act (No. 85 of 1993), relevant associated Regulations, and applicable SANS and international standards.</p> <ul style="list-style-type: none"> ○ Any hazardous materials (apart from fuel) must be stored within a lockable store with a sealed floor. ○ All storage tanks containing hazardous materials must be placed in bunded containment areas with impermeable surfaces. The bunded area must be able to contain 110% of the total volume of the stored hazardous material. ○ In the event of spillages of hazardous substances, the appropriate clean up and disposal measures are to be implemented. <ul style="list-style-type: none"> • Necessary materials and equipment must be available on site to deal with spills of any hazardous materials present. 		
Stormwater run off	General Operational activities	Limited impact due to surface water run off during operation	<ul style="list-style-type: none"> • 'A Stormwater management system to be implemented in line with the requirements of City of Johannesburg and the Stormwater Management Plan. 	Ongoing	Authorisation Holder
WASTE GENERATION					
Domestic Waste	Waste management	Proper management of waste.	<ul style="list-style-type: none"> • Recyclable waste streams must be separated from other waste streams. Waste to be separated into recyclable and non-recyclable waste. Waste separation needs to occur before waste is collected. • Solid waste shall only be stored in the designated general waste storage area which must be enclosed and impermeable. • All solid waste shall be disposed of by a certified contractor, off-site, at an approved landfill site if no municipal services are available. • Avoidance, reduction, re-use and recycling should be practiced wherever possible. 	Ongoing	Authorisation holder
Hazardous waste	Waste management	Proper management of hazardous waste.	<ul style="list-style-type: none"> • The only hazardous waste expected is empty containers which were used to store hazardous material as well as potentially used parts/oil from car and truck servicing • These containers will be collected by a third-party contractor and disposed of at a licenced hazardous facility. • Any hazardous waste will be stored in a designated waste storage container with appropriate labelling. 	Ongoing	Authorisation holder

Potential Impact	Project Activities	Management Objective	Proposed Mitigation Measures/Management Actions	Frequency	Institutional Responsibility
SOIL ALTERATION					
Soil erosion	General operational activities	Ensure that all possible causes of erosion are mitigated as far as possible to minimise impacts to the site and surrounding environment	<ul style="list-style-type: none"> Stormwater management system to be implemented to reduce erosion. Landscaping to minimise soil erosion. 	Ongoing	Authorisation holder
RESOURCE CONSUMPTION					
Electricity Consumption	General operational activities	Electricity reduction mechanisms to be implemented.	<ul style="list-style-type: none"> Electricity will be obtained from Eskom. The buildings will comply with NHBRC standards (SANS 10400) for energy efficiency. As part of this, the following measures will be put in place: <ul style="list-style-type: none"> Energy saving measures for water heating (for example heat pumps or solar); LED lamps; General control switching (to minimise use of lights when not needed); and Energy saving appliances. Further, solar panels should be investigated and put in place if feasible. 	Ongoing	Authorisation holder
Water Consumption	General operational activities	Water conservation mechanisms to be implemented.	<ul style="list-style-type: none"> Enforce water saving strategies. Environmental awareness training. 12-hour pump schedule to be adhered to. Existing borehole on site should be monitored for water levels (monthly) and qualities (quarterly). Recommended abstraction rate for the borehole should not be exceeded (0.45 L/s) 	Ongoing	Authorisation holder
Fuel Consumption	General operational activities	Fuel conservation mechanisms to be implemented.	<ul style="list-style-type: none"> Record and monitor fuel consumption regularly Reduce theft of fuel (increase security) 	Ongoing	Authorisation holder
Raw Material Consumption	General operational activities	Raw materials conservation mechanisms to be implemented.	<ul style="list-style-type: none"> Promote effective use of raw materials. 	Ongoing	Authorisation holder

Potential Impact	Project Activities	Management Objective	Proposed Mitigation Measures/Management Actions	Frequency	Institutional Responsibility
EFFECTS ON BIODIVERSITY					
Loss of existing habitat due to loss of vegetation due to fire	General operational activities	Minimal loss of vegetation to fire	<ul style="list-style-type: none"> Fire extinguishers must be placed on the property. 	Ongoing	Authorisation holder
Direct mortality of fauna	General operational activities	Minimal disturbance of fauna	<ul style="list-style-type: none"> 'It is not expected that any fauna will be found on site during operation. Management must include the requirement that should any be found that the relevant organisation be called to safely remove the species. 	Ongoing	Authorisation holder
Disruption of ecological life cycles due to the restriction of species movement	General operational activities	Minimal disturbance of ecological life cycles	<ul style="list-style-type: none"> 'Stormwater and road infrastructure should be designed in such a way that it will have minimal impact on the environmental. Maintenance should be undertaken as per the requirements of the stormwater management plan. 	Ongoing	Authorisation holder
INCIDENTS, ACCIDENTS, AND POTENTIAL EMERGENCY SITUATIONS					
Pollution incidents	General operational activities	Proper management of pollution sources to prevent pollution incidents on site.	<ul style="list-style-type: none"> Proper maintenance and management of sewer infrastructure to ensure no pollution incidents or spillages. 	Ongoing	Authorisation holder
Health and safety	General operational activities	Minimise potential impacts/incidents	<ul style="list-style-type: none"> 24-hour security and access control. 	Ongoing	Authorisation holder
Storage of oil/hydrocarbons	General operational activities	Minimize potential incidents and pollution related to the storage of oil/hydrocarbons	<ul style="list-style-type: none"> Proper storage of hydrocarbons/oils <ul style="list-style-type: none"> Storage requirements to be determined based on chemical qualities of material and Material Safety Data Sheets (MSDS). At a minimum, hazardous chemical substances (HCS) must be stored at a designated area that meets the following requirements: <ul style="list-style-type: none"> Earthed Fire extinguisher must be present Relevant signage to be displayed including No Smoking/ No open flames; Hazardous Chemical 	Ongoing	Authorisation holder

Potential Impact	Project Activities	Management Objective	Proposed Mitigation Measures/Management Actions	Frequency	Institutional Responsibility
			<p>Substance Store; Type of HCS (e.g. Diesel); Maximum contents volume and Fire extinguisher</p> <ul style="list-style-type: none"> Hazardous substances must be stored and handled in accordance with the appropriate legislation and standards, which include the Hazardous Substances Act (Act No. 15 of 1973), the Occupational Health and Safety Act (No. 85 of 1993), relevant associated Regulations, and applicable SANS and international standards. Any hazardous materials (apart from fuel) must be stored within a lockable store with a sealed floor. Suitable ventilation to be provided. All storage tanks containing hazardous materials must be placed in bunded containment areas with impermeable surfaces. The bunded area must be able to contain 110% of the total volume of the stored hazardous material. Spillages <ul style="list-style-type: none"> In the event of spillages of hazardous substances, the appropriate clean up and disposal measures are to be implemented. The contractor must ensure that necessary materials and equipment are available on site to deal with spills of any hazardous materials present The Project Manager must be notified of all significant spillages. 		
Fire	General operational activities	Measures in place to prevent fires.	<ul style="list-style-type: none"> Appropriate emergency response to be in place for dealing with fire at the construction site. All fire control mechanisms (firefighting equipment) will be routinely inspected by a qualified investigator for efficacy thereof and be approved by local fire services. All staff on site will be made aware of general fire prevention and control methods, and the name of the responsible person to alert to the presence of a fire. Burning of waste is not permitted. Suitable precautions will be taken (e.g. suitable fire extinguishers, water bowsers, welding curtains) when working with welding or grinding equipment. Designated smoking areas should be provided, with special bins for discarding of cigarette butts 	Ongoing	Authorisation holder

Potential Impact	Project Activities	Management Objective	Proposed Mitigation Measures/Management Actions	Frequency	Institutional Responsibility
SOCIAL					
Safety and security	General operational activities	Minimal safety and security issues.	<ul style="list-style-type: none"> 24-hour access control to the site and 24-hour security. 	Ongoing	Authorisation holder
Traffic Disruptions	General operational activities	Minimal traffic disturbances related to the operation of the dealership.	<ul style="list-style-type: none"> Road access and upgrades to intersection 1 as discussed in the Traffic Impact Assessment to be implemented. 	Ongoing	Authorisation holder
Decline/increase in economy	Supplier selection	Preferential use of local contractors and suppliers.	<ul style="list-style-type: none"> Local contractors and suppliers to be used during the construction phase as far as possible. 	Ongoing	Authorisation holder
Employment	Employment of permanent staff	Proper management of labour force is undertaken to ensure that there is optimal use of local labourers and local contractors.	<ul style="list-style-type: none"> Wherever possible labour, materials and services must be sourced locally. 	Ongoing	Authorisation holder

13 APPENDICES

13.1 Proposed Rescue And Relocation Plan For The Red Data Listed Plant Species, *Hypoxis Hemerocallidea* Found On The Proposed Development Site

13.1.1 General information

Hypoxis hemerocallidea falls within the botanical family Hypoxidaceae. The members of this family are fairly small to medium-sized herbaceous plants, with grass-like leaves and an invisible stem which is modified into a corm or rhizome (a rounded underground storage organ resembling a bulb). The flowers are borne on leafless shoots known as scrapes and are trimerous (arranged in whorls of three) and radically symmetric. The plant is easily recognizable by its yellow star-shaped flowers and strap-like leaves. *Hypoxis hemerocallidea* favours grassland, preferring full sunlight, although it is known to occur in other habitat types. The leaves of *Hypoxis hemerocallidea* are distinctly three-ranked and arching and are densely covered with hairs.

Hypoxis hemerocallidea is one of the most commonly used species in the traditional medicinal plant trade and is currently also used in primary health care as an immune booster for patients with HIV/AIDS. The rootstock is used in the treatment of urinary infections, heart weakness, internal tumours and nervous disorders. The plant is also currently used to alleviate many immune related ailments, such as colds, flu, arthritis tumours and cancers (www.plantzafrica.com).

As *Hypoxis hemerocallidea* is a relatively hardy bulbous plant, with a shallow root structure, it is suitable for relocation to areas of similar habitat. A “rescue and relocation” plan is therefore proposed for these individuals. This is perceived to be a viable mitigation measure for ensuring the ongoing survival of this species in the area, as an area is already designated for conservation on the site.

The “rescue and relocation” plan must be undertaken prior to the onset of the construction phase of the development and must be completed by an appropriate service provider.

13.1.2 Proposed “Rescue and Relocation” Plan

13.1.2.1 Step 1:

An appropriate service provider must be appointed to conduct and manage the operation.

13.1.2.2 Step 2:

Each individual plant located outside the areas of medium ecological sensitivity needs to be located, correctly identified (*Hypoxis hemerocallidea* is sometimes confused with other species of *Hypoxis*, such as *Hypoxis iridifolia*) and marked, using a brightly coloured marker to ensure visual location later.

13.1.2.3 Step 3:

To safely remove each individual plant, minimal damage to the corm must be ensured. The hole must be dug approximately 30 cm from the base of the plant and at least 30 cm deep to ensure minimal damage. Removal of the plant from its site should be done with care, pushing the plant up from the corm/rootstock. The plant should not be pulled from the soil using the leaves.

13.1.2.4 Step 4:

Once removed, the plants must be placed in appropriately sized propagating bags (dependent on each individual plant), utilising soil directly from the site. Should the soil prove to be of poor quality, organic fertilizer or compost must be added to the soil. These plants must be cared for until completion of the construction phase of the development. As these plants can tolerate moderate bouts of water stress, caution must be taken not to over-water or drown the individuals. Over-watering would also cause leeching of the soil, reducing nutrients available to the plants.

13.1.2.5 Step 5:

Once the construction phase is complete, the plants must be relocated on the property. Plants can either be transferred to the existing *Hypoxis hemerocallidea* community or may be incorporated into the cultivated gardens of the development. Should plants be transferred to the existing community, caution must be taken not to damage other species of plant in the area. Holes must be dug prior to transfer of plants and must be large enough to ensure plants do not become dislodged during heavy rainfall.