

Appendix D

ENVIRONMENTAL MANAGEMENT PROGRAMME

WORKING FOR WETLANDS PROGRAMME



CONSTRUCTION ENVIRONMENTAL MANAGEMENT PROGRAMME

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ACRONYMS

| | |
|--------------|---|
| BAR | Basic Assessment Report |
| DAFF | Department of Agriculture, Forestry and Fisheries |
| DEA | Department of Environmental Affairs |
| DWS | Department of Water and Sanitation |
| EAP | Environmental Assessment Practitioner |
| ECO | Environmental Control Officer |
| EMPr | Construction Environmental Management Programme |
| EPWP | Expanded Public Works Programme |
| GPS | Global Positioning System |
| IE | Implementing Entity |
| NEMA | National Environmental Management Act (Act 107 of 1998) |
| NRM | Natural Resource Management |
| PC | Provincial Coordinator ¹ |
| PDP | Professional Driving Permit |
| PIP | Project Implementation Plan |
| PPE | Personal Protective Equipment |
| PPR | Project Progress Report |
| SABS | South African Bureau of Standards |
| SAHRA | South African Heritage Resources Agency |
| SEP | Site Environmental File |
| SETA | Sector Education and Training Authority |

¹ Also referred to as Assistant Director: Wetlands Programme.



DEFINITIONS

Alien species²:

- (a) a species that is not an indigenous species; or
- (b) an indigenous species translocated or intended to be translocated to a place outside its natural distribution range in nature, but not an indigenous species that has extended its natural distribution range by natural means of migration or dispersal without human intervention.

Approved: Means approved in terms of the applicable legal requirements (e.g. NEMA approval/ Environmental Authorisation) and/or has been approved by the WfWetlands Programme's Deputy Director: Planning, Monitoring and Evaluation and/or an authorised representative of the WfWetlands Programme.

Archaeological³:

- (a) material remains resulting from human activity which are in a state of disuse and are in or on land and which are older than 100 years, including artefacts, human and hominid remains and artificial features and structures;
- (b) rock art, being any form of painting, engraving or other graphic representation on a fixed rock surface or loose rock or stone, which was executed by human agency and which is older than 100 years, including any area within 10m of such representation;
- (c) wrecks, being any vessel or aircraft, or any part thereof, which was wrecked in South Africa, whether on land, in the internal waters, the territorial waters or in the maritime culture zone of the Republic, as defined respectively in sections 3, 4 and 6 of the Maritime Zones Act, 1994 (Act No. 15 of 1994), and any cargo, debris or artefacts found or associated therewith, which is older than 60 years or which the South African Heritage Resource Agency (SAHRA) considers to be worthy of conservation; and

Auditing⁴: A systematic, documented, periodic and objective evaluation which provides verifiable findings, in a structured and systematic manner, on:

- (a) the level of performance against and compliance of an organisation or project with the provisions of the requisite environmental authorisation or Environmental Management Programme (EMPr) and, where applicable, the closure plan; and
- (b) the ability of the measures contained in the EMPr, and where applicable the closure plan, to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity.

Authority: National, regional or local authority, that has a decision-making role or interest in the project.

Basic Assessment Report (BAR): A report as described in Regulation 19 of GN R982 (2014, as amended) of the National Environmental Management Act (No. 107 of 1998, as amended) (NEMA).

Best Management Practice (BMP): Procedures and guidelines to ensure the effective and appropriate implementation of wetland rehabilitation by WfWetlands implementers.

² National Environmental Management: Biodiversity Act (No. 10 of 2004)

³ National Heritage Resources Act (No. 25 of 1999)

⁴ Regulation 34 of GN R982 (2014, as amended) of NEMA



Cement laden water: Means water (fresh or wash water) which has been in contact with partially cured concrete/mortar or raw cement product and which contains suspended and dissolved cement solids.

Commence: The start of any physical activity, including site preparation and any other activity on site furtherance of a listed activity or specified activity, but does not include any activity required for the purposes of an investigation or feasibility study as long as such investigation or feasibility study does not constitute a listed activity or specified activity.

Contaminated water: Means water contaminated by the Implementing Entity's activities such as with hazardous substances, hydrocarbons, paints, solvents and runoff from plant, workshop or personnel wash areas but excludes water containing cement/ concrete or silt.

Corrective (or remedial) action: Reactive response required to address an environmental problem that is in conflict with the requirements of the EMPr. The need for corrective action may be determined through monitoring, audits or management review.

Dam⁵: Any barrier dam and any other form of impoundment used for the storage of water, excluding reservoirs.

Dangerous goods: Goods containing any of the substances as contemplated in South African National Standard No. 10234, supplement 2008 1.00: designated "*List of classification and labelling of chemicals in accordance with the Globally Harmonized Systems (GHS)*" published by Standards South Africa, and where the presence of such goods, regardless of quantity, in a blend or mixture, causes such blend or mixture to have one or more of the characteristics listed in the Hazard Statements in section 4.2.3, namely physical hazards, health hazards or environmental hazards.

Decommissioning⁶: To take out of active service permanently or dismantle partly or wholly, or closure of a facility to the extent that it cannot be readily re-commissioned.

Dust⁷: Any material composed of particles small enough to pass through a 1 mm screen and large enough to settle by virtue of their weight into the sampling container from the ambient air.

Eco-log: A cylindrical sleeve made from, for example wire mesh, filled with organic material and/or soil used to prevent and/or repair minor erosion.

Ecosystem services or 'eco services': The services such as sediment trapping or water supply, supplied by an ecosystem (in this case a wetland ecosystem).

Endangered species: Means any indigenous species listed as an endangered species in terms of section 56 of the National Environmental Management Biodiversity Act ((No. 10 of 2004).

Endemic: An "endemic" is a species that grows in a particular area (i.e. it is endemic to that region) and has a restricted distribution. It is only found in a particular place. Whether something is endemic or not depends on the geographical boundaries of the area in question and the area can be defined at different scales.

⁵ GN R983 (2014, as amended) of NEMA

⁶ GN R983 (2014, as amended) of NEMA

⁷ National Dust Regulations GN R827 (2013)



Environment⁸: Means the surroundings within which humans exist and that are made up of:

- i. the land, water and atmosphere of the earth;
- ii. micro-organisms, plant and animal life;
- iii. any part or combination of i) and ii) and the interrelationships among and between them; and
- iv. the physical, chemical, aesthetic and cultural properties and conditions of the foregoing that influence human health and well-being.

Environmental Assessment Practitioner (EAP): The individual responsible for the planning, management and coordination of the environmental impact assessments, strategic environmental assessments, environmental management plans and/or other appropriate environmental instruments introduced through regulations of NEMA.

Environmental Impact Assessment (EIA): A study of the environmental consequences of a proposed course of action via the process of collecting, organising, analysing, interpreting and communicating information that is relevant to the consideration of that application.

Environmental impact: An environmental change caused by some human act.

Environmental impact: Change in an environment resulting from the effect of an activity on the environment, whether positive or negative. Impacts may be the direct consequence of an individual's or organisation's activities or may be indirectly caused by them (DEAT, 1998).

Erosion: The loss of soil through the action of water, wind, ice or other agents, including the subsidence of soil.

Establishment of grass: Refers to all necessary procedures taken to produce an acceptable cover of specified live grass over an area.

Gabion: A structure made of wire mesh baskets filled with regularly sized stones, and used to prevent and/or repair erosion. They are flexible and permeable structures which allow water to filter through them. Vegetation and other biota can also establish in/around the habitat they create.

Hazard: Means a source of or exposure to danger.

Invasive alien species control:

- (a) to combat or eradicate an alien or invasive species; or
- (b) where such eradication is not possible, to prevent, as far as may be practicable, the recurrence, re-establishment, re-growth, multiplication, propagation, regeneration or spreading of an alien or invasive species.

Implementing Entity: The entity responsible for the construction of WfWetlands rehabilitation interventions by means of various contracted teams.

Indigenous vegetation⁹: Refers to vegetation consisting of indigenous plant species occurring naturally in an area, regardless of the level of alien infestation and where the topsoil has not been lawfully disturbed during the preceding ten years.

⁸ NEMA

⁹ GN R983 (2014, as amended) of NEMA



Interested and Affected Parties (I&APs)¹⁰:

(a) all persons who, as a consequence of the public participation process conducted in respect of that application, have submitted written comments or attended meetings with the proponent, applicant or EAP;

(b) all persons who have requested the proponent or applicant, in writing, for their names to be placed on the register; c) all organs of state which have jurisdiction in respect of the activity to which the application relates.

Intervention: An engineered structure such as a concrete or gabion weir, earthworks or revegetation that achieves identified objectives within a wetland e.g. raising of the water table within a drainage canal.

Invasive species¹¹: Means any species whose establishment and spread outside of its natural distribution range-

(a) threaten ecosystems, habitats or other species or have demonstrable potential to threaten ecosystems, habitats or other species; and

(b) may result in economic or environmental harm or harm to human health.

Listed invasive species: Any invasive species listed in terms of sections 66(1), 67(1), 70(1)(a), 71(3) and 71A of the National Environmental: Biodiversity Act (No. 10 of 2004).¹²

Maintenance period: The period after the Establishment Period (Practical Completion), up to and until the end of the Maintenance Period (i.e. a period of 12 months).

Maintenance¹³: Means actions performed to keep a structure or system functioning or in service on the same location, capacity and footprint.

Mine:

(a) used as a noun-

any excavation in the earth, including any portion under the sea or under other water or in any residue deposit, as well as any borehole, whether being worked or not, made for the purpose of searching for or winning a mineral;

any other place where a mineral resource is being extracted, including the mining area and all buildings, structures, machinery, residue stockpiles, access roads or objects situated on such area and which are used or intended to be used in connection with such searching, winning or extraction or processing of such mineral resource; and

(b) used as a verb-

in the mining of any mineral, in or under the earth, water or any residue deposit, whether by underground or open working or otherwise and includes any operation or activity incidental thereto, in, on or under the relevant mining area.

Mitigation: Actions to reduce the impact of a particular activity.

¹⁰ Regulation 42 GN R983 (2014, as amended) of NEMA

¹¹ National Environmental Management: Biodiversity Act (No. 10 of 2004)

¹² Also refer to GN 864 (2016): Alien and Invasive Species Lists

¹³ GN R983 (2014, as amended) of NEMA



Mitigation¹⁴: Means to anticipate and prevent negative impacts and risks, then to minimise them, rehabilitate or repair impacts to the extent feasible;

Monitoring¹⁵: The repetitive and continued observation, measurement and evaluation of environmental criteria to follow changes over a period of time and to assess the efficiency of control measures.

Nursery conditions: This refers to the necessary conditions that must be in place for maintaining strong healthy growth in all container plant materials on site. This includes for the protection of all container plants against wind, frost, direct sunlight, pests, disease and drought. It also includes for the provision of adequate and suitable water supply, fertilisers and all other measures necessary to maintain strong and healthy plant growth.

Offensive odour: Any smell which is considered to be malodorous or a nuisance to a reasonable person.

Pollution¹⁶: Means any change in the environment caused by substances;

(ii) radioactive or other waves; or

(iii) noise, odours, dust or heat,

emitted from any activity, including the storage or treatment of waste or substances, construction and the provision of services, whether engaged in by any person or an organ of state, where that change has an adverse effect on human health or wellbeing or on the composition, resilience and productivity of natural or managed ecosystems, or on materials useful to people, or will have such an effect in the future.

Post-construction: Refers to the period of 12 months after the completion of the construction works, the onset coinciding with the maintenance period.

Potentially hazardous substance: Any substance or mixture of substances, product or material declared to be a hazardous substance under section 2(1) of the Hazardous Substance Act (1973).

Pre-construction: Refers to the period leading up to the establishment on site by the Implementing Entity.

Project: A defined area for which an approved rehabilitation plan exists for the WfWetlands Programme.

Public Participation Process (PPP): A process of involving the public in order to identify issues and concerns, and obtain feedback on options and impacts associated with a proposed project, programme or development. Public Participation Process in terms of NEMA refers to a process in which potential interested and affected parties are given an opportunity to comment on, or raise issues relevant to specific project matters.

Quaternary Catchment: A fourth order catchment in a hierarchal classification system in which a primary catchment is the major unit and that is also the "principal water management unit in South Africa"¹⁷

¹⁴ GN R983 (2014, as amended) of NEMA

¹⁵ DEAT, 1998

¹⁶ National Environmental Management Act (No. 107 of 1998, as amended)

¹⁷ DWS Groundwater Dictionary. Available online:

http://www.dwaf.gov.za/Groundwater/Groundwater_Dictionary/index.html?introduction_quaternary_catchment.htm



Reasonable: Means, unless the context indicates otherwise, reasonable in the opinion of the relevant environmental authority.

Rehabilitation: Refers to re-instating the driving ecological forces (including hydrological, geomorphological and biological processes) that underlie a wetland, so as to improve the wetland's health and the ecological services that it delivers; and

Restoring processes and characteristics that are sympathetic to and not conflicting with the natural dynamic of an ecological or physical system¹⁸.

Scarifying: Loosening the soil in areas which have become hard and compacted and which need to be loosened in order to facilitate revegetation.

Shaping: Finishing all slopes which do not form part of the permanent works so that they do not exceed the maximum gradient stipulated in the approved rehabilitation plan.

Significant impact: Means an impact that may have a notable effect on one or more aspects of the environment or may result in k with accepted environmental quality standards, thresholds or targets and is determined through rating the positive and negative effects of an impact on the environment based on criteria such as duration, magnitude, intensity and probability of occurrence.

Silt laden water: Means water (mostly overland surface runoff) containing a substantial concentration of suspended solids with increased turbidity. Usually occurs as a result of exposed/cleared ground surfaces, concentration of runoff and/or erosion of excavated or imported materials.

Site: This is the area described in the approved/authorised rehabilitation plan for the implementation of the rehabilitation measures. Where the area is not demarcated, it will include all adjacent areas, which are reasonably required for the activities for the Implementing Entity, and approved for such use by the Environmental Control Officer (ECO).

Slope: The inclination of a surface expressed as 1 unit of rise or fall for so many horizontal units.

Subsoil: The soil horizons between the topsoil horizon and the underlying parent rock.

Topsoil: The upper soil profile irrespective of the fertility appearance, structure, agriculture potential, fertility and composition of the soil, usually containing organic material and which is colour specific. Also referred to as the "O" and "A" horizons.

Waste: Any substance, material or object, that is unwanted, rejected, abandoned, discarded or disposed of, or that is intended or required to be discarded or disposed of, by the holder of that substance, material or object, whether or not such substance, material or object can be re-used, recycled or recovered and includes all wastes as defined in Schedule 3 the National Environmental Management: Waste Act (No. 59 of 2008)¹⁹. Examples include construction debris, chemical waste, used oils and lubricants, batteries, metal and wood off-cuts, excess cement/ concrete, wrapping materials, timber, tins and cans, drums, wire, nails, food and domestic waste (e.g. plastic packets and wrappers).

Watercourse:

- (a) a river or spring;
- (b) a natural channel in which water flows regularly or intermitted;
- (c) a wetland, pan, lake or dam into which, or from which, water flows

¹⁸ Wetland Management Series: WET-Origins, WRC Report TT 334/08, March 2008

¹⁹ National Environmental Management: Waste Act (No. 59 of 2008, as amended)



A reference to a watercourse includes, where relevant, its bed and banks

Weir: A dam-type structure placed across a watercourse to raise the water table of the surrounding ground and trap sediment on the upstream face without preventing water flow. Weirs are generally used to prevent erosion from progressing up exposed gullies.

Wetland: Land which is transitional between terrestrial and aquatic systems where the water table is usually at or near the surface, or the land is periodically covered with shallow water and which in normal circumstances supports or would support vegetation typically adapted to life in saturated soils²⁰ and,

Land where an excess of water is the dominant factor determining the nature of the soil development and the types of plants living there²¹.

²⁰ National Water Act (No. 36 of 1998, as amended)

²¹ Wetland Management Series: WET-Origins, WRC Report TT 334/08, March 2008



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1 INTRODUCTION

1.1 Project Overview

Working for Wetlands is a government programme managed by the Natural Resource Management (NRM) Programme of the Department of Environmental Affairs (DEA), and is a joint initiative with the Departments of Water and Sanitation (DWS), and Agriculture and Forestry and Fisheries (DAFF). In this way the programme is an expression of the overlapping wetland-related mandates of the three parent departments, and besides giving effect to a range of policy objectives, it also honours South Africa's commitments under several international agreements, especially the Ramsar Convention on Wetlands.

The programme is mandated to protect pristine wetlands, promote their wise-use and rehabilitate those that are damaged throughout South Africa, with an emphasis on complying with the principles of the Expanded Public Works Programme (EPWP) and using only local Small, Medium and Micro Enterprises (SMMEs). The EPWP seeks to draw significant numbers of unemployed people into the productive sector of the economy, gaining skills while they work and increasing their capacity to earn an income.

1.2 Purpose of the EMPr

An Environmental Management Programme (EMPr) is compiled as part of the requisite submissions contained in a Basic Assessment Report (BAR) or Environmental Impact Report (EIR) in order to obtain an Environmental Authorisation (EA) to proceed with a listed activity(ies) as defined in GN R982 (2014, as amended) of the National Environmental Management Act (No. 107 of 1998), as amended. Upon approval of the BAR or EIR and resultant issuing of the EA, the EMPr becomes a legally binding document of which compliance has to be audited by an independent and appropriately qualified auditor as per Regulation 34 of GN R982 (2014, as amended).

The EMPr's main purpose is to document general and specific avoidance, mitigation and termination actions in order to address general and project specific impacts as identified by means of the EIA and/or Phase 2 planning process. Implementation of the actions specified in the EMPr can be contractually delegated to various parties involved in the project execution. However, legal compliance with the EA and EMPr remains with the EA holder and cannot be delegated or transferred. It is therefore of utmost importance that WfWetlands ensures that all parties involved are familiar with the contents and requirements of the EMPr as non-conformances can ultimately have legal and financial consequences to primarily the EA holder but also subsequently all other parties involved.

1.3 Auditing of compliance with the EA and EMPr

Compliance auditing has been transformed from a vague requirement under the 2006 and 2010 EIA regulations to a very specific set of actions and outcomes which are to be achieved under the 2014 EIA regulations. An audit report is now also subject to a specified structure and with specific content requirements (Appendix 7 of GN R982), as amended. According to GN R982 Appendix 7 (Section 2) the objectives of an audit report include *inter alia* the following:

- a) to report on—
 - i. the level of compliance with the conditions of the environmental authorisation and the EMPr, and where applicable, the closure plan; and
 - ii. the extent to which the avoidance, management and mitigation measures provided for in the EMPr, and where applicable, the closure plan achieve the objectives and outcomes of the EMPr, and closure plan;



- b) identify and assess any new impacts and risks as a result of undertaking the activity;
- c) evaluate the effectiveness of the EMPr, and where applicable, the closure plan;
- d) identify shortcomings in the EMPr, and where applicable, the closure plan; and
- e) identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr, and where applicable, the closure plan.

As per Regulation 34, sub-regulation 4 of GN R982, where the findings of the environmental audit report contemplated in sub- regulation (1) of GN R982 indicate:

- (a) insufficient mitigation of environmental impacts associated with the undertaking of the activity; or
- (b) insufficient levels of compliance with the environmental authorisation or EMPr and, where applicable the closure plan;

the holder must, when submitting the environmental audit report to the competent authority in terms of sub-regulation (1), submit recommendations to amend the EMPr or closure plan in order to rectify the shortcomings identified in the environmental audit report.

When submitting recommendations in terms of sub-regulation (4), such recommendations must have been subjected to a public participation process, which process has been agreed to by the competent authority and was appropriate to bring the proposed amendment of the EMPr and, where applicable the closure plan, to the attention of potential and registered interested and affected parties, including organs of state which have jurisdiction in respect of any aspect of the relevant activity and the competent authority, for approval by the competent authority.

Given the strict and onerous above-mentioned requirements in terms of compliance with the EA and EMPr as well as auditing thereof, it is therefore of utmost importance that the EMPr specifies realistic and auditable avoidance, mitigation and cessation actions which can be applied across a wide range of project in various geographical settings. The approach to the structure and content of this EMPr is discussed in more detail under Section 1.7 below.

1.4 Frequency of compliance auditing

The ECO and Implementing Entity is responsible for ensuring compliance with the EMPr. The ECO shall inspect the site prior to commencement of any construction activity, at least once per month during construction and on completion of construction to establish the level of compliance with this CEMP. At sensitive sites, bi-weekly inspections shall take place as a minimum.

Monthly site audits shall be undertaken by the ECO and a bimonthly Project Inspection Report submitted to the Working for Wetlands Deputy Director: Planning, Monitoring and Evaluation for review prior to the annual Compliance Audit taking place.

The annual Compliance Audit Report shall be submitted to the DEA collating the year's completed checklists. It is the responsibility of the ECO to report any non-compliance, which is not correctly rectified to the DEA.

1.5 Content of an EMPr

Environmental management programmes are intended to be documents which indicate how the mitigation and management measures proposed for a project can be implemented in practice. As such they should be practical, reasonable and feasible. They must also meet the requirements of the legislation (Table 1), in particular regulation 19 (4) of the 2014 EIA regulations (GN R982).



Table 1: Requirements of an EMPr as per Appendix 4 of the 2014 EIA regulations, GN R982 (2014, as amended)

| Section | Description | Heading/ section in this EMPr |
|---------|--|---------------------------------------|
| (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; | Report control sheet Annexure E |
| (b) | a detailed description of the aspects of the activity that are covered by the EMPr as identified by the project description; | Sections 1.1, 1.2 and 1.7 |
| (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; | Chapter 6 Annexure C |
| (d) | a description of the impact management outcomes, including management statements, identifying the impacts and risks that need to be avoided, managed and mitigated as identified through the environmental impact assessment process for all phases of the development including- (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; | Chapters 3-5 |
| (f) | a description of proposed impact management actions, identifying the manner in which the impact management outcomes contemplated in paragraphs (d) will be achieved, and must, where applicable, including actions to - (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; | Chapters 4-5 |
| (g) | the method of monitoring the implementation of the impact management actions contemplated in paragraph (f); | Chapters 4-5 |
| (h) | the frequency of monitoring the implementation of the impact management actions contemplated in paragraph (f); | Chapters 4-5 |
| (i) | an indication of the persons who will be responsible for the implementation of the impact management actions; | Section 2.1; Chapters 4-5 |
| (j) | the time periods within which the impact management actions contemplated in paragraph (f) must be implemented; | Section 2.1 |



| Section | Description | Heading/ section in this EMPr |
|---------|---|-------------------------------------|
| (k) | the mechanism for monitoring compliance with the impact management actions contemplated in paragraph (f); | Chapters 4-5 |
| (l) | a program for reporting on compliance, taking into account the requirements as prescribed by the Regulations; | Sections 1.3 and 1.4 |
| (m) | an environmental awareness plan describing the manner in which- (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 | Section 3.3 and Chapter 6 |
| (n) | any specific information that may be required by the competent authority. | NA |

1.6 Relevant legislation, guidelines and other documents

This EMPr should be read in the context of the following documents:

- Constitution of the Republic of South Africa Act (No. 108 of 1996)
- National Environmental Management Act, (No. 107 of 1998, as amended)
- National Environmental Management: Waste Act (No. 59 of 2008)
- National Forest Act (No. 84 of 1998)
- National Water Act (No. 36 of 1998)
- National Heritage Resources Act (No. 25 of 1999)
- Municipal Systems Act (No. 32 of 2000)
- Occupational Health and Safety Act (No. 85 of 1993)

Note that the EMPr is not intended to replace any of the above, but rather augment them. Compliance with the EMPr does not exempt the EA holder, i.e. WfWetlands, from compliance with the legal or management requirements of any other licence or permit issued in terms of the project.

1.7 The EMPr in the context of the WfWetlands programme

As discussed under the previous sections, an EMPr and compliance with the EMPr (including compliance auditing) is specifically and strictly regulated under the 2014 EIA regulations, as amended. The implementation of a standard EMPr across a programme as diverse as WfWetlands does however pose various challenges as a result of the wide variety of interventions, site conditions, types of wetland systems, ecological integrity and complexity and so forth.

As a result the EMPr has been written with the abovementioned challenges in mind. It therefore focuses on the typical activities and impacts related to a WfWetlands project and generic avoidance, mitigation and termination actions. The EMPr is augmented by a site specific Rehabilitation Plan which includes more site specific mitigation measures and requirements where required. It is recommended that



compliance auditing takes into account the specific mitigation measures recommended in the accompanying Rehabilitation Plan for each individual project as well.

- Allowance will also be made throughout the document for minor deviations to allow for site specific scenarios but with the condition that each deviation be approved by the provincial Programme's Provincial Coordinator (PC) and in the case of major deviations by the DEA (also see Annexure B).



2 IMPLEMENTATION OF THE EMPr

The EMPr is ultimately intended to aid in the implementation of specific actions on site in order to ensure that the impacts of a project are avoided or mitigated during the various project implementation phases. A number of role-players are required to actively participate in the implementation of the EMPr with different roles and responsibilities typically assigned to each. The various roles and responsibilities are outlined below.

2.1 Role-players and their functions/responsibilities

2.1.1 DEA

| Responsible Entity: DEA | |
|--|------------------|
| <ul style="list-style-type: none"> DEA (specifically the Legal Authorisations and Compliance Inspectorate) holds the ultimate authority and mandate in terms of ensuring environmental legislation is adhered to. | |
| Responsibilities | Duration |
| <ul style="list-style-type: none"> Investigate reported non-compliances with EAs and EMPrs either as a result of findings by an ECO/auditor, reporting by the EA holder or public complaints. Enforce compliance and adherence to the EA, EMPr or any other environmental legislation through a number of administrative and legal procedures should it prove that a person or organisation is in contravention of an EA, EMPr or other environmental authorisation. | Project lifespan |

2.1.2 The EA holder

| Responsible Entity: WfWetlands | |
|---|-------------------------------|
| <ul style="list-style-type: none"> Holds sole legal liability in terms of ensuring compliance to the EA and EMPr. Some responsibilities resulting from the EA or EMPr can be delegated or transferred contractually. | |
| Responsibilities | Duration |
| Contractual <ul style="list-style-type: none"> Ensure that the EA and EMPr is included in the contract documentation for a project in order to ensure that compliance with the EA and EMPr is contractually binding. Ensure that current standards and specifications forming part of the standard contract documentation allow for or are aligned to the requirements of the EA and EMPr. Ensure that all PCs and Implementing Entities are familiar with the requirements of the EA and EMPr. | Appointment; Project lifespan |



| Responsibilities | | Duration |
|-------------------------------|--|---------------------------------------|
| Approvals and licences | <ul style="list-style-type: none"> Identify, obtain and comply with all other necessary approvals, permits, authorisations and requirements set by the relevant National and Provincial Departments and Local Authority for the construction of engineering interventions for the rehabilitation of wetlands before any site preparation activities are undertaken. | Pre-construction |
| Record keeping | <ul style="list-style-type: none"> Ensure that a proper record keeping system is in place to keep track of proof that copies of the EA and EMPr were issued to the PCs and Implementing Entities. | Pre-construction; Project lifespan |

2.1.3 The PC

| Responsible Entity: PC | | |
|---|---|---------------------------------------|
| <ul style="list-style-type: none"> The PC shall be responsible for his/her specific province to ensure compliance with the EMPr. | | |
| Responsibilities | | Duration |
| Approvals and licences | <ul style="list-style-type: none"> Be fully aware of and understand all the requirements of the EA(s) and EMPr(s) issued for projects in his/her province. Ensure compliance with the EA and implementation of the EMPr. Ensure that each Implementing Entity receives a copy of the EA and EMPr for distribution to each contractor, with proof of receipt (e.g. a transmittal note or similar). Ensure that each Implementing Entity fully understands the contents and requirements of the EA and EMPr and the legal and financial consequences of non-compliance. | Pre-construction; Project lifespan |
| Communication | <ul style="list-style-type: none"> Communicate environmental issues associated with the site to the Implementing Entity, including having adequate environmental knowledge in the field of wetland rehabilitation to understand the detailed environmental issues associated with the project. | Pre-construction; Project lifespan |
| Site management | <ul style="list-style-type: none"> Assist with developing a site environmental file and ensuring all documentation is filed correctly. Assist with site or project specific challenges or problems which might result in a non-conformance with the EA and EMPr. Provide guidance to Implementing Entities on practical solutions in achieving the outcomes and requirements of the EA and EMPr. | Pre-construction; Project lifespan |



| Responsibilities | | Duration |
|-------------------------------|--|------------------|
| Environmental training | <ul style="list-style-type: none"> Confirm that Environmental Awareness training has been undertaken on all sites prior to construction commencing. | Pre-construction |

2.1.4 The ECO

| Responsible Entity: ECO | | |
|--|---|------------------------------------|
| Responsibilities | | Duration |
| <ul style="list-style-type: none"> The PC shall perform the duties of the ECO via monthly inspections in order to minimise adverse environmental impacts and effects. Any changes to any environmental management documentation must be reviewed and understood by the ECO. The ECO has access to the construction site at all times. Remain appointed until the site has been rehabilitated as specified in the EMPr. | | |
| Responsibilities | | Duration |
| Approvals and licences | <ul style="list-style-type: none"> Ensure compliance with the EA, EMPr, permits issued and all the environmental legislation. Be fully knowledgeable with the contents and the conditions of the EA and all amendments. Be fully knowledgeable with the contents of the latest revision of the EMPr. Be fully knowledgeable with the contents of all relevant environmental legislation, and ensure compliance with them. | Pre-construction |
| Communication | <ul style="list-style-type: none"> Ensure that the contents of the EMPr are communicated to the Implementing Entity. Escalate serious or repeat non-conformances to the relevant competent authority (i.e. DEA, DWS, SAHRA, etc.). | Pre-construction; Project lifespan |
| Site management | <ul style="list-style-type: none"> Approve the site layout plan (showing environmental sensitive/no-go areas). Ensure that all relevant activities being undertaken on site are within the scope of the EA and within the boundaries of the approved layout plan. | Project lifespan |
| Environmental training | <ul style="list-style-type: none"> Confirm that Environmental Awareness training has been undertaken on all sites prior to construction commencing. | Pre-construction |
| Method statements | <ul style="list-style-type: none"> Ensure that all method statements required are submitted and approved prior to site establishment. | Pre-construction |

| Responsibilities | | Duration |
|-----------------------|--|--------------------------------------|
| Record keeping | <ul style="list-style-type: none"> • Keep and maintain a schedule of current site activities including the monitoring of such activities. • Keep copies of all reports submitted to DEA. • Obtain and keep record of all documentation including: environmental authorisation from DEA, EMPr, basic assessment, site layout plan, method statements, all communication detailing changes that may have environmental implications, site inspection checklist, Environmental awareness training attendance register, Environmental incident report, environmental performance certificates (once a project has been completed) photographic records (before, during and after development), records of non-compliance and corrective action taken to remediate, permits, licenses, and authorisations such as waste disposal certificates, hazardous waste landfill site licenses etc. which are required by this facility. | Project lifespan |
| Audits | <ul style="list-style-type: none"> • Compile an audit checklist which complies with the requirements of GN R982 Appendix 7 and is able to measure compliance against the EA, EMPr, other relevant permits and contract environmental specifications (where applicable). • Escalate serious or repeat non-conformances to the relevant competent authority (i.e. DEA, DWS, SAHRA, etc.). • Work with the Implementing Entity and relevant stakeholders to resolve any areas of non-compliance with appropriate corrective action. • Assist the Implementing Entity in finding environmentally responsible solutions to problems. • Giving a report back on the environmental issues at the monthly site meetings and other meetings that may be called regarding environmental matters. • Submit final audit report to DEA upon project closure in accordance with the requirements of the EA and EMPr. | Project lifespan; Project closure |

2.1.5 The Implementing Entity

Responsible Entity: Implementing Entity

- The Implementing Entity will be acting as the Project Manager and is responsible for complying with the EMPr during the construction phase of the development on a day-to-day basis.
- The Implementing Entity will be responsible for any non-compliance with the EMPr and will pay for any remedial work that may result from non-compliance resulting directly from his/her negligence. Failure to comply with the EMPr is addressed in Section 2.2.3.



| Responsibilities | | Duration |
|-------------------------------|---|------------------------------------|
| Approvals and licences | <ul style="list-style-type: none"> Ensure that a copy of the EMPr, EA and any other applicable permit/licence are available on site. | Pre-construction; Project lifespan |
| Communication | <ul style="list-style-type: none"> Submit all required documentation (e.g. proof of training, method statements, layout plans, and requests for deviations) to the ECO on a timely basis. Communicate any issues or concerns of the surrounding community regarding the development to the ECO or other responsible party and visa-versa. Ensure that all materials and equipment required for daily environmental compliance is ordered through the correct channels if such is not available. | Pre-construction; Project lifespan |
| Site management | <ul style="list-style-type: none"> Ensure that appointed contractors, participants and sub-contractors are familiar with the EMPr and that they abide by it. Monitor and verify on a daily basis that the EMPr and specifications (if applicable) is adhered to at all times and taking the necessary action to ensure compliance is achieved where it is lacking. Ensure that site demarcation and no-go areas are maintained. Monitor and verify that environmental impacts as a result of construction activities are kept to a minimum. Ensure that all materials and equipment required for daily environmental compliance are available on site and ensure that the aforementioned is ordered through the correct channels if such is not available. Inspect the site and surrounding areas regularly with regard to compliance with the EMPr. Keep a photographic record of progress on site from an environmental perspective. | Project lifespan |
| Environmental training | <ul style="list-style-type: none"> Provide environmental awareness training for all new personnel coming onto site and filing proof of such training in the Environmental File on site. | Pre-construction |
| Method Statements | <ul style="list-style-type: none"> Ensure compliance with approved Method Statements. | Pre-construction; Project lifespan |

| Responsibilities | | Duration |
|-----------------------|---|------------------|
| Record keeping | <ul style="list-style-type: none"> • Submit all required documentation (e.g. proof of training, method statements, layout plans, and requests for deviations) to the ECO on a timely basis. • File proof of environmental awareness training in the Environmental File kept on site. • Keep and maintain a detailed incident (including spillage of fuels, chemicals, or any other material) and complaints register on site indicating how these issues were addressed, what rehabilitation measures were taken and what preventative measures were implemented to avoid re-occurrence of incidents/complaints. • Ensure that all relevant documentation illustrating or proving environmental compliance are filed on site in the Environmental File for inspection by the ECO or Competent Authority. • Keep a photographic record of progress on site from an environmental perspective. | Project lifespan |
| Audits | <ul style="list-style-type: none"> • Complete start-up and site closure checklists on a weekly or monthly basis or as otherwise specified. | Project lifespan |

2.2 Record keeping (site related activities)

The development of an EMP for a project is an important and necessary task that is aimed at assigning responsibilities and mitigation options to a variety of activities. However, it can be an ineffective tool in the absence of auditing or monitoring activities. Auditing or monitoring activities involve the structured observation, measurement, and evaluation of environmental data over a period of time.

2.2.1 Site Environmental File

The Site Environmental File (SEF) is a critical part of compliance record keeping, specifically in terms of proof of activities undertaken on a regular basis on site to ensure compliance with the EA and EMP. The SEF is further a key component to demonstrate compliance to the ECO or relevant Competent Authority official during a compliance audit. The typical SEF contents should include *inter alia* the following:

1. Rehabilitation Plan and EMP

2. Approvals and licences

- 2.1. EA
- 2.2. Section 21(c) and (i) General Authorisation
- 2.3. Waste licence (if applicable)
- 2.4. Mining permit/licence (e.g. for proof of quarry legitimacy)

3. Communication

- 3.1. Important correspondence e.g. notice to Competent Authority of commencement of construction
- 3.2. Copy of public complaints register



4. Site management

- 4.1. Approved layout
- 4.2. Site instructions (or copies thereof)

5. Environmental Training

- 5.1. Proof of toolbox talks, environmental awareness and induction (incl. attendance register and training material)

6. Method statements

- 6.1. Approved method statements

7. Records

- 7.1. Record of waste generation – quantity, type, fate (incl. general/hazardous, liquid/solid)
- 7.2. Proof of legal/safe waste disposal
- 7.3. Record of chemicals on site and Material Safety Data Sheets (MSDS)
- 7.4. Record of water usage (if applicable)
- 7.5. Log of topsoil samples (if applicable)

8. Audits

- 8.1. ECO audit reports
- 8.2. Internal audits/check conducted by the Implementing Entity
- 8.3. Incident and non-conformance reports

Typical examples of checklists and other types of record keeping are included in Annexure B.

2.2.2 Progress / Site Meetings

Environmental issues shall be put on the agenda as a discussion point during these meetings. The Implementer, or a designated person involved with environmental issues on the project, shall attend the progress and/or site meetings on a regular basis to provide feedback on any outstanding or contentious environmental matter.

2.2.3 Failure to comply with the EA and EMPr

The WfWetlands Programme, as the holder of the Environmental Authorisation, is responsible for ensuring compliance with the conditions by any person acting on their behalf including Implementing Entities. The EA holder must notify the DEA in writing within the period specific in the EA if any condition in the Environmental Authorisation is or cannot be complied with. Upon receiving such notification the DEA (Compliance Directorate) will assess the reported non-conformance and inform the EA holder of further actions and submissions required.

In addition to the above, the ECO may order the Implementing Entity to suspend part or all of the works if, based on the ECO's reasoned opinion, the Implementing Entity has, is in the process of or will cause significant environmental damage and/or cause a non-conformance to the EA and/or EMPr. The ECO shall report this instruction to the WfWetlands' *Deputy Director: Programme Implementation* **within 24 hours** of the instruction being issued. Should the aforementioned suspension of work be as a result of negligence or actions by the Implementing Entity, no extension of time will be granted for such delays and all costs will be borne by the Implementing Entity. Apart from direct non-compliance with the EA or EMPr, the following will be regarded as indirect non-compliance:

- Failure to comply with corrective or other instructions issued by the Implementing Entities, ECO or Competent Authority within a specified time.
- Failure to produce the supporting documentation proving compliance with the EA or EMPr.
- Failure to ensure that sub-contractors appointed by the Implementing Entity comply with the EA and EMPr.



3 PRECONSTRUCTION/PLANNING PHASE

3.1 Compliance with environmental legislation

Ensure relevant approvals from regulatory authorities are obtained, in particular in terms of:

- National Environmental Management Act (No. 107 of 1998) (NEMA), as amended;
- National Water Act (No. 36 of 1998);
- National Environmental Management: Biodiversity Act, 2004 (No. 10 of 2004);
- National Forests Act (No. 84 of 1998);
- National Heritage Resources Act (No. 25 of 1999); and
- Other provincial and local environmental legislation.

3.2 Submission of method statements

- Method Statements must be compiled by the Implementing Entity.
- All Method Statements must be submitted and approved prior to site establishment commencing.
- The content and required actions of the Method Statements must be communicated to site staff through a compulsory environmental induction.
- Approved Method Statements will be dated and signed by all relevant parties (Implementing Entity, ECO, DEA, Engineer).
- Should a Method Statement need to be revised, a formal revision will be issued, signed and dated. The updated Method Statement will be filed in the SEF.
- The submitted Method Statements (see Annexure B) will include but not be limited to:
 - Site division, demarcation and no-go areas (incl. site camp establishment, access, construction working widths).
 - Site clearance and topsoil management.
 - Stockpiling and laydown areas.
 - Solid waste management (general and hazardous, incl. disposal).
 - Hazardous substances storage and management.
 - Contaminated water management and disposal.
 - Cement storage and handling as well as concrete batching.
 - Fuel storage and management.
 - Ablution facilities and eating areas.
 - Dust and noise/nuisance control.
 - Protection of flora, fauna and natural features.
 - Stormwater management and erosion.



- Site de-establishment and rehabilitation.
- The submission of a site layout plan (see Annexure B) by the IE to the ECO for approval is compulsory. The layout plan must indicate all areas of relevance including *inter alia*:
 - The location of the site camp as well as the site camp layout indicating the location of materials storage (general and hazardous), fuel storage, the site office, ablution facilities, vehicle/machinery parking areas.
 - Access to the site camp and intervention sites.
 - Any required stormwater management measures such as diversion berms, cut-off drains, silt fences etc.
 - Stockpiling and laydown areas.
 - Concrete/mortar mixing/batching areas.
 - No-go or sensitive areas.
 - Limit(s) of the construction footprint.

The layout plan must take into consideration the buffer distances and restrictions as specified in the EMPr. Where applicable²² the IE must make use of multiple layout plans to indicate the location of the abovementioned areas.

3.3 Environmental induction/training

Training and induction forms an integral part of ensuring and maintaining compliance with the EA and EMPr. Every person on site needs to understand the importance of compliance with the EA and EMPr and their specific role(s) in achieving this. Environmental induction and/or training must be specific or relevant to the level of responsibility of the person receiving the training. Environmental training and/or induction shall comply with the following requirements:

- The Implementing Entity and any other staff with management responsibilities (e.g. HSE officer and the foreman) will undergo environmental compliance training prior to construction commencing. The induction/training shall include project specific requirements for compliance with the EA and EMPr and responsibilities assigned to each party.
- Once the Method Statement is approved, a copy of the Method Statement must be circulated and communicated to the responsible parties (see Section 3.2).
- General staff will receive a simplified environmental induction and/or training before the commencement of construction (i.e. site establishment). The induction/training shall address, but not be limited to, basic environmental awareness, basic health and safety awareness, prevention of water, soil, and air pollution, prevention of soil erosion and sedimentation, basic principles of materials handling and storage, fire risks, protection of fauna and flora, removal of invasive alien species (if relevant), emergencies and incident responses, spill response provisions, social responsibility, and administrative and reporting procedures.
- All project personnel shall further be trained in basic wetland awareness, including a basic understanding of the components of wetlands, how wetlands function, the benefits they provide,

²² Where the “site” covers an extensive area or where a large number of interventions are to be constructed.



why they need to be conserved and used sustainably, and the importance of rehabilitation in contributing to wetland conservation and sustainable use.

- Where work takes place in areas containing dangerous game, especially nature reserves and national parks, participants shall receive training in basic animal behaviour. A person trained in dangerous animal behaviour shall be present and suitably equipped to deal with such threats at all times. Before work commences each day, the site shall be checked for dangerous animals by the trained person. First aid training shall include current treatments for snakebites.
- Provision must be made for quarterly refresher environmental training to be undertaken during the course of the contract. The Implementing Entity shall ensure that all attendees sign an attendance register, and shall provide the Implementer with a copy of the attendance register the day after each course.
- Daily/weekly *Toolbox Talks* should include an environmental topic/issue in addition to a Health and Safety topic/issue.
- Proof (training material, attendance registers, photos) of training and attendance to be filed in SEF.
- Include environmental considerations as an item on the agenda of the monthly site meetings.



4 CONSTRUCTION PHASE

4.1 Compliance with the EA and successful implementation of EMPr, environmental specifications and other permits/licences

Identified impacts: The EA, EMPr and other relevant permits and licences are only of value if the conditions/requirements contained in them are adhered to. As these documents are legal documents, non-conformance in terms of adherence/implementation may constitute an offence and be subject to suspension of the authorisation/permit/licence and possible penalties or fines.

Objective of improved management:

- Continued and consistent compliance with the EA and EMPr as well as environmental specifications and other permits/licences

Specifications:

- The ECO shall be responsible for the implementation of this EMPr for the duration of the construction phase and until rehabilitation is completed.
- The ECO shall have full access to the site at all times.
- Audits²³ undertaken by the ECO shall comply with the requirements of GN R982 (2014, as amended).
- Although the EA/licence/permit holder can transpose contractual liabilities to the Implementing Entity in terms of compliance with the EA, EMPr, Environmental Specification and any other relevant permits/licenses, the EA/licence/permit holder will remain legally liable in terms of compliance.

Table 2: Compliance with the EA and successful implementation of EMPr, environmental specifications and other permits/licences

| Management Measure | Detailed Description | Responsibility |
|--------------------|---|-------------------------------------|
| Avoidance | <ul style="list-style-type: none"> A copy of the EA, EMPr, Environmental Specifications and any other relevant permits/licenses will be kept in the SEF on site. The Implementing Entity will familiarise himself/herself with the contents and requirements of the EA, EMPr, Environmental Specifications and any other relevant permits/licenses. | Implementing Entity, EA holder, ECO |

²³ The ECO is responsible for providing an independent evaluation of compliance with the EMPr and not for enforcement of the conditions of the EMPr. The responsibility of enforcement of the conditions of the EMPr lies with the EA holder.



| Management Measure | Detailed Description | Responsibility |
|--|--|-------------------------------------|
| | <ul style="list-style-type: none"> The Implementing Entity and/or EA holder will not knowingly proceed with any action which might compromise compliance with the EA, EMPr, Environmental Specifications or any other relevant permits/licenses. | |
| Mitigation | <ul style="list-style-type: none"> Should a situation arise where compliance with the EA, EMPr, Environmental Specifications or any other relevant permits/licenses is likely to be compromised/deviated from due to exceptional circumstances or a change in scope of work, the Implementing Entity will notify the ECO immediately. The ECO will assess the type of deviation and its significance and will advise the Implementing Entity whether the deviation requires an amendment to the EA, EMPr, Environmental Specifications or any other relevant permits/licenses. | Implementing Entity, EA holder, ECO |
| Stop work | <ul style="list-style-type: none"> Should a situation arise where there is accidental or intentional non-conformance with the EA, EMPr, Environmental Specification and any other relevant permits/licenses, the ECO may order all work to stop until such non-conformance has been assessed, reported to the relevant authority (if necessary) and appropriately mitigated A non-conformance will be recorded in writing by the ECO with a description (and photographic evidence where applicable) of the incident/non-conformance. A non-conformance report will contain detailed actions and action dates for each responsible party and will be signed off by the ECO and IE once completed/closed out. | Implementing Entity, EA holder, ECO |
| Monitoring method and frequency | <ul style="list-style-type: none"> Daily/weekly monitoring by Implementing Entity. Formal monthly audits by ECO. | Implementing Entity, EA holder, ECO |
| Management outcomes | <ul style="list-style-type: none"> Full and continued compliance with the EA, EMPr, Environmental Specifications and any other relevant permits/licenses. Identification of possible deviations in advance to avoid non-conformances. Independent and impartial monitoring of compliance by the ECO. | Implementing Entity, EA holder, ECO |



4.2 Site establishment

Identified impacts: Site establishment can often have a significant environmental impact in terms of vegetation clearance and/or the construction footprint and therefore needs to be carefully managed. It is also usually during site establishment that the site camp and laydown areas are identified and demarcated. If the aforementioned is not properly planned, it could have several secondary impacts such as water pollution, soil contamination, erosion and excessive dust.

Objective of improved management:

- To avoid excessive disturbance in terms of vegetation clearance and the construction footprint.
- Ensure that activities/facilities/site structures with pollution potential are located outside buffer zones and no-go areas, preferably in already disturbed or transformed areas. Examples include the site camp, material laydown areas, concrete batching plant, ablution facilities etc.
- Ensure that all activities remain within the approved construction footprint.

Specifications:

- Site establishment will not commence until such time that the EA appeal period has passed and will further be subject to the approval of the required method statements by the ECO.
- The wetland boundary shall be demarcated on the site plan and on site.
- Demarcation will be by means of brightly painted/white pegs/poles at least 1.5m in height and placed at regular (10m for linear or on every corner for non-linear) intervals on both sides of the approved construction footprint. **Demarcation shall be maintained for the duration of construction.**
- Danger tape and/or snow/barrier netting shall only be used for health and safety requirements along excavations or high risk areas.
- All areas outside approved and demarcated footprint are to be treated as no-go areas.

Table 3: Specific avoidance, mitigation and cessation management measures related to impacts identified with site establishment

| Management Measure | Detailed Description | Responsibility |
|--------------------|---|---------------------|
| Avoidance | <ul style="list-style-type: none"> • The Implementing Entity must prioritise the use of disturbed areas for site camp establishment, laydown areas and stockpile areas. • The site camp shall be clearly demarcated and fenced subsequent to approval of the ECO. | Implementing Entity |



| Management Measure | Detailed Description | Responsibility |
|--|--|--------------------------|
| | <ul style="list-style-type: none"> The site camp, laydown and stockpile areas may not be established within any environmentally sensitive area. Refer to Annexure C for sensitivity and wetland boundary map. Should an extension/amendment to the construction footprint be required, the Implementing Entity must submit such a request to the ECO for approval prior to extending the construction footprint. All work will be executed within the approved working area. Temporary laydown areas will not be used for a period exceeding four (4) weeks and must be approved by the ECO prior to being used. Temporary laydown areas must be demarcated should it fall outside the approved construction footprint. The Implementing Entity is to ensure that all staff (e.g. plant operators, general workers) are informed of no-go areas as part of the induction/environmental awareness training. | |
| Mitigation | <ul style="list-style-type: none"> Should the Implementing Entity disturb an area outside the approved footprint, then the Implementing Entity will be held liable to reinstate the impacted area to its original condition. All temporary footprint areas must be reinstated/rehabilitated at the end of construction. | Implementing Entity |
| Stop work | <ul style="list-style-type: none"> Should the Implementing Entity fail to remain within the approved construction footprint or intentionally/negligently cause damage to a natural feature in a no-go area, the ECO reserves the right to suspend or partially suspend construction via written instruction in order to allow for the assessment, reporting and rectification of the impact. The aforementioned will be determined by the type and significance of the non-conformance and the risk of it reoccurring should construction proceed. | ECO, Engineer |
| Monitoring method and frequency | <ul style="list-style-type: none"> Daily and weekly monitoring/inspections by the Implementing Entity. Formal monthly audits by the ECO. | ECO, Implementing Entity |



| Management Measure | Detailed Description | Responsibility |
|----------------------------|--|-------------------------------------|
| Management outcomes | <ul style="list-style-type: none"> • Method Statements are submitted at least 14 days prior to the commencement of site establishment. • Site establishment only commences after approval of the Method Statements. • Already disturbed areas are prioritised for site camp, laydown and stockpile areas. • Construction footprint and vegetation clearance is controlled and kept to a minimum. • Activities are restricted to within the approved construction footprint. • Demarcation remains visible and in place for the duration of construction. | Implementing Entity, EA holder, ECO |



4.3 Channels of communication for public complaints

Identified impacts: The construction activities could lead to nuisance impacts and impacts on the adjacent properties. This may result in complaints from the public and/or adjacent landowners

Objectives of improved management:

- To record and address (within a reasonable timeframe) any complaints by the public arising from the construction activities and the impacts thereof.

Specifications: None

Table 4: Specific avoidance, mitigation and cessation management measures related to impacts identified with public complaints

| Management Measure | Detailed Description | Responsibility |
|--------------------|--|---------------------|
| Avoidance | <ul style="list-style-type: none"> • The IE must contact the landowner and/or occupier of the land where the construction is to take place at last 10 working days prior to moving onto site. • The IE must confirm the procedure to be followed for access including gates which must remain locked or open. • The Implementing Entity must ensure that the site remains neat and that no littering occurs. • Ensure that the public and adjacent landowners are informed well in advance of any construction activities to take place in the vicinity of their properties. • Where the site is located in a nature reserve/park, the Implementing Entity must familiarise him/herself with the rules and regulations of the reserve/park and where necessary include such information in the environmental induction and training. • Where the site is frequently visited by tourists, the Implementing Entity must ensure that his/her site does not cause a visual or noise disturbance. • Also refer to the Code of Conduct attached under Annexure A. | Implementing Entity |
| Mitigation | <ul style="list-style-type: none"> • Provide a contact number of person responsible for the site on the site signage. • Maintain a complaints register on site to allow public complaints to be recorded. | Implementing Entity |



| Management Measure | Detailed Description | Responsibility |
|--|--|--------------------------|
| | <ul style="list-style-type: none"> • Verbal complaints must be recorded within 24 hours of being received with a copy provided to the complainant. • Actions to address the complaints must be recorded in writing with sign-off by the ECO once the actions have been completed. • Address all complaints within a reasonable timeframe (24 hours for initial contact and 5 working days to resolve minor issues or complaints). • Ensure that actions are recorded in the SEF and the actions are implemented to avoid the future complaints regarding the same issue. | |
| Stop work | <ul style="list-style-type: none"> • Should a complaint relate to an action by the Implementing Entity which can cause/has caused a serious health and safety or environmental impact, the ECO may suspend or partially suspend work via instruction from the Engineer in order to assess the impact/complaint and identify any remedial actions required. | ECO |
| Monitoring method and frequency | <ul style="list-style-type: none"> • Reporting of serious complaints within 24 hrs to the ECO. • Address all complaints within a reasonable timeframe (24 hours for initial contact and 5 working days to resolve minor issues or complaints). • Ensure that all complaints are recorded in the complaints registered and that remedial actions are recorded, implemented and maintained. • Daily and weekly monitoring/inspections by the Implementing Entity. • Formal monthly audits by the ECO. | Implementing Entity, ECO |
| Management outcomes | <ul style="list-style-type: none"> • The public is timeously informed of construction activities which might impact them. • Contact details of the Implementing Entity is visible on site signage at the site camp. • A register is available at the site camp to record any community/public complaints. | Implementing Entity, ECO |



| Management Measure | Detailed Description | Responsibility |
|--------------------|--|----------------|
| | <ul style="list-style-type: none"> All public complaints are recorded and closed out within a reasonable timeframe (24 hours for initial contact and 5 working days to resolve minor issues or complaints). Repeat complaints regarding the same matter/issue are avoided. | |



4.4 Vegetation clearance

Identified impacts: Various activities that take place during the construction phase require the removal of vegetation, including clearing of the construction footprint for construction activities, site camp establishment, laydown and stockpile areas and access roads.

Objective of improved management:

- To retain natural vegetation in terrestrially sensitive areas.
- To minimise the extent of disturbance of vegetation/habitats on-site.
- Avoid the loss of species of conservation concern.

Specifications:

- Vegetation clearance must be restricted to the approved construction footprint.
- Removal of vegetation must occur at increments and must only be done up to two weeks ahead of actual construction commencing in an area.
- No burning of vegetation will be allowed.
- Where vegetation consists of grasses, bulbs and shrubs, it will be cleared (i.e. complete removal of the vegetation with its root system) as part of the removal of topsoil (i.e. to a maximum depth of 30cm) in order to maximise organic content and the available seedbank in the topsoil.
- Where vegetation consists predominately of reeds, the reeds will be slashed/cut to 30cm in height, measured from ground level, with the remainder of the plant and its root/rhizome system removed with the topsoil layer (i.e. at a maximum depth of 30cm).
- Vegetation/ plant material is not allowed to be disposed of as waste at a landfill site and should be stored for mulching purposes upon completion of the construction works.

Table 5: Specific avoidance, mitigation and cessation management measures related to impacts identified with vegetation clearance

| Management Measure | Detailed Description | Responsibility |
|--------------------|--|--------------------------|
| Avoidance | <ul style="list-style-type: none"> • Limit vegetation clearance in “sensitive areas” as identified in the BAR and as indicated on the maps under Annexure C. • Prioritise the use of already disturbed and degraded areas for site camps, laydown and stockpiling areas. | Implementing Entity, ECO |



| Management Measure | Detailed Description | Responsibility |
|--|--|------------------------------------|
| | <ul style="list-style-type: none"> Do not remove/clear vegetation outside the approved construction footprint. Ensure that site demarcation is maintained throughout the construction phase. Clearly mark shrubs and trees which should not be disturbed/damaged during construction. Remove/relocate species of conservation concern where possible and practical. | |
| Mitigation | <ul style="list-style-type: none"> Ensure that all temporary footprint areas are rehabilitated at the completion of construction in a specific area. Ensure that topsoil is removed and conserved in order to ensure successful revegetation/rehabilitation (also see Section 4.5). Any area disturbed outside the approved construction footprint must be reinstated at the Implementing Entity's cost to the satisfaction of the ECO. Ensure that sufficient funds are allocated in the BoQ for rehabilitation of temporary footprints. | Implementing Entity, ECO, Engineer |
| Stop work | <ul style="list-style-type: none"> Should the Implementing Entity fail to remain within the approved construction footprint or intentionally/negligently cause damage to a natural feature/vegetation in a no-go area, the ECO reserves the right to suspend or partially suspend construction via instruction from the EA holder in order to allow for the assessment, reporting and rectification of the impact. The aforementioned will be determined by the type and significance of the non-conformance and the risk of it reoccurring should construction proceed. | ECO, Engineer |
| Monitoring method and frequency | <ul style="list-style-type: none"> Daily and weekly monitoring/inspections by the Implementing Entity. Formal monthly audits by the ECO. | Implementing Entity, ECO |
| Management outcomes | <ul style="list-style-type: none"> Work is contained to the approved construction footprint. Site demarcation is maintained for the duration of construction. | Implementing Entity |



| Management Measure | Detailed Description | Responsibility |
|--------------------|--|----------------|
| | <ul style="list-style-type: none"> • Vegetation clearance is limited in sensitive areas. • No site camps, laydown or stockpile areas in sensitive areas. • Plants of conservation concern are relocated where possible and feasible (with the necessary permits/licences/approvals in place). • Temporary footprint areas are rehabilitated once work in an area has been completed. • Topsoil is removed and managed properly (see Section 4.5 below) to aid in successful rehabilitation. | |



4.5 Topsoil management

Identified impacts: Topsoil is an essential component to achieve successful rehabilitation/revegetation of a disturbed area. Poor topsoil management practices such as double handling, compaction, contamination, erosion and failing to control weeds/alien invasive species on stockpiles all contribute to the degradation and loss of topsoil. This in turn compromises the success of rehabilitation or results in additional costs to improve or import topsoil.

Objective of improved management:

- To ensure that topsoil is properly removed and managed during construction in order to enable successful rehabilitation at the completion of construction.

Specifications:

- Topsoil must be removed to a maximum depth of 30cm.
- Where the topsoil layer is shallow or alternating in depth, it must be removed to the maximum depth possible.
- Topsoil removal must occur at increments and will only be done up to two weeks ahead of actual construction commencing in an area.
- Topsoil will be removed with the appropriate equipment i.e. pointed or flat tip shovel/spade and a wheelbarrow.
- Topsoil stockpiles must be stored on level areas to a maximum height of 1.5m. The stockpile areas will be properly planned and will be approved as part of the site demarcation process and will be indicated on the site layout plan.
- Stockpiles will not block access routes or endanger any person or animal.
- The stockpiles must be protected from erosion and contamination by subsoil or imported materials.
- Topsoil will not be driven over or compacted and stockpiles will not be reworked or moved unnecessarily.
- Topsoil stockpiles must be kept free of weeds for the duration of construction until reapplied during rehabilitation.
- Topsoil will only be reapplied after all civil work has been completed in order to avoid compaction.

Working in peat wetlands:

Some of the wetlands identified for priority rehabilitation may occur in soils with a high organic composition, known as peat. These soils hold huge importance globally due to their nature to hold high levels of carbon (known as carbon sequestration). The following considerations should be made for site clearance in peatlands:



- Work shall only be done in periods with low rainfall (Winter rainfall areas - November to March and Summer rainfall areas - May to September).
- No material will be removed from the peatland for construction purposes e.g. boulders, rocks, sand.
- All access to the intervention site in the peatland will be by foot, no vehicles will be allowed in the peatland.
- Where materials need to be transported into the peatland, it will be done by means of wheelbarrows on demarcated walkways lined by wooden planks, geotextile or similar material.
- The Implementing Entity will use only one access path/point per Intervention Point and will not create multiple access paths or points.
- No foreign vegetable matter (e.g. mulch) may be brought into the wetland area (especially from alien species).
- Topsoil shall be removed specifically in the form of sods (20 to 20cm (length) x 20cm (width) x 20cm (depth)):
 - The first sod shall include the roots/rhizome layer (i.e. the rootstalks and their associated nodes/tubers)
 - The sods shall be stored in a wet area, on site, in their original orientation and order.
 - Vegetation can be cut short if it will make it easier to handle the sods.
 - Soil shall be stockpiled according to the different soil layers (i.e. in separate stockpiles) as per the soil profile. Where possible, soils shall be stockpiled as high as possible to retain moisture, but not higher than 0.5m.
 - Stockpiles will be located in a saturated area with shallow surface water immediately adjacent to the Intervention Point. Sods will be placed on the existing vegetation. Where vegetation height exceeds 30cm, the vegetation can be cut and used as mulch/cover layer.
 - The stockpile area will be indicated by means of painted pegs at each corner.
 - Stockpiles shall only be handled twice i.e. during removal and during placement for rehabilitation.
 - Stockpiles shall be covered with 10cm mulch or cloth (geotextile with <0.5cm aperture) to ensure that the moisture content is maintained by restricted evaporation and evapotranspiration.



Table 6: Specific avoidance, mitigation and cessation management measures related to impacts identified regarding topsoil management

| Management Measure | Detailed Description | Responsibility |
|--|--|------------------------------------|
| Avoidance | <ul style="list-style-type: none"> • Ensure topsoil is stockpiled in areas on site where opportunity for compaction and contamination due to other construction activities are limited. • Avoid moving/handling the topsoil more than twice (i.e. restricted to initial stripping and final reapplication). • Ensure weeds and alien invasive species are removed from the stockpiles prior to reaching seed formation stage. • Do not move topsoil between different areas on site i.e. it should be reapplied in the same area that it was removed from. | Implementing Entity |
| Mitigation | <ul style="list-style-type: none"> • Remove more than 15cm of topsoil where possible to compensate for areas of shallow/no topsoil as well as topsoil loss due to mismanagement. • Apply mulch to the topsoil if the topsoil quality has been impacted significantly and will compromise the success of revegetation (based on the reasoned opinion of the ECO or wetland specialist). • Enforce a stricter and more frequent weeding/alien invasive removal regime where there was failure to remove weeds/alien invasive species from topsoil stockpiles prior to seed formation stage. | Implementing Entity, ECO, Engineer |
| Stop work | N/A | |
| Monitoring method and frequency | <ul style="list-style-type: none"> • Use of approved site layout to confirm correct location of topsoil stockpiles. • Continuous monitoring during initial topsoil removal/stripping. • Weekly to bi-weekly monitoring of stockpiles for signs of erosion and weeds. • Monthly audits for general topsoil management practices. | Implementing Entity, ECO |
| Management outcomes | <ul style="list-style-type: none"> • Topsoil is removed to a minimum depth of 15cm. • Topsoil is not contaminated by other materials. | Implementing Entity |



| Management Measure | Detailed Description | Responsibility |
|--------------------|---|----------------|
| | <ul style="list-style-type: none"> • There is no compaction of topsoil. • Topsoil is not eroded or washed away. • Handling of topsoil is restricted to initial removal and final reapplication. • The topsoil applied during rehabilitation matches the quality and thickness of topsoil removed during site clearance. • Weeds and alien invasive species on topsoil stockpiles are removed on a regular basis prior to the plants reaching seed formation stage. | |



4.6 Materials management (non-hazardous)

Identified impacts:

- Material delivered to areas not approved by the ECO and Engineer e.g. outside the approved construction footprint, on steeply sloped areas, etc.
- Imported materials introduce new alien invasive species to site.
- Materials spilling from vehicles causing a safety or pollution risk.
- Materials are eroded and washed into wetland systems as a result of being stockpiled in areas with concentrated stormwater runoff or on sloped areas.
- Materials are mixed with the underlying natural ground surface causing contamination of soil, excessive quantities of material remaining on site after construction, localised plant die-off, increase in sedimentation etc.
- Wetland systems are impacted and/or polluted due to an insufficient buffer width between site camps, laydown and stockpile areas and water resource.
- Materials susceptible to wind erosion results in a dust nuisance and contamination of surrounding areas.
- Materials are stored on site for extended periods leading to the need for increased storage area due to materials not being used.

Objectives of improved management:

- Ensure material delivery and storage takes place in such a manner that it does not cause pollution or degradation of the surrounding environment.
- Plan material use and delivery in order to ensure that material storage on site does not take place for extended periods of time (i.e. > 4 weeks).
- Minimise the use of intact/undisturbed areas for material stockpiling/storage.
- Minimise exposure of materials to wind and water erosion.
- Ensure that materials are stored on site for the shortest possible period to limit the extent of areas required for storage and stockpiling.

Specifications: None



Table 7: Specific avoidance, mitigation and cessation management measures related to impacts identified with materials management (non-hazardous)

| Management Measure | Detailed Description | Responsibility |
|-------------------------|--|----------------------------|
| <p>Avoidance</p> | <ul style="list-style-type: none"> • It will be the Implementing Entity's responsibility to ensure that delivery drivers/suppliers are aware of the relevant EMPr requirements. • The Implementing Entity shall ensure that materials are sourced from legal and approved sources. If unsure the Implementing Entity will obtain permission from the ECO prior to using a certain material resource. • Imported materials shall be free of weeds, litter and contaminants. • Materials shall be appropriately secured to ensure safe passage between destinations. Loads including, but not limited to, sand, stone chip, fine vegetation, refuse, paper and cement, shall have appropriate cover to prevent them spilling from the vehicle during transit. The Implementing Entity shall be responsible for any clean-up resulting from the failure by his employees or suppliers to properly secure transported materials. • The Implementing Entity will identify appropriate storage and laydown areas prior to delivery to site. The areas will be approved by the ECO either as part of the required Method Statement or on an <i>ad hoc</i> basis. • Open, disturbed areas will be prioritised for stockpiling and laydown areas. • Bulk stockpile areas will be outside the wetland boundary and any other areas prone to seasonal flooding unless otherwise approved by the ECO. • The Implementing Entity will schedule the delivery of materials in such a manner that it does not require excessive periods (>4 weeks) of on-site storage unless otherwise approved by the ECO e.g. where delivery/source distances are excessive. • Minor stockpiles (not covering an area exceeding 4m² unless otherwise approved by the ECO) will be allowed next to an Intervention Point for specific use at the Intervention Point. • Minor stockpiles next to intervention sites will be utilised within 2 weeks of the material being stockpiled i.e. it will not be left adjacent to a planned or completed Intervention Point for an excessive period of time. | <p>Implementing Entity</p> |



| Management Measure | Detailed Description | Responsibility |
|--------------------|--|---------------------|
| | <ul style="list-style-type: none"> Laydown and storage areas where such occurs on vegetation, topsoil or in a wetland shall be on hessian, PVC sheeting or a similar material in order to separate the imported material from the vegetation/topsoil and to ensure easy and proper removal of excess material. Stockpile heights will be limited to 1.5m where the material is fine (i.e. susceptible to wind erosion) or in areas known to regularly (weekly to fortnightly basis) experience wind speeds exceeding 20km/h. Alternatively, material which can be windblown will be covered with shade cloth, PVC sheeting, hessian or similar suitable material. Stockpile areas will be flat and not subject to concentrated stormwater runoff or surface water flow. Materials such as precast pipes and culverts, gabions baskets, MacMat-R, hessian etc. can be placed directly on vegetated areas to avoid the disturbance and clearance of vegetation and topsoil. This will be at the discretion of the ECO based on the merits of avoiding vegetation and topsoil removal. | |
| Mitigation | <ul style="list-style-type: none"> Should material be washed or blown into the surrounding environment, the Implementing Entity will be responsible for the removal/recovery of such material. Whether removal/recovery is required will be determined by the ECO based on the type of material, volume of material and whether the material can be recovered/removed without causing substantial additional degradation of the surrounding environment. Materials not used at a specific Intervention Point will be removed once the activity requiring the material has been completed e.g. stones for gabions. Where sand/fill material is legally sourced from a dam, existing borrow pit or similar with clear presence of invasive alien species, the Implementing Entity will allow for a weeding programme at the on-site stockpile area and Intervention Point. The weeding programme will span a winter and summer period consecutively to ensure that introduced invasive alien and weed species are removed prior to seed formation stage. All remaining/waste material will be removed off-site before or by the end of construction. | Implementing Entity |
| Stop work | N/A | |



| Management Measure | Detailed Description | Responsibility |
|--|--|--------------------------|
| Monitoring method and frequency | <ul style="list-style-type: none"> • Daily and weekly monitoring/inspections by the Implementing Entity. • Formal monthly audits by the ECO. | Implementing Entity, ECO |
| Management outcomes | <ul style="list-style-type: none"> • Imported materials are stored/stockpiled on already disturbed areas within the approved construction footprint. • Material delivery and storage takes place as in such a manner that it does not cause pollution or degradation of the surrounding environment. • Materials are not eroded and/or deposited in the surrounding environment. • Materials are used within four weeks of delivery. • No new or additional alien invasive species are introduced via imported material. Where such are imported, the Implementing Entity implemented a weeding programme spanning at least one winter and one summer i.e. a year. • All imported material is removed from site at the completion of construction. | |



4.7 Hazardous chemicals and potential hazardous substances

Identified impacts:

- Includes, but are not limited to: drums of fuel, grease, oil, brake fluid, hydraulic fluid, paint, batteries and herbicides (for alien plant clearing), etc.
- Spills resulting in pollution of nearby aquatic systems and water resources.
- Spills resulting in soil contamination and degradation.
- Fauna and/or (indigenous) flora fatalities/die-off.
- Illegal/improper disposal of materials contaminated with hazardous product/spill.

Objectives of improved management:

- Ensure the controlled and documented management of hazardous chemicals and substances.
- Avoid and minimise spillages through proper storage and dispensing practices.
- Ensure that the appropriate mitigation measures are in place in the event of a spill.
- Ensure that hazardous materials are stored in designated/approved areas away from sensitive receptors/environments.

Specifications:

- The Implementing Entity must supply the ECO with a list of all hazardous materials that would be present on site during the construction period.

Table 8: Specific avoidance, mitigation and cessation management measures related to impacts identified with hazardous materials management

| Management Measure | Detailed Description | Responsibility |
|--------------------|---|---------------------|
| Avoidance | <ul style="list-style-type: none"> • All hazardous materials and products must be stored in containers marked as per SANS 10234 requirements i.e. in its original container. • All containers will have lids and stored in a covered and bunded area or in a flammables/hazardous store with a metal drip tray able to contain 110% of the volume of the largest container. | Implementing Entity |



| Management Measure | Detailed Description | Responsibility |
|--|---|--------------------------|
| | <ul style="list-style-type: none"> • A register of hazardous materials and products will be kept at the site officer or flammables/hazardous store together with up to date Material Safety Data Sheet (MSDS). • Containers with a volume of more than 20ℓ will have proper dispensing equipment. • Dispensing of hazardous materials into smaller containers or equipment will only occur at the site camp on a lined or impermeable surface- • Hazardous materials and products will only be stored at the site camp. | |
| Mitigation | <ul style="list-style-type: none"> • The Implementing Entity must ensure that there is an emergency procedure in place to deal with accidents and incidents (e.g. spills) arising from hazardous substances. • The Implementing Entity must ensure that all personnel on site are properly trained concerning the proper use, handling and disposal of hazardous substances. • The Implementing Entity must report major incidents to the ECO immediately. Any spill incidents must be cleaned up immediately and in according with the emergency procedure | Implementing Entity |
| Stop work | <ul style="list-style-type: none"> • Should the Implementing Entity through negligent or wilful action/behaviour cause a significant/major spill or dispose of hazardous materials illegally, the ECO reserves the right to suspend or partially suspend construction via instruction from the EA Holder in order to allow for the assessment, reporting and rectification of the impact. • Depending on the severity of the non-conformance, the ECO will also inform the relevant competent authority to confirm the Implementing Entity's liability to be prosecuted and/or fined. | ECO, EA Holder |
| Monitoring method and frequency | <ul style="list-style-type: none"> • Visual inspection. • Immediate response to spillage. • Completion of an incident form for major spillages (>5ℓ). • Reporting of major spills within 24 hrs to the ECO. | Implementing Entity, ECO |



| Management Measure | Detailed Description | Responsibility |
|----------------------------|---|--------------------------|
| | <ul style="list-style-type: none"> • Daily and weekly monitoring/inspections by the Implementing Entity. • Formal monthly audits by the ECO. | |
| Management outcomes | <ul style="list-style-type: none"> • Hazardous materials are properly managed including recording keeping, storage, dispensing and disposal. • Spillages are avoided and minimised through proper storage and dispensing practices. • All personnel on site are properly trained concerning the proper use, handling and disposal of hazardous substances. • The Implementing Entity has a designated and trained individual on-site to respond to spills on site. • Spillages are removed/cleaned/treated immediately after occurring. • Ensure that the appropriate mitigation measures are in place and implemented in the event of a spill. • Hazardous materials are stored in designated/approved areas away from sensitive receptors/environments. • Spills are reported to the ECO within 24hrs of occurring. • Spilled hazardous product and materials used for clean-up are stored and disposed of as hazardous waste or collected by a registered service provider. | Implementing Entity, ECO |



4.8 Contamination of soils and water

Identified impacts: Soil and water can be contaminated or polluted by construction activities via several pathways. In terms of soil contamination, pollution can result in the soil being unsuitable for certain land uses and it can also indirectly contribute to sustained pollution of both surface and groundwater resources. The pollution of water resources can lead to numerous direct and indirect impacts including the following:

- Water becoming unsuitable for certain uses such as human consumption and certain agricultural activities due to a decline in water quality.
- A loss of aquatic biodiversity through a change in species composition and diversity and/or species die-off in reaction to a decline in water quality.
- An increase in alien invasive fauna and flora species as a result of higher tolerance capacity in terms of water quality changes/deterioration.
- Increased costs of treating contaminated water for human consumption.

Objective of improved management:

- To conduct/manage construction activities in such a manner that the contamination of soil and water resources is avoided and/or minimised.

Specifications: None

Table 9: Specific avoidance, mitigation and cessation management measures related to impacts identified regarding contamination of soil and water

| Management Measure | Detailed Description | Responsibility |
|--------------------|--|---------------------|
| Avoidance | <ul style="list-style-type: none"> • Ensure that all equipment, machinery and vehicles are in good working order. • No maintenance will take place on site and broken equipment, machinery and vehicles must be removed off-site within 24 hours of the breakdown. • Use drip trays for all stationary or parked equipment, machinery and vehicles showing signs of leakage. • Ensure that substances that pose a risk of water/soil contamination are appropriately stored and disposed of (also refer to Section 4.7). • Site camps are not allowed in a wetland. • Hazardous materials storage areas are not allowed within 100m of watercourses. | Implementing Entity |



| Management Measure | Detailed Description | Responsibility |
|--------------------|---|---------------------|
| | <ul style="list-style-type: none"> • Concrete mixers may only operate on a stable, level site. • Concrete shall be mixed on trays or other suitable lining material to prevent contamination of the soil and/or waterbodies. • Ensure that minor mixing of concrete and mortar is done on impermeable surfaces or in wheel barrows. • Store chemicals in clearly marked, sealable containers in bunded areas as approved by the ECO. Inspect the containers at regular intervals for any leaks. • Use proper dispensing equipment on containers for hazardous products and store the dispensing equipment in weatherproof containers when not in use. • Ensure that equipment and plant is in proper working condition and do not leak fuel or oil, especially during work in or near watercourses. • Ensure designated staff are trained in the prevention and mitigation of spills. • The construction camp and any major stockpiling or storage areas should be outside any watercourse unless otherwise approved by the ECO. • Stormwater runoff must be diverted around the site camp and stockpile areas (material susceptible to erosion) by means of cut-off berms or trenches to avoid contamination of clean overland runoff. • Stockpiles (topsoil, subsoil and imported materials such as sand and fill material) must be on flat surfaces in areas which are not susceptible to concentrated stormwater runoff or flow. • Ablution facilities must be located outside the boundary of any watercourse unless otherwise approved by the ECO. Workers should not be allowed to urinate or defecate near or in bushes or rivers/streams. | |
| Mitigation | <ul style="list-style-type: none"> • All spills to be contained and adequately cleaned-up or treated <i>in situ</i>. • Conduct activities with high pollution potential in the low rainfall months. | Implementing Entity |



| Management Measure | Detailed Description | Responsibility |
|--|--|--------------------------|
| | <ul style="list-style-type: none"> Use designated washing areas for all equipment used for concrete work with the necessary mechanisms in place to retain contaminated runoff and allow for the necessary treatment/filtering of polluted water. | |
| Stop work | <ul style="list-style-type: none"> Should a major spill occur (as per Section 4.7), the ECO reserves the right to suspend or partially suspend construction via instruction from the EA Holder in order to allow for the assessment, reporting and rectification of the impact. Depending on the severity of the non-conformance and degree of negligence on the Implementing Entity's part, the ECO will also inform the relevant competent authority to confirm the Implementing Entity's liability to be prosecuted and/or fined. | ECO, EA Holder |
| Monitoring method and frequency | <ul style="list-style-type: none"> Daily visual inspection of equipment, vehicles and machinery for signs of leaks. Immediate response to spillage of product or material with pollution potential. Completion of an incident form for major spillages (>5l). Reporting of major spills within 24 hrs to the ECO. Daily and weekly monitoring/inspections by the Implementing Entity. Formal monthly audits by the ECO. | Implementing Entity, ECO |
| Management outcomes | <ul style="list-style-type: none"> All activities and materials with a notable pollution potential or located away from any watercourse unless otherwise approved by the ECO. All the necessary pollution prevention measures are in place. Plant is in good and working condition with leaks repaired immediately or the plant removed from site where more extensive repairs are required. All hazardous products/materials are handled/managed correctly as per Section 4.7. All hazardous liquid product spills are cleaned/treated/removed immediately as per procedure under Section 4.7. | Implementing Entity |



4.9 Concrete mixing and cement handling

Identified impacts: Concrete batching/mixing operations can have several impacts, most notably soil and water pollution (increase in pH, TSS, TDS and minor levels of Aluminium, Iron and Magnesium oxides) as a result of cement laden runoff not being properly contained or purposeful discharge of cement laden runoff. Poor cement handling, storage and disposal practices can also contribute to the aforementioned impacts. Hardened concrete is however stable and inert as a waste.

Objective of improved management:

- Ensure proper cement handling, storage and disposal, avoiding discharge or disposal into the environment.
- Ensure that cement laden water/runoff from concrete/mortar mixing and application activities is collected and retained on site to allow for reuse in construction activities, avoiding discharge into the environment.

Specifications:

- A concrete batching plant/portable mixer will not be allowed to operate until a temporary washwater and runoff containment system has been constructed/established.

Table 10: Specific avoidance, mitigation and cessation management measures related to impacts identified in terms of concrete batching and cement handling

| Management Measure | Detailed Description | Responsibility |
|--------------------|--|--------------------------|
| Avoidance | <ul style="list-style-type: none"> • Where concrete is mixed in bulk (i.e. portable concrete mixer), the following will apply: <ul style="list-style-type: none"> ○ The mixer will be placed on a level, surfaced/lined area. ○ Bulk mixing will not occur in the wetland unless the distance from the wetland boundary to the Intervention Point necessitates <i>in situ</i> mixing. This must be approved in all instance by the PC/ECO prior to the commencement of bulk mixing concrete. • Cement storage will be in a closed container. • Waste or contaminated cement powder will be stored in a marked container with a lid until disposal or reuse. • Cement bags must be emptied properly and stored in a weatherproof container until disposal. | Implementing Entity, ECO |



| Management Measure | Detailed Description | Responsibility |
|--|--|------------------------------------|
| | <ul style="list-style-type: none"> Minor concrete and mortar mixing will be done on an impermeable surface such as a wooden board, wheelbarrow, metal tray etc. | |
| Mitigation | <ul style="list-style-type: none"> Equipment and containers used for minor concrete/mortar work and mixing will be washed in a designated container and the contents disposed of in the settling system at the concrete batching plant. Washwater can alternatively be reused in concrete/mortar mixing or application, but may not be disposed of onto the ground surface or into a water resource. Concrete (not cement) spills will be allowed to harden and removed within 2 days for reuse or disposal as a Type 4 waste to a Class D landfill. | Implementing Entity |
| Stop work | <ul style="list-style-type: none"> Mismanagement of waste concrete and/or cement laden runoff can result in the suspension of bulk concrete mixing activities via instruction from the ECO until non-conformances have been rectified to the ECO's satisfaction. | Implementing Entity, ECO, Engineer |
| Monitoring method and frequency | <ul style="list-style-type: none"> Daily visual inspection of areas where concrete/mortar work is taking place (Foreman). Weekly inspection of settling system at batching plant (Foreman). Reporting of major spills within 24 hrs to the ECO. Formal monthly audits by the ECO. | Implementing Entity, ECO |
| Management outcomes | <ul style="list-style-type: none"> Cement laden runoff is contained to site in an appropriately sized settling system. Cement product is properly handled and stored and does not result in pollution of soil or water resources. No equipment or plant used for concrete/mortar mixing or application is washed in a watercourse. The settling system at the batching plant/portable mixer is maintained and does not overflow. Waste concrete is removed within 2 days and reused or disposed of as inert waste. | Implementing Entity |



4.10 Stormwater management, erosion and sedimentation

Identified impacts: The clearance of vegetation and earthworks associated with construction usually results in an increase in stormwater runoff volume and velocity. This in turn results in an increase in erosion and sedimentation, impacting both terrestrial and aquatic systems. Temporary structures, stockpiles and access roads can also further contribute to a concentration of runoff and resultant increase in erosion and sedimentation on site.

Objective of improved management:

- To avoid and mitigate the increase in stormwater volumes and velocity, thereby reducing erosion and sedimentation on site.

Specifications: None

Table 11: Specific avoidance, mitigation and cessation management measures related to impacts identified in terms of stormwater management, erosion and sedimentation

| Management Measure | Detailed Description | Responsibility |
|--------------------|---|---------------------|
| Avoidance | <ul style="list-style-type: none"> • Vegetation and topsoil clearance will occur at increments and will only be done up to two weeks ahead of actual construction (i.e. excavation) commencing in an area. • Material (excavated and imported) stockpiles will not be located in areas of concentrated runoff/flow. | Implementing Entity |
| Mitigation | <ul style="list-style-type: none"> • Stormwater generated on the cleared construction footprint will be allowed to discharge into the surrounding vegetation at regular intervals and will not be allowed to collect and concentrate in large volumes or discharge at high velocities. • Disturbed areas must be rehabilitated as soon as possible after construction has been completed in order to stabilise exposed surfaces which are susceptible to erosion. • Implement temporary stormwater management and erosion prevention measures in areas with high erosion potential (in consultation with the ECO). | Implementing Entity |
| Stop work | N/A | |



| Management Measure | Detailed Description | Responsibility |
|--|--|--------------------------|
| Monitoring method and frequency | <ul style="list-style-type: none"> • <i>Ad hoc</i> visual inspections of site by the Implementing Entity after rainfall exceeding 15mm per day. • Formal monthly audits by the ECO. | Implementing Entity, ECO |
| Management outcomes | <ul style="list-style-type: none"> • Exposed ground surfaces are limited and rehabilitated immediately after completion of construction activities in an area. • Stormwater runoff is dissipated and allowed to discharge at regular intervals. • Erodible stockpiles are located outside areas of stormwater concentration. • The construction site does not contribute notably to erosion on-site and in the immediate vicinity of the site. • Erosion is detected/identified and addressed/mitigated within 14 days of occurring. • Temporary stormwater management and erosion prevention measures are implemented in areas with high erosion potential of signs of extensive erosion occurring. | Implementing Entity, ECO |



4.11 Dust nuisance

Identified impacts: Construction activities will typically lead to dust generation and general exhaust emissions from vehicles and construction plant. Given the limited extent of vegetation clearance and low number of vehicles and construction plant used on a typical WfWetlands site, dust generation is expected to generally be minimal and restricted to mostly a nuisance impact.

Objective of improved management:

- To limit the generation of dust and where needed mitigate dust nuisance.

Specifications:

- Watering for dust suppression purposes is only recommended in instances where dust will create a significant health and/or safety hazard.

Table 12: Specific avoidance, mitigation and cessation management measures related to impacts identified regarding dust nuisance

| Management Measure | Detailed Description | Responsibility |
|--------------------|--|---------------------|
| Avoidance | <ul style="list-style-type: none"> • As far as possible stockpile materials which are prone to become airborne away from areas where dust will be a nuisance or a hazard. • Limit the height of stockpiles which could cause a dust nuisance to 1m. • Where the abovementioned cannot be achieved, cover stockpiles consisting mostly of fine material with shade cloth, hessian or a similar acceptable cover. • Limit earthworks in during windy conditions (i.e. winds above 40 km/h). • Limit vehicle travelling speeds on unsurfaced roads to 40 km/h. | Implementing Entity |
| Mitigation | <ul style="list-style-type: none"> • Where dust poses a notable health and/or safety hazard, implement a watering schedule to address the particular area of concern. • Ensure that a watering schedule is maintained over weekends and holidays where a dust nuisance could pose a health and/or safety hazard to the public using the road. • Record and address any public/community complaints regarding dust generation in the Complaints Register. | Implementing Entity |



| Management Measure | Detailed Description | Responsibility |
|--|---|--------------------------|
| Stop work | <ul style="list-style-type: none"> • Work causing excessive dust will be halted at wind speeds exceeding 40km/h. • Where dust generation leads to/results in a complaint by the public or landowner, the ECO reserves the right to suspend or partially suspend work on site until the source of dust is identified and mitigation measures implemented. | Implementing Entity, ECO |
| Monitoring method and frequency | <ul style="list-style-type: none"> • Daily visual monitoring. • Recording of public complaints regarding dust generation in Complaints Register. | Implementing Entity |
| Management outcomes | <ul style="list-style-type: none"> • The dustfall rate as specified under regulation 3 of GN R827 (National Environmental Management: Air Quality Act (No. 39 of 2004) - National Dust Control Regulations, 2013) is not exceeded. • Stockpiles which could cause a dust nuisance are limited to 1m in height or covered with a suitable material. • No public complaints are received regarding dust nuisance and/or health and safety hazard. • Where required, a watering schedule is implemented where required i.e. where dust causes a health and/or safety hazard. • Alternative dust binding products are used where long-term watering (> 4 weeks) over an extensive area (>1ha) is required. • Vehicle travelling speed is limited to 40km/h on unsurfaced roads. | Implementing Entity, ECO |



4.12 Noise nuisance

Identified impacts: Typical construction activities can lead to excessive noise which could cause a disturbance or nuisance to neighbouring land uses/receptors. Typical construction related noise which would usually be regarded as permissible in urban areas might also be regarded as a disturbance in areas such as nature reserves or on farms.

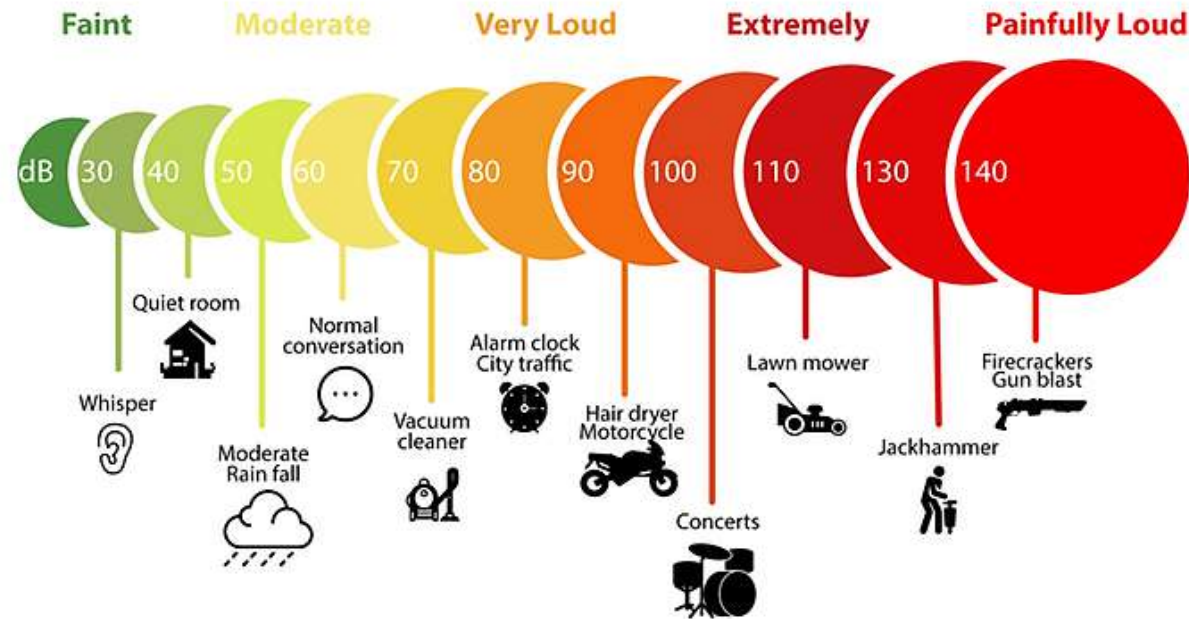


Figure 1: Example of typical everyday noises and related dB values²⁴

Objective of improved management:

- Manage the level and duration of excessive noise generated as a result of construction activities and avoid resultant public complaints. Also ensure that sensitive receptors are notified in advance where excessive noise cannot be avoided for a certain period of time or activity.

Specifications: None

²⁴ <http://ototronixdiagnostics.com/images/decibelthermometer-horizontal.jpg>



Table 13: Specific avoidance, mitigation and cessation management measures related to impacts identified regarding noise nuisance

| Management Measure | Detailed Description | Responsibility |
|--|---|--------------------------|
| Avoidance | <ul style="list-style-type: none"> • Fit silencers to equipment as required. • Ensure equipment and vehicles are properly maintained and in working order. • The Implementing Entity shall limit noise levels (e.g. install and maintain silencers on machinery). The provisions of SANS 1200A Sub-clause 4.1 regarding “built-up areas” shall apply to all areas within audible distance of residents whether in urban, peri-urban or rural areas. • Appropriate directional and intensity settings are to be maintained on all hooters and sirens. | Implementing Entity |
| Mitigation | <ul style="list-style-type: none"> • Limit working hours with noisy equipment to weekdays between 07H00 and 18H00. • Inform sensitive receptors in advance of construction activities. • Construction activities generating output levels of 50dB (A) or more, in peri-urban areas, shall be confined to the hour’s 08h00 to 17h00 Mondays to Saturdays. • Record and address any public/community complaints regarding noise generation in the Complaints Register. • Request formal approval of extension of working hours by the ECO prior to implementing extended hours or working over weekends. | Implementing Entity, ECO |
| Stop work | N/A | |
| Monitoring method and frequency | <ul style="list-style-type: none"> • Daily monitoring (by means of a dB meter application on a cell phone) should any loud activities take place. • Recording of public complaints regarding noise generation in Complaints Register. | Implementing Entity |



| Management Measure | Detailed Description | Responsibility |
|----------------------------|--|--------------------------|
| Management outcomes | <ul style="list-style-type: none"> • Compliance with the Environment Conservation Act (No. 73 of 1989): Regulations in terms of Section 25 - Noise Control (GN R154, 1992)²⁵. • No public complaints are received regarding noise generation and/or health and safety hazard. | Implementing Entity, ECO |

²⁵ Please note: These regulations have been repealed in Gauteng by Gen N 5479 / PG 75 / 19990820; in the Free State by Gen N 24 / PG 35 / 19980424 and in the Western Cape by RN 627 / PG 5309 / 19981120. Proposed Noise Control Regulations have been published for Eastern Cape under Gen N 181 / PG 824 / 20011210. Please also note that various municipalities have their own By-Laws regarding noise control.



4.13 Ablution

Identified impacts: A lack of proper and well placed ablution facilities can result in poor working conditions, health risks as well as environmental pollution.

Objective of improved management:

- To provide sanitary working conditions and avoid health risks and environmental pollution as a result of a lack of ablution facilities.

Specifications: None

Table 14: Specific avoidance, mitigation and cessation management measures related to impacts identified in terms of ablution

| Management Measure | Detailed Description | Responsibility |
|--------------------|---|---------------------|
| Avoidance | <ul style="list-style-type: none"> • Prior to construction commencing the Implementing Entity must provide sanitation for Contractors at a ratio of one (1) toilet for every 15 workers. • Toilets should preferably be located outside the wetland boundary and must be approved by the ECO. • Toilets shall be placed on level surfaces and secured to the ground outside areas susceptible to potential flooding. • The Implementing Entity shall supply toilet paper at all toilets at all times. The Implementing Entity shall ensure that the workers make use of the toilets provided. • The Implementing Entity shall be responsible for the cleaning, maintenance and servicing of the toilets. • The Implementing Entity shall ensure that the toilets are protected from vandals. No litter or general waste shall be placed in the toilets. • Upon completion of the contract, the pit latrines shall be filled in and all structures shall be removed from site. • Washing areas with soap and sufficient clean water shall be provided for hand washing after use of ablutions. | Implementing Entity |
| Mitigation | N/A | |
| Stop work | N/A | |



| Management Measure | Detailed Description | Responsibility |
|--|---|--------------------------|
| Monitoring method and frequency | <ul style="list-style-type: none"> • Daily inspection (by the Implementing Entity) to allow for timely removal/servicing of the ablution facilities. • Monthly compliance audits (including checking of disposal slips where relevant) by the ECO. | Implementing Entity, ECO |
| Management outcomes | <ul style="list-style-type: none"> • A sufficient number of ablution facilities is provided at locations approved by the ECO. • Toilets are placed on level areas and secured to the ground. • Toilets are provided at a ratio of one (1) toilet for every 15 workers. | Implementing Entity |



4.14 Waste management

Identified impacts: The construction phase will produce typical construction waste such as general waste, waste containers, cement bags, off-cuts etc. The volumes of waste to be generated on a typical WfWetlands site are expected to be low.

Objective of improved management:

- To prevent general littering and to ensure that waste is correctly stored on-site and disposed of off-site. Licenced waste disposal facilities (landfill, transfer, recycling) can be found using the search function at the following link <http://sawic.environment.gov.za/?menu=88>.

Specifications: None

Table 15: Specific avoidance, mitigation and cessation management measures related to impacts identified in terms of waste management

| Management Measure | Detailed Description | Responsibility |
|--------------------|--|---------------------|
| Avoidance | <ul style="list-style-type: none"> • Waste will not be buried or burned on site. • The quantity of materials and product brought to site will not be in notable excess of what is required for construction. • Waste from other construction sites where the Implementing Entity is working will not be brought onto site or stored on site. • Waste storage facilities will outside the wetland boundary or other sensitive areas. • Waste storage facilities and containers will be weather and scavenger proof with sufficient capacity to avoid waste accumulating outside of the facility or containers. • The Implementing Entity shall ensure that general and inert waste does not become contaminated by hazardous waste thereby generating larger volumes of hazardous waste requiring disposal at a Class A landfill. | Implementing Entity |
| Mitigation | <ul style="list-style-type: none"> • The Implementing Entity shall, in conjunction with the ECO, designate restricted areas for eating. The feeding, or leaving of food, for stray or other animals in the area is strictly prohibited. | Implementing Entity |



| Management Measure | Detailed Description | Responsibility |
|--------------------|---|----------------|
| | <ul style="list-style-type: none"> • Waste generated on site will be collected and transported to the waste storage area at the site camp on a daily basis. • Each foreman will do a daily inspection/walkthrough of his area and ensure that it is litter free. • Waste storage areas will be restricted to the site camp. • Hazardous and general waste will be separated and designated and marked bins/containers provided for each. • In the case of skippy bins being used, the bins will be covered with secured shade cloth or other cover approved by the ECO. Skippy bins are only allowed for storage of inert waste such as wood off-cuts, hardened concrete etc. • Waste transport will be by means of an appropriate vehicle with containers and/or bags secured and covered to prevent waste being blown from the vehicle during transport. • Used oil will be collected and taken to or collected by a registered oil recycling company. • Other hazardous waste as per Schedule 3 of NEM:WA and Annexure 1 of GN R634 (2013) will be disposed of at a Class A landfill or collected by an approved service provider. Proof of safe transfer/disposal will be filed in the SEF. • Waste disposal restrictions as per GN R636 (2013) shall apply. Of specific relevance is: <ul style="list-style-type: none"> ○ Lead acid batteries, corrosive or oxidizing products. ○ Waste which is flammable with a flash point lower than 61°C. ○ Waste compressed gases. ○ Re-usable, recoverable or recyclable used lubricating mineral oils, as well as oil filters, but excluding other oil containing wastes. ○ Re-usable, recoverable or recyclable used or spent solvents. | |



| Management Measure | Detailed Description | Responsibility |
|--|--|--------------------------|
| | <ul style="list-style-type: none"> ○ Lamps. ○ Tyres (whole or quartered). ○ Liquid waste or waste with a moisture content of >40%. | |
| Stop work | N/A | |
| Monitoring method and frequency | <ul style="list-style-type: none"> • Daily inspection of working area for any litter/waste. • Weekly checking of waste storage area to ensure timeous removal of waste off-site prior to storage areas becoming overfull. • Proof of safe disposal filed in Environmental File and audited monthly by ECO. | Implementing Entity, ECO |
| Management outcomes | <ul style="list-style-type: none"> • No waste disposed of or burned on site. • No visible littering. • Waste transport does not result in waste being blown from the vehicle along the route. • Appropriate and separate storage of different types of waste in approved locations. • Proper record keeping of hazardous waste generated and safe and legal disposal thereof. | Implementing Entity |



4.15 Removal of alien invasive species

Identified impacts: The WfWetlands programme often involves the removal of alien invasive species as part of an intervention(s) to improve wetland functioning. The method for removal is usually specified in the aforementioned situation. A construction site, due to its inherent disruptive nature, does however also lead to conditions ideal for the establishment of weeds/pioneer species and alien invasive species (hereafter collectively referred to as “weeds”) which could compromise the habitat integrity and ecological functioning of the wetland system as well as downstream systems. It is therefore important to implement strict control measures to ensure that alien invasive species are not introduced into a system or/and are not allowed to dominate an area post-construction.

Objective of improved management:

- No new alien invasive/pioneer species are introduced into the wetland system and catchment.
- Emerging weeds are removed prior to seed formation stage.

Specifications:

- Where project activities include the eradication of invasive alien plants, Working for Water guidelines and policies shall be adhered to.
- Weeds will be removed prior to reaching seed formation stage.
- Prior to construction, the Implementing Entity shall ensure that invasive alien vegetation is cleared from the entire site in accordance to the applicable Working for Water guidelines and policies. Follow up clearing may be necessary if the species re-establish following the initial clearing.
- Species that are declared invasive species (according to NEMBA’s Alien and Invasive Species Regulations, 2014 (GN R598)) must be recorded and polygons of the affected area must be submitted to the Working for Water national alien invasive plant database.
- The Alien and Invasive Species Lists 2016 (GN 864) will apply when identifying species which require removal/eradication.
- No trees within the environmentally sensitive areas may be removed, whether alien species or not, unless permitted by the ECO.
- Other alien species (non-listed) occurring on site may not be used in the landscaping and should be removed from site where possible.
- Where an individual or group of an invasive alien specimens/plants has potential cultural or heritage value e.g. a blue gum lane, tree at a grave site, the landowner and/or community will be consulted prior to the removal of the specimen(s). The aforementioned might also be protected under the NHRA, in which case removal might not be allowed.



Table 16: Specific avoidance, mitigation and cessation management measures related to the removal of Alien Invasive/pioneer species

| Management Measure | Detailed Description | Responsibility |
|--|--|---------------------|
| Avoidance | <ul style="list-style-type: none"> Imported material shall be free of weeds. Stockpiles (topsoil and subsoil) will be checked for emerging weeds on a fortnightly basis. Topsoil sourced from areas with notable weeds infestation will not be used in other areas for rehabilitation or fill purposes. | Implementing Entity |
| Mitigation | <ul style="list-style-type: none"> Where sand/fill material is legally sourced from a dam, existing borrow pit or similar with clear presence of invasive alien species, the Implementing Entity will allow for a weeding programme at the on-site stockpile area and Intervention Point. | Implementing Entity |
| Stop work | N/A | |
| Monitoring method and frequency | <ul style="list-style-type: none"> Fortnightly inspections of disturbed/cleared areas and stockpiles for signs of emerging weeds. Monthly audit/visual inspection by ECO. | ECO |
| Management outcomes | <ul style="list-style-type: none"> Construction activities are restricted to the approved construction footprint. The Implementing Entity's activities does not lead to the negligent or wilful damage to a natural feature. | Implementing Entity |



4.16 Impact on fauna

Identified impacts: Typical construction activities could lead to fatalities of small fauna e.g. birds, reptiles, rodents through direct impact and the destruction of habitat. The proposed project will however be limited to the road reserve which is already completely transformed and subject to daily traffic. The upgrade/replacement of culverts and bridges might result in the destruction of a number bird nests attached to the structures.

Objective of improved management:

- Protect fauna in the study area, preserve the ecological functioning along the development footprint as much as is possible.

Specifications: None

Table 17: Specific avoidance, mitigation and cessation management measures related to impacts on fauna

| Management Measure | Detailed Description | Responsibility |
|--------------------|--|---------------------|
| Avoidance | <ul style="list-style-type: none"> • Do a site walkthrough prior to construction commencing to remove any slow moving animals and to identify nesting sites, burrows etc. • Demarcate nesting sites which should be avoided as no-go areas by means of painted pegs. • Avoid disturbance of burrows, nests etc. where possible. • Create awareness of conservation of fauna during environmental induction and toolbox talks. • Fauna may not be captured, poisoned, trapped or killed. • Do not feed wildlife. • Where working in a nature reserve with potentially dangerous animals present, ensure that the team is accompanied by a suitably qualified game ranger at all times. • A speed limit of 20 km/h in nature reserves will apply unless otherwise indicated by the reserve road signage. • Inspect excavations for trapped animals prior to work commencing each day. • Do not use pesticides on site. | Implementing Entity |



| Management Measure | Detailed Description | Responsibility |
|--|---|--------------------------|
| | <ul style="list-style-type: none"> Do not burn vegetation. Store waste in weather and scavenger proof bins to avoid ingestion of waste by wildlife. | |
| Mitigation | <ul style="list-style-type: none"> Limit the construction footprint. Reinstate temporary footprints after construction has been completed. Report any animal fatalities of significance to the ECO and relevant reserve management (where applicable) and identify measures to avoid reoccurrence. | Implementing Entity, ECO |
| Stop work | N/A | |
| Monitoring method and frequency | <ul style="list-style-type: none"> Daily inspections of trenches and excavations prior to construction commencing. Weekly inspections of demarcated no-go areas. Recording of incidents and near misses (e.g. vehicle-antelope collision) in the site diary and at site meetings. Disciplinary action against any construction staff guilty of purposefully capturing, poisoning, trapping or killing wildlife. | Implementing Entity |
| Management outcomes | <ul style="list-style-type: none"> No unnecessary fauna fatalities. Limited habitat disturbance and reinstatement of temporary construction footprints. | Implementing Entity |



4.17 Protection of natural features

Identified impacts: Construction activities could result in damage to natural features such as rock outcrops and exposed rock faces/cliffs. The project is not located in an area associated with rock paintings, caves, waterfalls, trees of historical or cultural significance etc. and the risk of damage to natural features is generally considered low.

Objective of improved management:

- No damage to natural features due to negligent or purposeful action during construction.

Specifications:

- Demarcation will be by means of brightly painted/white pegs/poles at least 1.5m in height and placed at regular (10m for linear or on every corner for non-linear) intervals on both sides of the approved construction footprint.
- Danger tape and/or snow/barrier netting shall only be used for health and safety requirements along excavations or high risk areas.
- All temporary barriers and signage must be removed and the site restored on completion of the project.

Table 18: Specific avoidance, mitigation and cessation management measures related to impacts on natural features

| Management Measure | Detailed Description | Responsibility |
|--------------------|--|---------------------|
| Avoidance | <ul style="list-style-type: none"> • Construction activities shall be restricted to the approved construction footprint. • Sensitive or no-go areas in close proximity (<100m) to the construction site will be demarcated with painted pegs and marked as no-go areas. • The Implementing Entity shall not deface, paint, damage or mark any natural features (e.g. trees or rock formations) situated in or around the site for survey or other purposes unless agreed beforehand with the ECO and Engineer. | Implementing Entity |
| Mitigation | <ul style="list-style-type: none"> • Any features affected by the Implementing Entity as a result of negligence or wilful conduct shall be restored/rehabilitated to the satisfaction of the ECO and/or relevant competent authority. | Implementing Entity |
| Stop work | N/A | |



| Management Measure | Detailed Description | Responsibility |
|--|--|---------------------|
| Monitoring method and frequency | <ul style="list-style-type: none"> Monthly audit/visual inspection by ECO. | ECO |
| Management outcomes | <ul style="list-style-type: none"> Construction activities are restricted to the approved construction footprint. The Implementing Entity's activities does not lead to the negligent or wilful damage to a natural feature. | Implementing Entity |



4.18 Protection of heritage resources (including palaeontological objects)

Identified impacts: The nature and location of typical WFWetlands interventions seldom have the potential to cause the destruction or lead to the discovery of palaeontological objects such as fossils. An exception is peat wetlands which can contain fossils at usually substantial depth. Heritage resources are identified during the EIA phase and indicated as no-go areas. There is however still the opportunity for the discovery or damage to new objects during the construction phase.

Objective of improved management:

- To avoid damage to known heritage objects and to ensure a protocol is in place in the case of discovery of an unknown heritage or palaeontological object.

Specifications: None

Table 19: Specific avoidance, mitigation and cessation management measures related to impacts on heritage resources (including palaeontological objects)

| Management Measure | Detailed Description | Responsibility |
|--------------------|---|--------------------------------------|
| Avoidance | <ul style="list-style-type: none"> • The Implementing Entity shall avoid all “no-go” areas as identified during the EIA. • General staff awareness training in terms of the protection and conservation of heritage resources during the environmental induction and toolbox talks. | Implementing Entity |
| Mitigation | <ul style="list-style-type: none"> • Should any cultural, archaeological or palaeontological artefacts/objects or evidence be discovered at any stage during construction, the Implementing Entity will cease work in the vicinity of the artefact/object and inform the ECO who will in turn inform the relevant specialists and authorities. • Site staff is not allowed to collect or keep on artefact or object of cultural, archaeological or palaeontological significance. | Implementing Entity, ECO, Specialist |
| Stop work | <ul style="list-style-type: none"> • Should any cultural, archaeological or palaeontological artefacts/objects or evidence be discovered, partial suspension of construction activities in the immediate vicinity of the object might need to be required until the object can be evaluated and/or removed. | Implementing Entity, ECO, Specialist |



| Management Measure | Detailed Description | Responsibility |
|--|---|---------------------|
| Monitoring method and frequency | <ul style="list-style-type: none"> • Continuous during construction. • Monthly audit by ECO in terms of no-go areas being maintained. | Implementing Entity |
| Management outcomes | <ul style="list-style-type: none"> • No-go areas (i.e. all areas outside the approved construction footprint) are treated as no-go areas with no disturbance of heritage/cultural objects on private land adjacent to the construction site. • Proper procedure followed should any object or artefact be discovered during construction. | Implementing Entity |



4.19 Visual impact

Identified impacts: The nature of a typical WfWetlands project is seldom such that it causes significant visual disturbance, with the visual impact of the operational outcome usually being positive. Construction activities can however lead to temporary and permanent landscape scarring and impacts, which can be excessive if not controlled and mitigated properly.

Objective of improved management: Ensure that visual impacts caused by landscape scarring are minimised through proper planning and mitigated through successful rehabilitation.

Specifications: None

Table 20: Specific avoidance, mitigation and cessation management measures related to visual impacts

| Management Measure | Detailed Description | Responsibility |
|--|---|-------------------------------|
| Avoidance | <ul style="list-style-type: none"> • Avoid excessive vegetation clearance. • Ensure construction remains within the approved construction footprint. • Do not paint or deface any natural feature. | EAP, ECO, Implementing Entity |
| Mitigation | <ul style="list-style-type: none"> • Ensure that materials used for construction limits visual impacts e.g. use natural colours where possible. • Ensure that the site remains neat and tidy with no littering etc. • Use shade cloth or construction cordon in areas specifically sensitive to visual disturbances e.g. areas frequented by tourists or the public. • Record and address community complaints as per procedure specified under Section 4.3. • Ensure rehabilitation is successful as specified under Section 5. | Implementing Entity |
| Stop work | N/A | |
| Monitoring method and frequency | As specified for rehabilitation under Section 5. | ECO |



| Management Measure | Detailed Description | Responsibility |
|----------------------------|--|--------------------------|
| Management outcomes | <ul style="list-style-type: none"> • Visual impacts are minimised and managed. • The extent of disturbance is minimised and limited to the approved construction footprint. • The extent of intervention infrastructure remaining bare i.e. no vegetated is limited as best as possible. • Rehabilitation meets the requirements and targets as per Section 5. | Implementing Entity, ECO |



5 REHABILITATION PHASE

Identified impacts: Poor rehabilitation can often lead to secondary impacts such as erosion, an increase in alien invasive species, decreased biodiversity, decreased habitat connectivity, poor ecological integrity and functioning and so forth. Given the core focus of the WfWetlands programme, successful rehabilitation is also a key factor, but should entail more than the functioning of an intervention with focus on ensuring that the permanent footprint of the construction site and actual structure is minimal.

Objective of improved management:

- To ensure that construction footprints are rehabilitated and that site rehabilitation is undertaken in such a manner that the permanent footprint of the construction site of the Intervention Point is minimal.

Specifications:

- All working areas shall be rehabilitated once work has been completed and before the team leaves the site. This includes closure and rehabilitation of temporary access routes.
- All foreign material not utilised in the rehabilitation activities shall be removed from the site.
- Re-vegetation of all exposed soils, and measures to address any potential erosion risk shall be done before the team leaves the site.
- Where project activities include the eradication of invasive alien plants, Working for Water guidelines and policies shall be adhered to.
- All rehabilitated areas shall be considered “no-go” areas upon completion and the Implementing Entity shall ensure that none of his staff or equipment enters these areas.
- Specific Site Rehabilitation measures have been included in the project specific Rehabilitation Plans and shall be referred to for site closure. Due notice of the conditions of Environmental Authorisation and requirements of the General Authorisation for water uses (Annexure B) must be complied with.
- Specifically, on the completion of the construction activities:
 - All disturbed areas must be re-vegetated with local indigenous vegetation suitable to the area.
 - An active campaign for controlling new exotic and alien vegetation must be implemented within the disturbed areas.
 - Structures must be inspected after a major rain event (i.e. more than 50mm rainfall) or annually for the accumulation of debris, blockages, instabilities and erosion with concomitant remedial and maintenance actions.



Table 21: Specific avoidance, mitigation measures related to rehabilitation of the project footprint

| Management Measure | Detailed Description | Responsibility |
|--------------------|---|------------------------------------|
| Avoidance | <ul style="list-style-type: none"> • Manage site demarcation and vegetation clearance as per Sections 4.2, 4.4 and 4.5 respectively. • Ensure that sufficient topsoil is available through proper removal, stockpiling and maintenance procedures as specified under Section 4.5. | Implementing Entity |
| Mitigation | <p>General:</p> <ul style="list-style-type: none"> • All waste will be collected and removed (also look beyond immediate working area for any waste which might have been blown into the surrounding area). • All spoil and excess material must be removed material. • All spills and waste concrete must be removed. • All temporary markings and site demarcation must be removed. • All temporary construction signage must be removed. • Where temporary access roads cut across contours, diversion berms will be constructed at 30m intervals to avoid erosion and concentration of runoff prior to vegetation establishing. Mulching shall be applied to the decommissioned temporary access road. <p>Shaping and revegetation:</p> <ul style="list-style-type: none"> • Material will be backfilled in the order on which it was removed. • Compacted soil shall be scarified prior to topsoil and seed application. • Topsoil shall be applied at a minimum depth of 75mm. • Where the Implementing Entity failed to manage topsoil properly, the Implementing Entity shall be held responsible to source topsoil of similar quality from a commercial source OR to remediate compromised topsoil by means of compost, fertiliser and seeding as agreed by the ECO. | Implementing Entity, ECO, Engineer |



| Management Measure | Detailed Description | Responsibility |
|--------------------|---|----------------|
| | <ul style="list-style-type: none"> • Topsoil shall match the type and quality of topsoil removed from that area. • Special care shall be taken where rehabilitation occurs across several wetland zones and or crossing between wetland and dryland habitats to match the soil removed to the area where it is reapplied. • Seeding/re-seeding should, where possible, be timed to take advantage of the rainy season. • All reinstated slopes will be at a gradient of 1:3 to 1:4. • Slopes of 1:2 and 1:1 shall be stabilised by means of suitable geotextiles, hard structures or any other means as approved by the ECO. • Slopes of 1:2 and 1:1 will be revegetated by means of sods and/or plugs of an approved indigenous grass specie. No Kikuyu shall be used for revegetation purposes. • Local indigenous plants shall be used in the landscaping of the site. Plants that are proclaimed as problem plants or noxious weeds (see Section 4.15) are to be excluded from the landscaping plan and must be removed immediately, should they occur on site. • Plants introduced into the project sites must be guided by ecological rather than horticultural principles. For example ecological communities of indigenous plants provide more biodiversity and habitat opportunities and would blend with natural vegetation. • Where sods are sources from the surrounding environment, the sods must be 30x30cm, sourced in a checkered pattern in a flat area (i.e. not on slopes). The sods must be sourced 1m in radius apart and will be planted within 24 hours of removal unless otherwise approved by the ECO. • Should the reshaping of watercourse banks be required it will match the natural preconstruction geomorphology and slope structure. Extensive reshaping of watercourse banks (and beds if applicable) will be done under close supervision of the ECO or relevant specialist. | |



| Management Measure | Detailed Description | Responsibility |
|--|--|------------------------------------|
| | <ul style="list-style-type: none"> • Areas where sods, plugs or seeds have been used as part of slope stabilisation measures will be watered at least every third day for a minimum period of 6 weeks unless the area is in a permanently wet zone of a wetland i.e. no watering required. <p>Rehabilitation of peatlands:</p> <ul style="list-style-type: none"> • Upon rehabilitation, the removed sods and soil stockpiles shall be placed back into the system in the original order/layers (i.e. deeper layers shall be placed first with the rhizosphere layer at ground level), and orientation (according to the natural slope). Should the moisture content of the sods be less than 90% moisture, the Implementing Entity shall be required to peg them with wooden stakes. • The site shall be mulched (alternatively cloth/geotextile may be used) and livestock shall be fenced out for at least two seasons. Alternatively brush packs can be used to keep livestock and/or game away from the site. • If compaction took place, the Implementing Entity shall loosen the soil with a fork on flat surfaces, and create small contour berms on paths with slopes. | |
| Stop work | N/A | |
| Monitoring method and frequency | <ul style="list-style-type: none"> • The Implementing Entity shall notify the ECO once rehabilitation in an area has been completed. The ECO shall be responsible for the technical, not contractual, sign-off of the rehabilitated sections. Only once the rehabilitation has been approved by the ECO, may the contractual sign-off be effected. • The ECO shall conduct monthly inspections of rehabilitated areas for the first three months and then continue with inspections on a quarterly basis until the end of the contract period. • The ECO should audit the site at the end of the Implementing Entity's retention period to establish whether rehabilitation has been successfully carried out. If not, the retention money could be used to implement additional rehabilitation measures. | Implementing Entity, ECO, Engineer |
| Management outcomes | <ul style="list-style-type: none"> • Vegetation clearance is limited to the approved construction footprint. • All sloped areas are stable with no sign of slope failure or erosion. | Implementing Entity, ECO, Engineer |



6 EMERGENCY REPORTING AND PROCEDURES

The Implementing Entity must ensure that all emergency procedures are in place prior to commencing work. The nearest emergency service provider shall be identified and the up-to-date contact details of this emergency centre, as well as the police and ambulance services shall be displayed on a notice board and shall be made available to staff on-site. Emergency equipment including fire-fighting equipment shall be positioned at accessible locations near to areas where such emergencies may arise.

6.1 Emergency Awareness

The Implementing Entity shall ensure that site staff are aware of the procedure to be followed for dealing with emergencies, which shall include notifying the Implementer and relevant authorities of the event. All site staff shall be briefed regarding the requirements for dealing with potential emergencies including fires, accidental leaks and spillage of pollutants (also see Section 4.7 and 4.8), as well as Health and Safety incidents. Education of site staff shall focus on both preventative and remedial actions in the case of an emergency.

6.2 Incident Recording

The Implementing Entity shall complete an Incident Report (refer to template under Annexure B) in the case of any environmental emergencies, accidents or incidents (including near misses). The ECO shall monitor that the necessary procedures and responses are followed to close out any entries in the Environmental Incident Report. The aforementioned report will be filed in the SEF.

6.3 Fire

The Implementing Entity must take all reasonable measures to ensure that fires are not started as a result of construction activities on site, and shall also ensure that their operations comply with the Occupational Health and Safety Act (Act No. 85 of 1993). Where possible, all work done in the dry season shall be organised in liaison with the landowners so that it fits into their firebreak/ fire protection programme. No large open fires are permitted on site. Smoking on site shall only be permitted in designated areas and in the presence of a fire extinguisher.

Basic functional fire-fighting equipment (one back pack and at least five beaters) shall be made available at each work site at all times. In forestry areas there must also be two rake hoes per team. The Implementing Entity shall appoint a member of his staff to be responsible for the installation and inspection of this equipment. Where work will take place in a peatland or wetland with a high organic soil content, a Method Statement shall be prepared for the ECO's approval, detailing all the actions that will take place should a fire occur, as well as the relevant emergency contacts.

Where fuels and machines are used on site, the prescribed fire extinguishers in working condition must be made available by the Implementing Entity.

Sparks generated during welding, cutting of metal or gas cutting can result in fires. Every possible precaution shall therefore be taken when working with this equipment near potential sources of combustion. Such precautions include having an approved fire extinguisher immediately available at the site of any such activities.

The Implementing Entity is to ensure that he/ she has the contact details of the nearest fire station in case of an emergency.



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Annexure A: Basic Code of Conduct / Implementation

- Private property access is only permitted on previous agreement with the affected landowner, or will be considered trespassing. Trespassing on adjacent properties shall be subject to disciplinary and legal action.
- Ensure that closed gates are kept closed. When in doubt, the landowner should be consulted.
- Teams working outside of the active site, or requiring access to private properties are to carry identification on their persons that includes their name, position, company of employ, and reference to the Working for Wetlands Project. Similarly, such information shall be displayed on vehicle dashboards/exterior.
- All work shall be based on an approved rehabilitation plan.
- Any deviations from the planned specification need to be approved by the PC and the relevant Engineer.
- A construction supervisor shall be appointed. The appointment letter shall be made available on site.
- Work sites shall be properly planned and marked out, preferably in collaboration with the Implementing Entity. Areas shall be demarcated for vehicle access and parking, off-loading, mixing etc. (refer to Section 4.2).
- No unauthorised person may enter the work site.
- The location and position of all rehabilitation interventions shall be precisely demarcated by the Engineer and the Implementer, according to the rehabilitation plan.
- Dimensions of rehabilitation interventions shall also be marked out where appropriate (e.g. depth of an excavation).
- Implementation of all interventions will be done with a focus on cost-effectiveness and efficiency, while maintaining quality and appropriateness.



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Annexure B: Site Environmental File & Templates

| Section | Template available |
|---|--------------------|
| 1. Rehabilitation Plan and EMP | |
| 2. Implementing Entity Agreements | |
| 2.1. Undertaking in terms of Environmental Authorisation, Environmental Management Programme, Rehabilitation Plan and submitted Method Statements | Yes |
| 3. Approvals and Licenses | |
| 3.1. Environmental Authorisation | |
| 3.2. Section 21(c) and (i) General Authorisation | |
| 3.3. Waste license (if applicable) | |
| 4. Communication | |
| 4.1. Important correspondence e.g. notice to Competent Authority of commencement of construction | |
| 4.2. Copy of public complaints register | Yes |
| 5. Site Management | |
| 5.1. Approved layout | |
| 5.2. Site instructions (or copies thereof) | |
| 6. Environmental Training | |
| 6.1. Proof of toolbox talks, environmental awareness and induction (incl. attendance register and training material) | |
| 7. Method Statements | |
| 7.1. Combined method statements | Yes |
| 7.2. Additional method statements | Yes |
| 8. Records | |
| 8.1. Record of waste generation – quantity, type, fate (incl. general/hazardous, liquid/solid) | |
| 8.2. Proof of legal/safe waste disposal | |
| 8.3. Record of chemicals on site and Material Safety Data Sheets (MSDS) | |
| 8.4. Record of water usage (if applicable) | |
| 8.5. Request for deviations | Yes |
| 9. Audits | |
| 9.1. Baseline Audit | Yes |
| 9.2. ECO audit reports | |
| 9.3. Internal audits/check conducted by the Implementing Entity | Yes |
| 9.4. Incident and non-conformance reports | Yes |
| 9.5. Site closure | Yes |



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| Section | Template available |
|--|--------------------|
| 1. Rehabilitation Plan and EMP | |
| 2. Implementing Entity Agreements | |
| 2.1. Undertaking in terms of Environmental Authorisation, Environmental Management Programme, Rehabilitation Plan and submitted Method Statements | Yes |
| 3. Approvals and Licenses | |
| 3.1. Environmental Authorisation | |
| 3.2. Section 21(c) and (i) General Authorisation | |
| 3.3. Waste license (if applicable) | |
| 4. Communication | |
| 4.1. Important correspondence e.g. notice to Competent Authority of commencement of construction | |
| 4.2. Copy of public complaints register | Yes |
| 5. Site Management | |
| 5.1. Approved layout | |
| 5.2. Site instructions (or copies thereof) | |
| 6. Environmental Training | |
| 6.1. Proof of toolbox talks, environmental awareness and induction (incl. attendance register and training material) | |
| 7. Method Statements | |
| 7.1. Combined method statements | Yes |
| 7.2. Additional method statements | Yes |
| 8. Records | |
| 8.1. Record of waste generation – quantity, type, fate (incl. general/hazardous, liquid/solid) | |
| 8.2. Proof of legal/safe waste disposal | |
| 8.3. Record of chemicals on site and Material Safety Data Sheets (MSDS) | |
| 8.4. Record of water usage (if applicable) | |
| 8.5. Request for deviations | Yes |
| 9. Audits | |
| 9.1. Baseline Audit | Yes |
| 9.2. ECO audit reports | |
| 9.3. Internal audits/check conducted by the Implementing Entity | Yes |
| 9.4. Incident and non-conformance reports | Yes |
| 9.5. Site closure | Yes |



2 Implementing Entity Agreements

2.1 Undertaking in terms of Environmental Authorisation, Environmental Management Programme, Rehabilitation Plan and submitted Method Statements

PROJECT NAME:

IMPLEMENTING ENTITY:

DATE:

I, _____ (name), ID number _____ hereby confirm the following:

1. I have received a copy of the Environmental Authorisation (EA), Environmental Management Programme (EMPr) and Rehabilitation Plan for this project.
2. I have familiarised myself with the contents of aforementioned documents and understand what is required from me as the Implementing Entity.
3. I understand that I will be audited against the EA, EMPr, Rehabilitation Plan and approved Method Statements.
4. I understand that the EA is legally binding and that a contravention of an EA condition can lead to the suspension of the EA and thus construction.
5. I understand that I am responsible for the actions of my employees and will ensure that all staff on site are aware of the requirements and restrictions as per the EA, EMPr, Rehabilitation Plan and Method Statements.

Signed

Designation

Dated



| Section | Template available |
|---|--------------------|
| 1. Rehabilitation Plan and EMP | |
| 2. Implementing Entity Agreements | |
| 2.1. Undertaking in terms of Environmental Authorisation, Environmental Management Programme, Rehabilitation Plan and submitted Method Statements | Yes |
| 3. Approvals and Licenses | |
| 3.1. Environmental Authorisation | |
| 3.2. Section 21(c) and (i) General Authorisation | |
| 3.3. Waste license (if applicable) | |
| 4. Communication | |
| 4.1. Important correspondence e.g. notice to Competent Authority of commencement of construction | |
| 4.2. Copy of public complaints register | Yes |
| 5. Site Management | |
| 5.1. Approved layout | |
| 5.2. Site instructions (or copies thereof) | |
| 6. Environmental Training | |
| 6.1. Proof of toolbox talks, environmental awareness and induction (incl. attendance register and training material) | |
| 7. Method Statements | |
| 7.1. Combined method statements | Yes |
| 7.2. Additional method statements | Yes |
| 8. Records | |
| 8.1. Record of waste generation – quantity, type, fate (incl. general/hazardous, liquid/solid) | |
| 8.2. Proof of legal/safe waste disposal | |
| 8.3. Record of chemicals on site and Material Safety Data Sheets (MSDS) | |
| 8.4. Record of water usage (if applicable) | |
| 8.5. Request for deviations | Yes |
| 9. Audits | |
| 9.1. Baseline Audit | Yes |
| 9.2. ECO audit reports | |
| 9.3. Internal audits/check conducted by the Implementing Entity | Yes |
| 9.4. Incident and non-conformance reports | Yes |
| 9.5. Site closure | Yes |



4 Communication

4.2 Copy of public complaints register

COMPLAINTS REGISTER

| | |
|----------------------|-------|
| PROJECT NAME: | |
| IMPLEMENTING ENTITY: | |
| DATE: | |
| REVISION: | |



| Id. | Date | Time | Complainant Name | Address | Contact Details | Path for complaint (Phone, Discussion, email) | Description of complaint | Detail of investigation | Result of investigation | Corrective action | Response to complaint |
|-----|------|------|------------------|---------|-----------------|---|--------------------------|-------------------------|-------------------------|-------------------|-----------------------|
| 1 | | | | | | | | | | | |
| 2 | | | | | | | | | | | |
| 3 | | | | | | | | | | | |
| 4 | | | | | | | | | | | |
| 5 | | | | | | | | | | | |
| 6 | | | | | | | | | | | |
| 7 | | | | | | | | | | | |
| 8 | | | | | | | | | | | |



| Section | Template available |
|---|--------------------|
| 1. Rehabilitation Plan and EMP | |
| 2. Implementing Entity Agreements | |
| 2.1. Undertaking in terms of Environmental Authorisation, Environmental Management Programme, Rehabilitation Plan and submitted Method Statements | Yes |
| 3. Approvals and Licenses | |
| 3.1. Environmental Authorisation | |
| 3.2. Section 21(c) and (i) General Authorisation | |
| 3.3. Waste license (if applicable) | |
| 4. Communication | |
| 4.1. Important correspondence e.g. notice to Competent Authority of commencement of construction | |
| 4.2. Copy of public complaints register | Yes |
| 5. Site Management | |
| 5.1. Approved layout | |
| 5.2. Site instructions (or copies thereof) | |
| 6. Environmental Training | |
| 6.1. Proof of toolbox talks, environmental awareness and induction (incl. attendance register and training material) | |
| 7. Method Statements | |
| 7.1. Combined method statements | Yes |
| 7.2. Additional method statements | Yes |
| 8. Records | |
| 8.1. Record of waste generation – quantity, type, fate (incl. general/hazardous, liquid/solid) | |
| 8.2. Proof of legal/safe waste disposal | |
| 8.3. Record of chemicals on site and Material Safety Data Sheets (MSDS) | |
| 8.4. Record of water usage (if applicable) | |
| 8.5. Request for deviations | Yes |
| 9. Audits | |
| 9.1. Baseline Audit | Yes |
| 9.2. ECO audit reports | |
| 9.3. Internal audits/check conducted by the Implementing Entity | Yes |
| 9.4. Incident and non-conformance reports | Yes |
| 9.5. Site closure | Yes |



7 Method Statements

The Implementing Entity is to complete this section, taking cognisance of the relevant EA, EMP, environmental specifications and SANS.

7.1 Combined method statements

| | |
|-----------------------------|-------|
| PROJECT NAME: | |
| IMPLEMENTING ENTITY: | |
| DATE: | |
| REVISION: | |

ACRONYMS

| | |
|-------------|---|
| ECO | Environmental Control Officer |
| EMPr | Environmental Management Programme |
| NEMA | National Environmental Management Act (Act 107 of 1998) |
| SHE | Safety Health Environment |

DEFINITIONS

Alien species¹:

- (a) a species that is not an indigenous species; or
- (b) an indigenous species translocated or intended to be translocated to a place outside its natural distribution range in nature, but not an indigenous species that has extended its natural distribution range by natural means of migration or dispersal without human intervention.

Approved: Means approved in terms of the applicable legal requirements (e.g. NEMA approval/ Environmental Authorisation) and/or has been approved by the WfWetlands Programme's Deputy Director: Planning, Monitoring and Evaluation and/or an authorised representative of the WfWetlands Programme.

Archaeological²:

- (a) material remains resulting from human activity which are in a state of disuse and are in or on land and which are older than 100 years, including artefacts, human and hominid remains and artificial features and structures;
- (b) rock art, being any form of painting, engraving or other graphic representation on a fixed rock surface or loose rock or stone, which was executed by human agency and which is older than 100 years, including any area within 10m of such representation;
- (c) wrecks, being any vessel or aircraft, or any part thereof, which was wrecked in South Africa, whether on land, in the internal waters, the territorial waters or in the maritime culture zone of the

¹ National Environmental Management: Biodiversity Act (No. 10 of 2004)

² National Heritage Resources Act (No. 25 of 1999)



Republic, as defined respectively in sections 3, 4 and 6 of the Maritime Zones Act, 1994 (Act No. 15 of 1994), and any cargo, debris or artefacts found or associated therewith, which is older than 60 years or which the South African Heritage Resource Agency (SAHRA) considers to be worthy of conservation; and

Auditing³: A systematic, documented, periodic and objective evaluation which provides verifiable findings, in a structured and systematic manner, on:

(a) the level of performance against and compliance of an organisation or project with the provisions of the requisite environmental authorisation or Environmental Management Programme (EMPr) and, where applicable, the closure plan; and

(b) the ability of the measures contained in the EMPr, and where applicable the closure plan, to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity.

Authority: National, regional or local authority, that has a decision-making role or interest in the project.

Best Management Practice (BMP): Procedures and guidelines to ensure the effective and appropriate implementation of wetland rehabilitation by WfWetlands implementers.

Cement laden water: Means water (fresh or wash water) which has been in contact with partially cured concrete/mortar or raw cement product and which contains suspended and dissolved cement solids.

Commence: The start of any physical activity, including site preparation and any other activity on site furtherance of a listed activity or specified activity, but does not include any activity required for the purposes of an investigation or feasibility study as long as such investigation or feasibility study does not constitute a listed activity or specified activity.

Contaminated water: Means water contaminated by the Implementing Entity's activities such as with hazardous substances, hydrocarbons, paints, solvents and runoff from plant, workshop or personnel wash areas but excludes water containing cement/ concrete or silt.

Corrective (or remedial) action: Reactive response required to address an environmental problem that is in conflict with the requirements of the EMPr. The need for corrective action may be determined through monitoring, audits or management review.

Dam⁴: Any barrier dam and any other form of impoundment used for the storage of water, excluding reservoirs.

Dangerous goods: Goods containing any of the substances as contemplated in South African National Standard No. 10234, supplement 2008 1.00: designated "*List of classification and labelling of chemicals in accordance with the Globally Harmonized Systems (GHS)*" published by Standards South Africa, and where the presence of such goods, regardless of quantity, in a blend or mixture, causes such blend or mixture to have one or more of the characteristics listed in the Hazard Statements in section 4.2.3, namely physical hazards, health hazards or environmental hazards.

Decommissioning⁵: To take out of active service permanently or dismantle partly or wholly, or closure of a facility to the extent that it cannot be readily re-commissioned.

³ Regulation 34 of GN R982 (2014, as amended) of NEMA

⁴ GN R983 (2014, as amended) of NEMA

⁵ GN R983 (2014, as amended) of NEMA



Dust⁶: Any material composed of particles small enough to pass through a 1 mm screen and large enough to settle by virtue of their weight into the sampling container from the ambient air.

Eco-log: A cylindrical sleeve made from, for example wire mesh, filled with organic material and/or soil used to prevent and/or repair minor erosion.

Endangered species: Means any indigenous species listed as an endangered species in terms of section 56 of the National Environmental Management Biodiversity Act ((No. 10 of 2004).

Endemic: An "endemic" is a species that grows in a particular area (i.e. it is endemic to that region) and has a restricted distribution. It is only found in a particular place. Whether something is endemic or not depends on the geographical boundaries of the area in question and the area can be defined at different scales.

Environment⁷: Means the surroundings within which humans exist and that are made up of:

- i. the land, water and atmosphere of the earth;
- ii. micro-organisms, plant and animal life;
- iii. any part or combination of i) and ii) and the interrelationships among and between them; and
- iv. the physical, chemical, aesthetic and cultural properties and conditions of the foregoing that influence human health and well-being.

Environmental impact: An environmental change caused by some human act.

Environmental impact: Change in an environment resulting from the effect of an activity on the environment, whether positive or negative. Impacts may be the direct consequence of an individual's or organisation's activities or may be indirectly caused by them (DEAT, 1998).

Erosion: The loss of soil through the action of water, wind, ice or other agents, including the subsidence of soil.

Gabion: A structure made of wire mesh baskets filled with regularly sized stones, and used to prevent and/or repair erosion. They are flexible and permeable structures which allow water to filter through them. Vegetation and other biota can also establish in/around the habitat they create.

Hazard: Means a source of or exposure to danger.

Invasive alien species control:

- (a) to combat or eradicate an alien or invasive species; or
- (b) where such eradication is not possible, to prevent, as far as may be practicable, the recurrence, re-establishment, re-growth, multiplication, propagation, regeneration or spreading of an alien or invasive species.

Implementing Entity: The entity responsible for the construction of WfWetlands rehabilitation interventions by means of various contracted teams.

Indigenous vegetation⁸: Refers to vegetation consisting of indigenous plant species occurring naturally in an area, regardless of the level of alien infestation and where the topsoil has not been lawfully disturbed during the preceding ten years.

⁶ National Dust Regulations GN R827 (2013)

⁷ NEMA

⁸ GN R983 (2014, as amended) of NEMA



Interested and Affected Parties (I&APs)⁹:

(a) all persons who, as a consequence of the public participation process conducted in respect of that application, have submitted written comments or attended meetings with the proponent, applicant or EAP;

(b) all persons who have requested the proponent or applicant, in writing, for their names to be placed on the register; c) all organs of state which have jurisdiction in respect of the activity to which the application relates.

Intervention: An engineered structure such as a concrete or gabion weir, earthworks or revegetation that achieves identified objectives within a wetland e.g. raising of the water table within a drainage canal.

Invasive species¹⁰: Means any species whose establishment and spread outside of its natural distribution range-

(a) threaten ecosystems, habitats or other species or have demonstrable potential to threaten ecosystems, habitats or other species; and

(b) may result in economic or environmental harm or harm to human health.

Listed invasive species: Any invasive species listed in terms of sections 66(1), 67(1), 70(1)(a), 71(3) and 71A of the National Environmental: Biodiversity Act (No. 10 of 2004).¹¹

Maintenance period: The period after the Establishment Period (Practical Completion), up to and until the end of the Maintenance Period (i.e. a period of 12 months).

Maintenance¹²: Means actions performed to keep a structure or system functioning or in service on the same location, capacity and footprint.

Mine:

(a) used as a noun-

any excavation in the earth, including any portion under the sea or under other water or in any residue deposit, as well as any borehole, whether being worked or not, made for the purpose of searching for or winning a mineral;

any other place where a mineral resource is being extracted, including the mining area and all buildings, structures, machinery, residue stockpiles, access roads or objects situated on such area and which are used or intended to be used in connection with such searching, winning or extraction or processing of such mineral resource; and

(b) used as a verb-

in the mining of any mineral, in or under the earth, water or any residue deposit, whether by underground or open working or otherwise and includes any operation or activity incidental thereto, in, on or under the relevant mining area.

Mitigation: Actions to reduce the impact of a particular activity.

Mitigation¹³: Means to anticipate and prevent negative impacts and risks, then to minimise them, rehabilitate or repair impacts to the extent feasible;

⁹ Regulation 42 GN R983 (2014, as amended) of NEMA

¹⁰ National Environmental Management: Biodiversity Act (No. 10 of 2004)

¹¹ Also refer to GN 864 (2016): Alien and Invasive Species Lists

¹² GN R983 (2014, as amended) of NEMA

¹³ GN R983 (2014, as amended) of NEMA



Monitoring¹⁴: The repetitive and continued observation, measurement and evaluation of environmental criteria to follow changes over a period of time and to assess the efficiency of control measures.

Nursery conditions: This refers to the necessary conditions that must be in place for maintaining strong healthy growth in all container plant materials on site. This includes for the protection of all container plants against wind, frost, direct sunlight, pests, disease and drought. It also includes for the provision of adequate and suitable water supply, fertilisers and all other measures necessary to maintain strong and healthy plant growth.

Offensive odour: Any smell which is considered to be malodorous or a nuisance to a reasonable person.

Pollution¹⁵: Means any change in the environment caused by substances;

(ii) radioactive or other waves; or

(iii) noise, odours, dust or heat,

emitted from any activity, including the storage or treatment of waste or substances, construction and the provision of services, whether engaged in by any person or an organ of state, where that change has an adverse effect on human health or wellbeing or on the composition, resilience and productivity of natural or managed ecosystems, or on materials useful to people, or will have such an effect in the future.

Post-construction: Refers to the period of 12 months after the completion of the construction works, the onset coinciding with the maintenance period..

Potentially hazardous substance: Any substance or mixture of substances, product or material declared to be a hazardous substance under section 2(1) of the Hazardous Substance Act (1973).

Pre-construction: Refers to the period leading up to the establishment on site by the Implementing Entity.

Project: A defined area for which an approved rehabilitation plan exists for the WfWetlands Programme.

Quaternary Catchment: A fourth order catchment in a hierarchal classification system in which a primary catchment is the major unit and that is also the "principal water management unit in South Africa"¹⁶

Reasonable: Means, unless the context indicates otherwise, reasonable in the opinion of the relevant environmental authority.

Rehabilitation: Refers to re-instating the driving ecological forces (including hydrological, geomorphological and biological processes) that underlie a wetland, so as to improve the wetland's health and the ecological services that it delivers; and

Restoring processes and characteristics that are sympathetic to and not conflicting with the natural dynamic of an ecological or physical system¹⁷.

Significant impact: Means an impact that may have a notable effect on one or more aspects of the environment or may result in k with accepted environmental quality standards, thresholds or targets

¹⁴ DEAT, 1998

¹⁵ National Environmental Management Act (No. 107 of 1998, as amended)

¹⁶ DWS Groundwater Dictionary. Available online:

[http://www.dwaf.gov.za/Groundwater/Groundwater Dictionary/index.html?introduction_quaternary_catchment.htm](http://www.dwaf.gov.za/Groundwater/Groundwater%20Dictionary/index.html?introduction_quaternary_catchment.htm)

¹⁷ Wetland Management Series: WET-Origins, WRC Report TT 334/08, March 2008



and is determined through rating the positive and negative effects of an impact on the environment based on criteria such as duration, magnitude, intensity and probability of occurrence.

Silt laden water: Means water (mostly overland surface runoff) containing a substantial concentration of suspended solids with increased turbidity. Usually occurs as a result of exposed/cleared ground surfaces, concentration of runoff and/or erosion of excavated or imported materials.

Site: This is the area described in the approved/authorised rehabilitation plan for the implementation of the rehabilitation measures. Where the area is not demarcated, it will include all adjacent areas, which are reasonably required for the activities for the Implementing Entity, and approved for such use by the Environmental Control Officer (ECO).

Slope: The inclination of a surface expressed as 1 unit of rise or fall for so many horizontal units.

Subsoil: The soil horizons between the topsoil horizon and the underlying parent rock.

Topsoil: The upper soil profile irrespective of the fertility appearance, structure, agriculture potential, fertility and composition of the soil, usually containing organic material and which is colour specific. Also referred to as the "O" and "A" horizons.

Waste: Any substance, material or object, that is unwanted, rejected, abandoned, discarded or disposed of, or that is intended or required to be discarded or disposed of, by the holder of that substance, material or object, whether or not such substance, material or object can be re-used, recycled or recovered and includes all wastes as defined in Schedule 3 the National Environmental Management: Waste Act (No. 59 of 2008)¹⁸. Examples include construction debris, chemical waste, used oils and lubricants, batteries, metal and wood off-cuts, excess cement/ concrete, wrapping materials, timber, tins and cans, drums, wire, nails, food and domestic waste (e.g. plastic packets and wrappers).

Watercourse:

- (a) a river or spring;
- (b) a natural channel in which water flows regularly or intermitted;
- (c) a wetland, pan, lake or dam into which, or from which, water flows

A reference to a watercourse includes, where relevant, its bed and banks

Weir: A dam-type structure placed across a watercourse to raise the water table of the surrounding ground and trap sediment on the upstream face without preventing water flow. Weirs are generally used to prevent erosion from progressing up exposed gullies.

Wetland: Land which is transitional between terrestrial and aquatic systems where the water table is usually at or near the surface, or the land is periodically covered with shallow water and which in normal circumstances supports or would support vegetation typically adapted to life in saturated soils¹⁹ and,

Land where an excess of water is the dominant factor determining the nature of the soil development and the types of plants living there²⁰.

¹⁸ National Environmental Management: Waste Act (No. 59 of 2008, as amended)

¹⁹ National Water Act (No. 36 of 1998, as amended)

²⁰ Wetland Management Series: WET-Origins, WRC Report TT 334/08, March 2008



SECTION 1: SITE ESTABLISHMENT

| |
|---|
| Briefly describe where the site camp will be located. Also provide a layout on the next page. |
| Coordinates: |
| How will you demarcate the site camp (note no danger tape allowed) |
| What will the size of the site camp be? |
| Are there any sensitive areas, trees, shrubs or landscape features (e.g. a heritage site) that must be avoided to prevent disturbances and/or damage? How will disturbances or damage be prevented? |

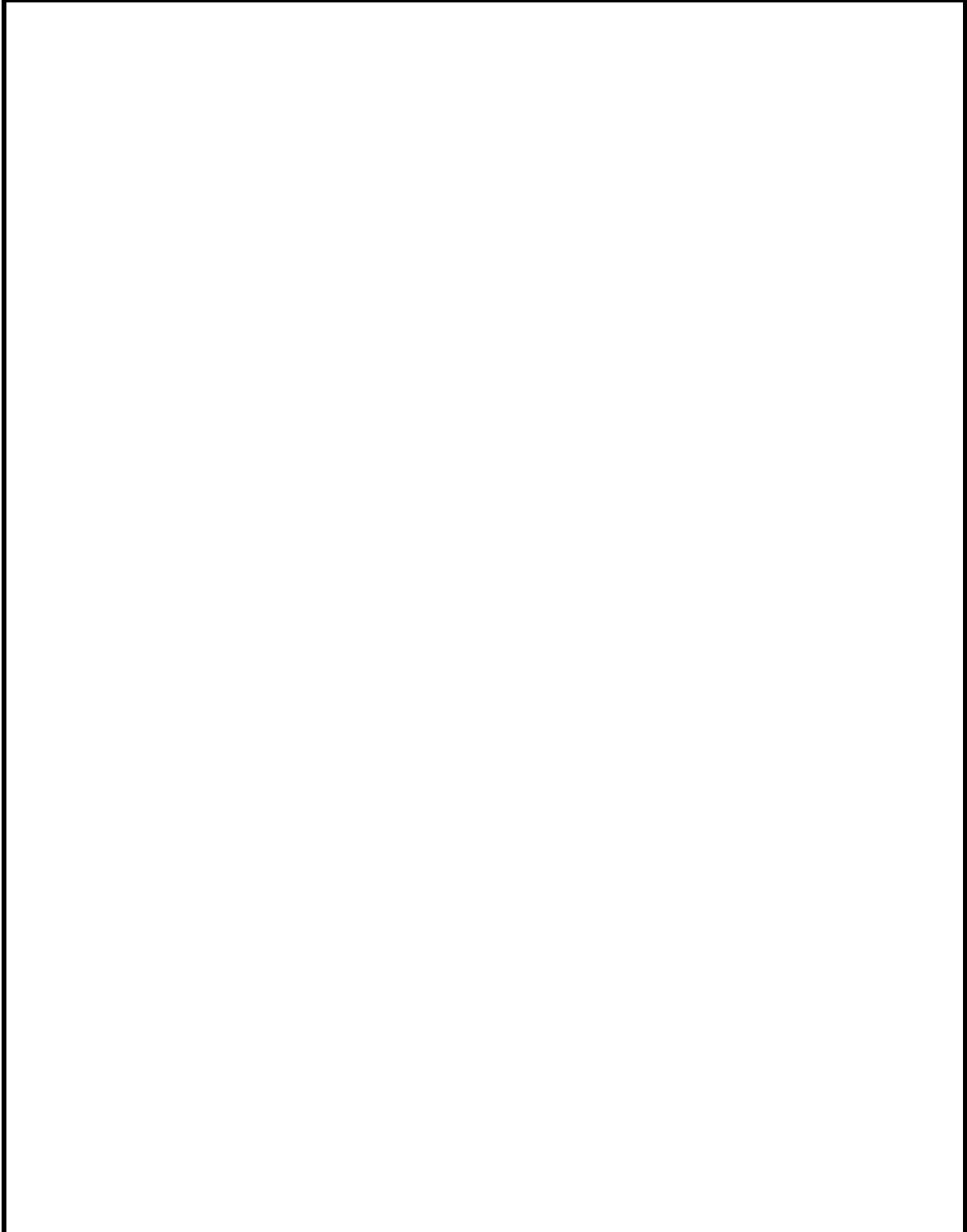
| | | |
|---|---|---|
| Is the site camp on a flat area (i.e. slope not exceeding 1:3)? | Y | N |
| Is the site camp located away from areas of stormwater concentration and areas prone to flooding? | Y | N |
| Are there any recently disturbed areas close to the site which can be used as a site camp? | Y | N |
| Is there sufficient space available at the identified site to accommodate all site camp components i.e. ablution facilities, eating areas, laydown areas, stockpile areas, vehicle parking area, concrete wash water settling area? | Y | N |
| Can the site camp remain at one location? I.e. it does not need to be moved on a regular basis (i.e. every two to four weeks) due to intervention sites being far apart? | Y | N |

If, “No”, attach the approved for request for deviation form to the back of this document.



Indicate the following (ignore if not relevant): Ablution facilities, waste storage area (general and hazardous), eating area, laydown area, stockpile area, concrete/mortar mixing/batching area, concrete wash water settling system, site office, access, vehicle parking area, any stormwater diversion measures required, the wetland boundary and sensitive features that must be avoided.

Site camp layout (please use multiple layout plans if required).



SECTION 2: SITE DEMARCATION

Indicate the working area required for each intervention site.

| Intervention No | Type of intervention | Area required (incl. temporary laydown and stockpile areas, topsoil stockpiling, equipment etc.) |
|-----------------|----------------------|--|
| | | |
| | | |
| | | |
| | | |

How will you demarcate the working area required for each intervention?

| |
|--|
| |
|--|

SECTION 3: ACCESS ROUTES/HAUL ROADS

Length of new access road required for each intervention site.

| Intervention No | Existing access (Y/N)? | Length of access road required |
|-----------------|------------------------|--------------------------------|
| | | |
| | | |
| | | |
| | | |

Describe how access roads will be made and demarcated (i.e. avoiding unnecessary access roads and the creation of multiple access roads).

| |
|--|
| |
|--|

**Include a simple layout indicating the proposed access routes as an addendum to this document.*

SECTION 4: MATERIALS HANDLING, USE AND STORAGE

| | | |
|---|----------|----------|
| Briefly list the materials (including volumes) to be used during construction (e.g. bidim, gabion baskets, stones, gravel, shuttering oil, cement, sand, MacMat-R, geotextile): | | |
| | | |
| Where will the materials be off-loaded? | | |
| | | |
| Where are you sourcing the material from? | | |
| | | |
| If it is not a commercial source, have you written obtained permission from the ECO and any other relevant party e.g. the landowner, provincial roads, Department of Mineral Resources? Please attached a copy of the written permission/consent to the end of this METHOD STATEMENT . | Y | N |



| | | |
|--|---|---|
| Are the areas you've identified for stockpiling of bulk material outside of the wetland? If "No", consult with the ECO. | Y | N |
| Are the areas you've identified for stockpiling level (i.e. not steeper than 1:30)? If no, explain the measures which will be implemented to prevent materials washing away during rainfall. | Y | N |
| | | |
| Have you planned how to get the materials from the stockpile/laydown area to the intervention working area? Please provide details on the proposed methodology below. Differentiate between the various materials where required. | Y | N |
| | | |
| Do you have sufficient covered storage space for products such as cement, and shuttering oil? Please provide details of the storage areas to be used and the type of cover e.g. roofed, shade cloth, storage container. | Y | N |
| | | |
| Do you need to stockpile bulk materials e.g. rock, sand next to an intervention? If "Yes", please provide details on the duration of stockpiling, the volume and the measures to be taken to avoid erosion of material and contamination of topsoil. | Y | N |
| | | |
| Have you worked out a delivery schedule to avoid materials being stored on site for longer than 4 weeks? | Y | N |
| Is there any material which will be prone to become windblown e.g. sand? If yes, describe how you will contain the material. | Y | N |
| | | |

SECTION 5: SOLID WASTE MANAGEMENT AND DISPOSAL

| | | |
|--|---|---|
| What types of waste is expected to be generated during the construction period? | | |
| | | |
| List any wastes that are potentially hazardous ²¹ (e.g. empty sealant containers, materials from spill kit used to clean spillages, batteries, contents from portable toilets, herbicide containers): | | |
| | | |
| How will waste be stored on site (i.e. where and in what)? | | |
| General: | | |
| Hazardous: | | |
| How often, how and where will waste be disposed of? | | |
| General: | | |
| Hazardous: | | |
| Is a substantial quantity of vegetation clearance required? | Y | N |

²¹ Refer to National Environmental Management: Waste Amendment Act 26 of 2014 and SANSA 2023/24



If "yes" indicate how vegetation material not removed as part of topsoil stripping will be dealt with e.g. chipping, brush packing, donate to local community.

* Please remember to clearly indicate waste storage areas on the layout plan.

SECTION 6: HAZARDOUS CHEMICALS AND POTENTIAL HAZARDOUS SUBSTANCES

List potentially hazardous substances to be used on the project. (*Hazardous being defined in terms of Hazardous Substances Act (No.187 of 1993) and associated regulations as well as SANS 10234. Examples include, but are not limited to: drums of fuel, grease, oil, brake fluid, hydraulic fluid, paint, batteries and herbicides (for alien plant clearing).*)

How and where will these substances be stored?

How will these substances be applied or dispensed?

How will spills be prevented?

In the event of a spill, how will it be mitigated?

Procedure:

Materials:

Person responsible and contact details:

*Attach the relevant Material Safety Data Sheet (MSDS) of hazardous materials to be stored on site as an addendum to this document.

SECTION 7: FUEL

What is the volume of fuel planned to be stored on site?

How and where will fuel be stored?

How will fuel be dispensed?

What precautions will be taken to prevent accidental spills or fires?



In the event of a spill, how will it be mitigated (i.e. cleaned up)?

Procedures:

Materials:

Person responsible and contact details:

How will hydrocarbon contaminated materials be managed and disposed of? Note hydrocarbon contaminated soil is only allowed to go to a Class A landfill (previously H:H landfill site).

SECTION 8: WATER USE

What source will be used to obtain water for construction purposes?

What source will be used to obtain water for drinking and sanitation purposes?

SECTION 9: CONCRETE BATCHING AND CEMENT HANDLING

List activities where concrete or mortar will be used:

If ready mix is not used, where and how will concrete be mixed and how will it be transported to the intervention location?

How will cement laden runoff be managed? Specify for the concrete mixing area as well as washing of equipment.

Where and how will cement be stored?

How and where will cement bags be stored until taken off site?

How will excess concrete and concrete remains be disposed of?

SECTION 10: ABLUTION FACILITIES

How many people will be on site?



How many toilets will be required at a ratio of 1 toilet for every 15 people?

What type of toilet will be used (e.g. chemical or pit latrine) and where will it be located?

If chemical toilets are used, specify how and when they'll be serviced.

SECTION 11: EATING AREAS

Where will the eating area be located?

How will you prevent littering around the eating area?

** Also clearly indicate the designated eating area(s) on the layout plan.*

SECTION 12: VEHICLES AND EQUIPMENT

Describe the number and type of vehicles to be used on site.

Where will vehicles be parked or equipment stored overnight, during weekends and during holidays?

Describe the procedure to be implemented for dealing with vehicles or equipment leaking oil or fuel:

Describe emergency equipment maintenance procedures:

| |
|----------------------------|
| Procedure: |
| Materials: |
| Person responsible: |

SECTION 13: NOISE

Are there any houses nearby? Do you need inform the landowners of any noisy activities that will take place? How will this be done?

Describe the measures to be implemented to prevent excessive noise disturbance during construction:



SECTION 14: DUST

What is the distance to the closest occupied building and what type of building is it (e.g. house, school, clinic, etc.)

List activities and material that might lead to the generation of dust:

If closer than 100m from a sensitive receptor e.g. occupied building, road, orchard, describe the activities to be implemented to limit and mitigate the generation of dust:

SECTION 15: IMPLEMENTING ENTITY’S SAFETY HEALTH ENVIROMENT (SHE) OFFICER

Who will be responsible to ensure that Health and Safety and Environmental Requirements are implemented on site? Describe responsibilities of the relevant person:

| |
|--------------------------|
| Name: |
| Responsibilities: |
| Reporting to: |

SECTION 16: ENVIRONMENTAL AWARENESS TRAINING

Describe how environmental awareness and training for senior staff will be addressed:

Describe how environmental awareness and training for general labour will be addressed:

** Please include a copy of the training material and attendance register in the environmental folder.*

SECTION 17: FIRE CONTROL

List activities on site with a fire risk e.g. smoking areas, generators.

How will fires be prevented?

Describe the procedure to be followed in case of a fire on site:

| |
|-------------------|
| Process: |
| Materials: |



Responsible person:

SECTION 18: COMMUNITY RELATIONS

Who is/are the landowner(s) of the property/properties where work will be conducted?

Has the landowner been contacted and notified of construction commencing and are there any specific concerns or requests which need to be taken into account?

Describe how good community relationships will be ensured (e.g. complaints register, contact details of Implementing Entity on site):

SECTION 19: PROTECTION OF FAUNA AND FLORA

Are you working in a conservancy, nature reserve or biosphere? If, yes, what are the precautions to be taken to avoid the accidental or intentional killing and/or trapping of animals?

Are you aware of any nesting or breeding sites close to any of the interventions?

Describe the procedure to be followed pre-construction to check for slow moving animals in the vicinity of the construction area.

Describe the procedure to be followed to check excavations of 0.5m and deeper for trapped animals.

If you are working in an area with potentially dangerous animals, describe the measures to be taken to ensure the safety of staff.

Are there any trees or shrubs that may not be disturbed or damaged? Have these been clearly marked to prevent disturbances and potential damage?

SECTION 20: STORMWATER MANAGEMENT

Is the site located in floodplain or valley? If "Yes", have you verified the typical rainfall patterns in the area and when increased flow/flooding can be expected?



Are you aware of any major dams or impoundments upstream of the site? If yes, do you have the contact details of the entity/responsible person in control of releases from the dam or impoundment and have you notified them of work being undertaken downstream?

Are you doing work in the “seasonal” or “permanent zone” of the wetland i.e. an area that is seasonally or permanently wet? If “Yes”, describe the dewatering procedures to be followed (i.e. will pumping be required, where will the pumped water be discharged, how will you reduce sediment loads in pumped water, how will you prevent scouring at the pipe outlet?)

Do you need to divert flow to enable construction/work being undertaken? If “Yes”, provide details on the type and duration of the diversion.

SECTION 21: EROSION AND SEDIMENTATION CONTROL

How will you prevent the erosion of access roads?

Will there be significant exposed areas (areas exceeding 10m²) during the rainfall season? If “Yes”, how will you protect bare soil surfaces exposed for a month or longer (e.g. stormwater diversion, temporary revegetation, geotextile)?

Do you need to work on steep (1:4) slopes? If “Yes”, describe the measures to be implemented to avoid the erosion of exposed ground surfaces, excavated material and construction material.

Are there any known stormwater structures discharging towards the site e.g. culverts, stormwater outlets. If “Yes”, is the diversion of the stormwater required to protect the site from erosion and how will it be done?

SECTION 22: PROTECTION OF ARCHAEOLOGICAL AND PALAEOLOGICAL SITES

Are you aware of any known heritage artefacts (e.g. old buildings, Stone Age sites, shell middens, caves, historic grave sites, monuments) close to the site? If “Yes”, describe how you will protect the site.

Describe the procedure to be followed in the event that an object of heritage, archaeological or paleontological is discovered:



| Section | Template available |
|---|--------------------|
| 1. Rehabilitation Plan and EMP | |
| 2. Implementing Entity Agreements | |
| 2.1. Undertaking in terms of Environmental Authorisation, Environmental Management Programme, Rehabilitation Plan and submitted Method Statements | Yes |
| 3. Approvals and Licenses | |
| 3.1. Environmental Authorisation | |
| 3.2. Section 21(c) and (i) General Authorisation | |
| 3.3. Waste license (if applicable) | |
| 4. Communication | |
| 4.1. Important correspondence e.g. notice to Competent Authority of commencement of construction | |
| 4.2. Copy of public complaints register | Yes |
| 5. Site Management | |
| 5.1. Approved layout | |
| 5.2. Site instructions (or copies thereof) | |
| 6. Environmental Training | |
| 6.1. Proof of toolbox talks, environmental awareness and induction (incl. attendance register and training material) | |
| 7. Method Statements | |
| 7.1. Combined method statements | Yes |
| 7.2. Additional method statements | Yes |
| 8. Records | |
| 8.1. Record of waste generation – quantity, type, fate (incl. general/hazardous, liquid/solid) | |
| 8.2. Proof of legal/safe waste disposal | |
| 8.3. Record of chemicals on site and Material Safety Data Sheets (MSDS) | |
| 8.4. Record of water usage (if applicable) | |
| 8.5. Request for deviations | Yes |
| 9. Audits | |
| 9.1. Baseline Audit | Yes |
| 9.2. ECO audit reports | |
| 9.3. Internal audits/check conducted by the Implementing Entity | Yes |
| 9.4. Incident and non-conformance reports | Yes |
| 9.5. Site closure | Yes |



7 Method Statements

7.2 Additional method statements

INFORMATION ON METHOD STATEMENTS

Method Statements are to be completed by the person undertaking the work (i.e. the Implementing Entity). The Method Statement will enable the potential negative environmental impacts associated with the proposed activity to be assessed.

The Method Statement can only be implemented once approved by the PC in consultation with the ECO.

The Implementing Entity (and, where relevant, any sub-contractors) must also sign the Method Statement, thereby indicating that the works will be carried out according to the methodology contained in the approved Method Statement.

The PC and/or ECO will use the Method Statement to audit compliance by the Implementing Entity with the requirements of the approved Method Statement.

Changes to the way the works are to be carried out must be reflected by amendments to the original approved Method Statement; amendments require the signature of the PC, denoting that the changed methodology or works are necessary for the successful completion of the works, and where applicable the PC will consult with the ECO regarding to environmental concerns. The Implementing Entity will also be required to sign the amended Method Statement thereby committing him/herself to the amended Method Statement.

This Method Statement MUST contain sufficient information and detail to enable the PC (and ECO where applicable) to apply his/her mind to the potential impacts of the works on the environment. The Implementing Entity will also need to thoroughly understand what is required of him/her in order to undertake the works.

THE TIME TAKEN TO PROVIDE A THOROUGH, DETAILED METHOD STATEMENT IS TIME WELL SPENT. INSUFFICIENT DETAIL WILL RESULT IN DELAYS TO THE WORKS WHILE THE METHOD STATEMENT IS REWRITTEN TO THE ASD'S SATISFACTION



METHOD STATEMENT

| | |
|-----------------------------|-------|
| PROJECT NAME: | |
| IMPLEMENTING ENTITY: | |
| DATE: | |

PROPOSED ACTIVITY *(give title of method statement):*

| |
|---|
| <i>E.g. construction of diversion structure, temporary damming of stream, deviation from standard rehabilitation procedures</i> |
|---|

| | |
|--|--|
| Scope | |
| Potential Impacts | E.g. litter, spills, damage to flora, contamination of water |
| Start Date: | |
| End Date: | |
| Description (i.e. how will the Method Statement be implemented?): | |
| Location: | |
| Person(s) responsible for implementing (Name and designation): | |



DECLARATIONS

1) Environmental Consultant/Environmental Control Officer

The work described in this Method Statement, if carried out according to the methodology described, is satisfactorily mitigated to prevent avoidable environmental harm:

Signed Print name Dated

2) Implementing Entity

I understand the contents of this Method Statement and the scope of the works required of me. I further understand that this Method Statement may be amended on application to other signatories and that the PC/ECO will audit my compliance with the contents of this Method Statement

Signed Print name Dated

3) Engineer/Engineer's Representative

The works described in this Method Statement are approved.

Signed Print name Dated

4) Approving authority: PC

Signed Print name Designation

Dated: _____



| Section | Template available |
|---|--------------------|
| 1. Rehabilitation Plan and EMP | |
| 2. Implementing Entity Agreements | |
| 2.1. Undertaking in terms of Environmental Authorisation, Environmental Management Programme, Rehabilitation Plan and submitted Method Statements | Yes |
| 3. Approvals and Licenses | |
| 3.1. Environmental Authorisation | |
| 3.2. Section 21(c) and (i) General Authorisation | |
| 3.3. Waste license (if applicable) | |
| 4. Communication | |
| 4.1. Important correspondence e.g. notice to Competent Authority of commencement of construction | |
| 4.2. Copy of public complaints register | Yes |
| 5. Site Management | |
| 5.1. Approved layout | |
| 5.2. Site instructions (or copies thereof) | |
| 6. Environmental Training | |
| 6.1. Proof of toolbox talks, environmental awareness and induction (incl. attendance register and training material) | |
| 7. Method Statements | |
| 7.1. Combined method statements | Yes |
| 7.2. Additional method statements | Yes |
| 8. Records | |
| 8.1. Record of waste generation – quantity, type, fate (incl. general/hazardous, liquid/solid) | |
| 8.2. Proof of legal/safe waste disposal | |
| 8.3. Record of chemicals on site and Material Safety Data Sheets (MSDS) | |
| 8.4. Record of water usage (if applicable) | |
| 8.5. Request for deviations | Yes |
| 9. Audits | |
| 9.1. Baseline Audit | Yes |
| 9.2. ECO audit reports | |
| 9.3. Internal audits/check conducted by the Implementing Entity | Yes |
| 9.4. Incident and non-conformance reports | Yes |
| 9.5. Site closure | Yes |



8 Records

8.5 Request for deviations from standard EMPr or Rehabilitation Plan requirement

| | |
|-----------------------------|-------|
| PROJECT NAME: | |
| IMPLEMENTING ENTITY: | |
| DATE: | |

DEVIATION 1 (*Implementing Entity to complete*)

| | |
|--|--|
| Description of deviation | <i>E.g. mixing of concrete in wetland</i> |
| Reason for deviation | <i>E.g. major wetland system resulting in excessive transport distances</i> |
| Start Date: | |
| End Date: | |
| Relevant section in EMPr | |
| Potential impacts associated with deviation | <i>E.g. concrete spills in wetland, additional vegetation clearance, water pollution</i> |
| Mitigation measures identified | <i>E.g. mixing boards, dedicated wash bins, no cement storage in wetland next to mixing area, regular clean-up</i> |

DEVIATION 2 (*Implementing Entity to complete*)

| | |
|--|--|
| Description of deviation | |
| Reason for deviation | |
| Start Date: | |
| End Date: | |
| Relevant section in EMPr | |
| Potential impacts associated with deviation | |
| Mitigation measures identified | |



PC CHECKLIST

| | | | | |
|---|-----|----|--------|--|
| Does the deviation carry a high risk e.g. pollution, structure failure | Yes | No | Unsure | If “yes” or “unsure” consult with Engineer |
| Does the proposed deviation trigger a new listed activity | Yes | No | Unsure | If “yes” or “unsure” consult with EAP |
| Does the deviation involve a change in design of the IP | Yes | No | Unsure | If “yes” or “unsure” consult with Engineer and Wetlander |
| Is the deviation outside the approved wetland system? | Yes | No | Unsure | If “yes” or “unsure” consult with EAP |



DECLARATIONS

1) Environmental Consultant/Environmental Control Officer

The work described in this request for deviation does not trigger any additional listed activities and will not result in excessive environmental damage:

Signed Print name Dated

2) Person undertaking the works/Implementing Entity

I understand the scope of deviation requested and will implement the mitigation measures as indicated.

Signed Print name Dated

3) Engineer/Engineer's Representative

The works described in this Method Statement are approved.

Signed Print name Dated

4) Approving authority

Signed Print name Designation

Dated _____



| Section | Template available |
|---|--------------------|
| 1. Rehabilitation Plan and EMP | |
| 2. Implementing Entity Agreements | |
| 2.1. Undertaking in terms of Environmental Authorisation, Environmental Management Programme, Rehabilitation Plan and submitted Method Statements | Yes |
| 3. Approvals and Licenses | |
| 3.1. Environmental Authorisation | |
| 3.2. Section 21(c) and (i) General Authorisation | |
| 3.3. Waste license (if applicable) | |
| 4. Communication | |
| 4.1. Important correspondence e.g. notice to Competent Authority of commencement of construction | |
| 4.2. Copy of public complaints register | Yes |
| 5. Site Management | |
| 5.1. Approved layout | |
| 5.2. Site instructions (or copies thereof) | |
| 6. Environmental Training | |
| 6.1. Proof of toolbox talks, environmental awareness and induction (incl. attendance register and training material) | |
| 7. Method Statements | |
| 7.1. Combined method statements | Yes |
| 7.2. Additional method statements | Yes |
| 8. Records | |
| 8.1. Record of waste generation – quantity, type, fate (incl. general/hazardous, liquid/solid) | |
| 8.2. Proof of legal/safe waste disposal | |
| 8.3. Record of chemicals on site and Material Safety Data Sheets (MSDS) | |
| 8.4. Record of water usage (if applicable) | |
| 8.5. Request for deviations | Yes |
| 9. Audits | |
| 9.1. Baseline Audit | Yes |
| 9.2. ECO audit reports | |
| 9.3. Internal audits/check conducted by the Implementing Entity | Yes |
| 9.4. Incident and non-conformance reports | Yes |
| 9.5. Site closure | Yes |



9 Audits

9.1 Baseline audit/ inspection prior to commencement of construction

| | |
|-----------------------------|-------|
| PROJECT NAME: | |
| IMPLEMENTING ENTITY: | |
| DATE: | |

SECTION 1: WETLAND ZONE IN WHICH WORK WILL BE UNDERTAKEN:

| | | | |
|-----------|----------|-----------|--------------------------|
| Permanent | Seasonal | Temporary | Outside wetland boundary |
|-----------|----------|-----------|--------------------------|

SECTION 2: CONDITION OF VEGETATION

| | | | |
|---|------|----------|------|
| Coverage: | Poor | Moderate | Good |
| Species diversity: | Poor | Moderate | Good |
| Grazing in wetland: | Yes | No | |
| Harvesting of vegetation in wetland: | Yes | No | |
| Level of alien invasive species infestation: | Low | Moderate | High |

Insert photos:

| | |
|--|--|
| | |
| | |

SECTION 3: SOIL

| | | | |
|----------------------------------|--------------------|-------------------------|---|
| Topsoil depth: | ≥10cm | ≥30cm | ≥ 50cm |
| Peat known to be present? | Yes | No | |
| Evidence of erosion | Yes | No | |
| Type of erosion | Dryland | Gullies/donga | In-stream (undercutting, lateral, scouring) |
| | Stormwater outlets | Dispersed overland flow | Tunnelling (dispersive soils) |



SECTION 4: IS THERE ANY EXISTING WASTE OR SPOIL ON SITE?

| | |
|-----|----|
| Yes | No |
|-----|----|

If yes, specify the type and estimated quantity

| |
|--|
| |
|--|

Insert photos:

| | |
|--|--|
| | |
| | |

SECTION 5: ARE THERE EXISTING ALIEN INVASIVE SPECIES ON THE SITE?

| | |
|-----|----|
| Yes | No |
|-----|----|

If yes, list the species

| |
|--|
| |
|--|

Are any of the species Category 1a or b species? (Alien and Invasive Species Regulations, 2014 - GN R598/2014)

| | |
|-----|----|
| Yes | No |
|-----|----|

If yes, list the species and number/density of plants.

| |
|--|
| |
|--|

Insert photos:

| | |
|--|--|
| | |
| | |

SECTION 6: ARE THERE EXISTING ACCESS ROADS TO THE SITE?

| | |
|-----|----|
| Yes | No |
|-----|----|

If yes, what is the condition of the road(s)?

| | | |
|------|----------|------|
| Good | Moderate | Poor |
|------|----------|------|

SECTION 7: ARE THERE OTHER IMPACTED OR DISTURBED AREAS

| | | | | |
|--------------|-------------|--------|---------------------|----------------------------|
| Cleared area | Mining area | Kraal | Previous site camps | Ploughed agricultural land |
| Roads | Settlements | Other: | | |

SECTION 8: EXISTING WATER QUALITY ISSUES

| | | | | |
|--|--------------------------------------|--------------------------|--------------------------------|--|
| High sediment loads (murky/cloudy water) | Eutrophication (excess algal growth) | High TDS (salt deposits) | Low pH (orange coloured water) | <i>E. coli</i> (leaking sewer lines, concentration of animals) |
|--|--------------------------------------|--------------------------|--------------------------------|--|



SECTION 9: IS THERE EXISTING FENCING ON THE PROPERTY WHERE THE WORK WILL BE CONDUCTED?

| | |
|-----|----|
| Yes | No |
|-----|----|

If yes, what type of fencing and what is the condition of the fencing?

| |
|--|
| |
|--|

Insert photos:

| | |
|--|--|
| | |
| | |

SECTION 10: ARE THERE ANY KNOW PROTECTED PLANT SPECIES ON SITE?

| | |
|-----|----|
| Yes | No |
|-----|----|

If yes, list the species

| |
|--|
| |
|--|

Insert photos:

| | |
|--|--|
| | |
| | |

SECTION 11: ARE THERE ANY SIGNIFICANT TREES OR CLUMPS OF TREES WHICH NEED TO BE CONSERVED?

| | |
|-----|----|
| Yes | No |
|-----|----|

If yes, specify the species and location.

| |
|--|
| |
|--|

Insert photos:

| | |
|--|--|
| | |
| | |

SECTION 12: ARE THERE ANY KNOWN OR VISIBLE HERITAGE OBJECTS (E.G. OLD KRAAL, OLD FURROW, CORNER POSTS, OLD BUILDINGS)?

| | |
|-----|----|
| Yes | No |
|-----|----|

If yes, specify the type of object and location.

| |
|--|
| |
|--|

Insert photos:

| | |
|--|--|
| | |
| | |



SECTION 13: ARE THERE ANY EXISTING ANIMAL (DOMESTIC OR WILD) CROSSINGS ON OR CLOSE TO THE SITE?

| | |
|-----|----|
| Yes | No |
|-----|----|

If, yes, will the planned work impact on the crossings and movement of the animals?

| | |
|-----|----|
| Yes | No |
|-----|----|

SECTION 14: ARE THERE ANY EXISTING SERVICES ON OR NEAR THE SITE (E.G. POWER LINES, SUB-STATIONS, PIPELINES, TELEPHONE LINES)?

| | |
|-----|----|
| Yes | No |
|-----|----|

If yes, specify the type of infrastructure and whether it will be impacted by the activities on site

| |
|--|
| |
|--|

Insert photos:

| | |
|--|--|
| | |
| | |



| Section | Template available |
|---|--------------------|
| 1. Rehabilitation Plan and EMP | |
| 2. Implementing Entity Agreements | |
| 2.1. Undertaking in terms of Environmental Authorisation, Environmental Management Programme, Rehabilitation Plan and submitted Method Statements | Yes |
| 3. Approvals and Licenses | |
| 3.1. Environmental Authorisation | |
| 3.2. Section 21(c) and (i) General Authorisation | |
| 3.3. Waste license (if applicable) | |
| 4. Communication | |
| 4.1. Important correspondence e.g. notice to Competent Authority of commencement of construction | |
| 4.2. Copy of public complaints register | Yes |
| 5. Site Management | |
| 5.1. Approved layout | |
| 5.2. Site instructions (or copies thereof) | |
| 6. Environmental Training | |
| 6.1. Proof of toolbox talks, environmental awareness and induction (incl. attendance register and training material) | |
| 7. Method Statements | |
| 7.1. Combined method statements | Yes |
| 7.2. Additional method statements | Yes |
| 8. Records | |
| 8.1. Record of waste generation – quantity, type, fate (incl. general/hazardous, liquid/solid) | |
| 8.2. Proof of legal/safe waste disposal | |
| 8.3. Record of chemicals on site and Material Safety Data Sheets (MSDS) | |
| 8.4. Record of water usage (if applicable) | |
| 8.5. Request for deviations | Yes |
| 9. Audits | |
| 9.1. Baseline Audit | Yes |
| 9.2. ECO audit reports | |
| 9.3. Internal audits/check conducted by the Implementing Entity | Yes |
| 9.4. Incident and non-conformance reports | Yes |
| 9.5. Site closure | Yes |



9 Audits

9.3 Internal audits/check conducted by the Implementing Entity

| | |
|-----------------------------|-----------------------------------|
| PROJECT NAME: | |
| IMPLEMENTING ENTITY: | |
| DATE: | |
| WEEK: | <i>E.g. Week 1 / Week 2</i> |

SECTION 1: SITE CONDITIONS

| |
|--|
| |
|--|

SECTION 2: LAYDOWN AREAS & SITE OFFICES

| ITEM | DESCRIPTION | EVALUATION | | NOTES |
|-------|---------------------------------|-----------------|-------------|-------|
| | | Not to Standard | To Standard | |
| 2.1 | Litter control | | | |
| 2.2 | Dust suppression | | | |
| 2.3 | Erosion control | | | |
| 2.4 | Storm water / Runoff control | | | |
| 2.5 | Toilets | | | |
| 2.6 | Fuel & oil storage & dispensing | | | |
| 2.7 | Material handling or Storage | | | |
| 2.8 | Waste management | | | |
| 2.8.1 | <i>Domestic Waste</i> | | | |
| 2.8.2 | <i>Hazardous Waste</i> | | | |
| 2.9 | Noise control | | | |

SECTION 3: CONSTRUCTION SITES

| ITEM | DESCRIPTION | EVALUATION | | NOTES |
|------|------------------------|-----------------|-------------|-------|
| | | Not to Standard | To Standard | |
| 3.1 | Litter control/Recycle | | | |



| | | | | |
|-------|---|--|--|--|
| 3.2 | Dust suppression | | | |
| 3.3 | Erosion control | | | |
| 3.4 | Toilets | | | |
| 3.5 | Eating areas | | | |
| 3.6 | Material handling and Storage | | | |
| 3.7 | No go areas, natural features and trees have not been damaged | | | |
| 3.8 | Drip trays | | | |
| 3.9 | Waste management | | | |
| 3.9.1 | <i>Domestic Waste</i> | | | |
| 3.9.2 | <i>Hazardous Waste</i> | | | |
| 3.10 | Noise control | | | |
| 3.11 | Environmental Awareness Training | | | |

SECTION 4: COMPLIANCE WITH THE EA CONDITIONS AND EMP AND/OR ENVIRONMENTAL INCIDENTS

SECTION 5: GENERAL NOTES



| Section | Template available |
|---|--------------------|
| 1. Rehabilitation Plan and EMP | |
| 2. Implementing Entity Agreements | |
| 2.1. Undertaking in terms of Environmental Authorisation, Environmental Management Programme, Rehabilitation Plan and submitted Method Statements | Yes |
| 3. Approvals and Licenses | |
| 3.1. Environmental Authorisation | |
| 3.2. Section 21(c) and (i) General Authorisation | |
| 3.3. Waste license (if applicable) | |
| 4. Communication | |
| 4.1. Important correspondence e.g. notice to Competent Authority of commencement of construction | |
| 4.2. Copy of public complaints register | Yes |
| 5. Site Management | |
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| 5.2. Site instructions (or copies thereof) | |
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| 6.1. Proof of toolbox talks, environmental awareness and induction (incl. attendance register and training material) | |
| 7. Method Statements | |
| 7.1. Combined method statements | Yes |
| 7.2. Additional method statements | Yes |
| 8. Records | |
| 8.1. Record of waste generation – quantity, type, fate (incl. general/hazardous, liquid/solid) | |
| 8.2. Proof of legal/safe waste disposal | |
| 8.3. Record of chemicals on site and Material Safety Data Sheets (MSDS) | |
| 8.4. Record of water usage (if applicable) | |
| 8.5. Request for deviations | Yes |
| 9. Audits | |
| 9.1. Baseline Audit | Yes |
| 9.2. ECO audit reports | |
| 9.3. Internal audits/check conducted by the Implementing Entity | Yes |
| 9.4. Incident and non-conformance reports | Yes |
| 9.5. Site closure | Yes |



9 Audits

9.4 Incident and non-conformance reports

9.4.1 Environmental Incident Report

| | |
|-----------------------------|-------|
| PROJECT NAME: | |
| IMPLEMENTING ENTITY: | |
| DATE: | |
| REVISION: | |

SECTION 1: DESCRIPTION OF INCIDENT

| |
|--|
| |
|--|

SECTION 2: REMEDIAL ACTION REQUIRED

| | |
|--|--|
| | |
| Remedial Action Due Date: | |

SECTION 3: RELEVANT DOCUMENTATION

| |
|--|
| |
|--|

SECTION 4: SIGNATURES

| | | | |
|--------------|--|-----------------------------|--|
| ECO: | | Implementing Entity: | |
| Name: | | Name: | |
| Date: | | Date: | |



SECTION 5: REMEDIAL ACTION COMPLETED

| | |
|---|--|
| Implementer to sign when remedial action has been completed and return original to ECO: | |
| Name: | |
| Date: | |

SECTION 6: REMEDIAL ACTION VERIFIED

| | | | |
|-------|--|----------------------|--|
| ECO: | | Implementing Entity: | |
| Name: | | Name: | |
| Date: | | Date: | |

SECTION 7: DRAWING/SKETCH



9.4.2 Environmental Non-Conformance Notice

| | |
|-----------------------------|-------|
| PROJECT NAME: | |
| IMPLEMENTING ENTITY: | |
| DATE: | |
| REVISION: | |

SECTION 1: INCIDENT SEVERITY

| High | Medium | Low |
|---|--------|-----|
| Number of previous similar non-conformances on same contract: | | |

SECTION 2: DESCRIPTION OF INCIDENT

SECTION 3: DRAWING/SKETCH

SECTION 4: REMEDIAL ACTION REQUIRED

| | |
|---------------------------|--|
| | |
| Remedial Action Due Date: | |



SECTION 5: DRAWING/SKETCH

| |
|--|
| |
|--|

SECTION 6: RELEVANT DOCUMENTATION

| |
|--|
| |
|--|

SECTION 7: SIGNATURES

| | | | |
|--------------|--|-----------------------------|--|
| ECO: | | Implementing Entity: | |
| Name: | | Name: | |
| Date: | | Date: | |

SECTION 8: REMEDIAL ACTION COMPLETED

| | |
|--|--|
| Implementer to sign when remedial action has been completed and return original to ECO: | |
| Name: | |
| Date: | |

SECTION 9: REMEDIAL ACTION VERIFIED

| | | | |
|--------------|--|-----------------------------|--|
| ECO: | | Implementing Entity: | |
| Name: | | Name: | |
| Date: | | Date: | |



| Section | Template available |
|---|--------------------|
| 1. Rehabilitation Plan and EMP | |
| 2. Implementing Entity Agreements | |
| 2.1. Undertaking in terms of Environmental Authorisation, Environmental Management Programme, Rehabilitation Plan and submitted Method Statements | Yes |
| 3. Approvals and Licenses | |
| 3.1. Environmental Authorisation | |
| 3.2. Section 21(c) and (i) General Authorisation | |
| 3.3. Waste license (if applicable) | |
| 4. Communication | |
| 4.1. Important correspondence e.g. notice to Competent Authority of commencement of construction | |
| 4.2. Copy of public complaints register | Yes |
| 5. Site Management | |
| 5.1. Approved layout | |
| 5.2. Site instructions (or copies thereof) | |
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| 6.1. Proof of toolbox talks, environmental awareness and induction (incl. attendance register and training material) | |
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| 8.1. Record of waste generation – quantity, type, fate (incl. general/hazardous, liquid/solid) | |
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| 8.3. Record of chemicals on site and Material Safety Data Sheets (MSDS) | |
| 8.4. Record of water usage (if applicable) | |
| 8.5. Request for deviations | Yes |
| 9. Audits | |
| 9.1. Baseline Audit | Yes |
| 9.2. ECO audit reports | |
| 9.3. Internal audits/check conducted by the Implementing Entity | Yes |
| 9.4. Incident and non-conformance reports | Yes |
| 9.5. Site closure | Yes |



9 Audits

9.5 Site closure

| |
|-----------------------------------|
| PROJECT NAME: |
| IMPLEMENTING ENTITY: |
| DATE: |

SECTION 1: SITE CLOSURE INSPECTION SHEET

| | |
|----------------------------------|--|
| Slope: | |
| Alien invasives: | |
| Topsoil: | |
| Anti-erosion: | |
| Waste: | |
| Other: | |
| Timeframe for completion: | |

PC signature

Implementing Entity
signature

Date

Date



SECTION 2: POST SITE CLOSURE INSPECTION COMMENTS

| | |
|-------------------------|--|
| Slope: | |
| Alien invasives: | |
| Topsoil: | |
| Anti-erosion: | |
| Waste: | |
| Other: | |

Outstanding items:

1. _____
2. _____
3. _____

Completion date: _____

PC signature

Implementing Entity
signature

Date

Date



Annexure C: Sensitive Areas

Sensitive areas (incl. delineated wetland boundary)



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Annexure D: Minimum Standards for Construction and Maintenance

Note that maintenance information of structures (position, numbering and BoQ) will be determined as part of the planning process (by the PC and/or the Engineer) and will be included in the Rehabilitation Plan together with new wetlands. This information will be available on WetIS for inclusion in the PIPs. It is the Implementing Entity's responsibility to make provision for maintenance activities in the PIP as discussed and agreed with the PC.

Concrete Batching

- Concrete shall be mixed according to the correct MPa and mix information as specified in the construction notes of the respective design drawings.
- All material used in the mixing of concrete are to be of good quality, clean and clear of any organic material.
- Manufacturer's directions for mixing, consistency and treatment after pouring shall be complied with.
- Cement shall be stored in dry conditions for no longer than six weeks after delivery.
- When cement is stored temporarily infield it shall be kept on a dry waterproof base with a waterproof cover.
- The batching of concrete shall be done on a smooth impermeable surface (e.g. shutter plywood sheets). The batching area shall be prepared by cutting (not removing) the existing vegetation and covering the natural ground level (NGL) with Geotextile lining (minimum A4 grade). A sand retaining berm is to be constructed on top of the geotextile on the downstream end to contain any run-off. A 250µm plastic lining is to cover the geotextile and sand berm while secured to the NGL. The prepared area should be of sufficient size to prevent overspill of any material of substance. All wastewater resulting from batching of concrete shall be disposed of via a contaminated water management system and shall not be discharged into the environment.
- Contaminated water storage areas shall not be allowed to overflow and appropriate protection from rain and flooding shall be implemented.
- A demarcated site at least 20m away from water/ wetland edge shall be used for cement mixing. No batching activities shall occur directly on unprotected ground.
- Empty cement bags shall be stored in weather proof containers to prevent windblown cement dust and water contamination. Empty cement bags shall be disposed of on a regular basis via the solid waste management system, and shall not be used for any other purpose. Unused cement bags shall be stored so as not to be affected by rain or runoff events. In this regard, closed steel containers shall be used for the storage of cement powder and any additives.
- The Implementing Entity shall ensure that sand, aggregate, cement or additives used during the mixing process are contained and covered to prevent contamination of the surrounding environment.
- The Implementing Entity shall take all reasonable measures to prevent the spillage of cement/ concrete during batching and construction operations. During pouring, the soil surface shall be protected using plastic and all visible remains of concrete shall be physically removed on completion of the cement/ concrete pour and appropriately disposed of. All spoiled and excess



aggregate/ cement/ concrete shall be removed and disposed of via the solid waste management system.

- Construction using shuttering shall take into consideration the structure design dimensions and safe working heights to prevent over extension of shuttering. Steel shuttering panel sizes shall be used to match the dimensions of the final concrete section as close as possible.
- Concrete will be mixed and used on the same day. Time from mixing to final compaction should not exceed 45 minutes.
- The maximum haul distance of mixed concrete by means of wheel barrows should be limited to ensure the maximum time from mixing to final compaction does not exceed 45 minutes.
- Where sand, stone and cement are transported by wheelbarrow to their point of mixing the distance travelled should be limited to 150m.
- Where applicable, the location of the batching site (including the location of cement stores, sand and aggregate stockpiles) shall be as approved by the PC. The concrete batching plant shall be kept neat and clean at all times.
- Water used for mixing purposes will be of suitable non-potable quality and may not be obtained from natural water resources.

Concrete Structures:

- Concrete mix to follow the design specification.
- Participants shall be trained in concrete mixing and placing by an accredited organisation prior to performing construction of concrete structures.
- Concrete to be placed in 300mm layers and vibrated using a concrete vibrator.
- Minimum 50mm cover required on all concrete reinforcing and mesh unless otherwise specified.
- 250µm plastic sheets to be placed under structure.
- All concrete walls to be fully supported until they are backfilled to the designed level.
- All mesh reinforcing to have 500mm overlaps between sheets.
- Buttresses and walls to be cast monolithically with footing.
- Construction joints to be used wherever new concrete is cast against previously cast concrete.
- If rebar or mesh crosses a construction joint, it should be continuous through the joint and extend 600mm into each side.
- Foundation improvement to be constructed from 70kg sandbags made of BIDIM A4 and filled with sand or well graded gravel, where indicated.

Gabion Structures:

- Gabion work shall be done according to design specifications.
- Participants shall be trained in gabion construction by an accredited organisation prior to performing placing or construction of gabion structures.
- Gabion baskets and Reno mattresses to be constructed of minimum double twisted, hexagonal galvanized wire mesh of nominal diameter and 80mm mesh. Frame wire to be 3.4mm outside diameter (o/d) and mesh wire to be 2.7mm o/d with partitions at 1m centres.



- Support and binding wire shall be a minimum 2.2mm. Lacing shall be done according to specification.
- Support wires (bracing) shall be in place according to manufacturer's specifications.
- All adjoining baskets shall be laced together according to manufacturer's specifications.
- Geotextile shall line all faces of the gabion baskets that are exposed to earth and certain water exposed sides with a minimum of 200mm overlap in all directions and stitched with either polyester or galvanised wire at 300mm c/c.
- Water corrosivity shall be determined at each site; if necessary PVC coated gabion wire shall be used as specified.
- Soil dispersivity shall be determined at each site. If dispersive soils are detected, the ECO / Engineer shall be contacted.
- Density of fill material shall satisfy the gabion design. Clay bricks, weathered rock and sandstone and shale shall not be used as fill material. Any unconventional fill material shall be approved by the ECO / Engineer.
- Fill material shall not be smaller than mesh size.
- Where fill material is hauled to its point of placement by means of wheelbarrows, the haul distance shall not be greater than 150m.

Stone Masonry Structures:

- Stone to be packed and mortared in place using concrete with specified strength.
- Concrete mix to follow the design specification
- 100mm - 200mm stone to be used in all stone masonry, gabions and Reno mattresses. Stone fill must be non-friable & insoluble e.g. Granite, basalt, limestone or sandstone.

Geo Cells:

- Geo cells shall not be used in conditions that exceed their design specifications.
- Geo cell material shall be UV resistant.
- Geo cells shall be anchored in by the "trench" method and in such a way that prevents undermining of the cells.
- Fill material shall conform to the design specifications. The following general rules shall be applied: If soil is used to fill the cells, it shall be re-vegetated immediately with optimum prepared soil conditions.
- If concrete is used to fill the cells, some degree of permeability of the structure shall be permitted. If concrete is used as fill, concrete baffles should be inserted or as per specified design. Rock is not suitable for this purpose.

Earth Works

- Excavations may not exceed 1.5m depth without stepping, shoring and/or reinforcement.
- All excavated material temporarily stored shall be placed on Geotextile sheets covering the NGL. If stockpiled for extended periods, it will be done so at predetermined positions approved by the ECO.
- Excavation and compaction must comply with design specifications.



- The ECO / Engineer must be consulted for work undertaken in dispersive, unstable and organic soils.
- Backfilling in trenches must be done in layers of thickness not exceeding 100mm before compaction. Each layer shall be compacted using hand compactors or mechanical rammers at optimum moisture content.
- Where excavation material is hauled by means of wheelbarrows, the haul distance shall not be greater than 150m.

All earthworks shall be undertaken in such a manner so as to minimise the extent of any impacts caused by such activities, particularly with regards to erosion and dust generation. No equipment associated with earthworks shall be allowed outside of the Site and defined access routes unless expressly permitted by the ECO / Engineer.

Rock Packing:

- Stone must be non-friable and insoluble, e.g. granite, basalt, limestone or sandstone
- Rock packs placed across a stream to be tied min 1m into each bank.
- The ECO must approve the source of rocks if not supplied by suitable rock supplier.
- The haul distance may not be greater than 150m where rocks are transported to their point of placement by means of wheel barrows
- The size of rocks must comply with the specifications shown on the drawings and must be handled in a safe manner particularly during offloading/placing. Heavy duty gloves to be worn when handling rocks.

Ecologs:

- Wooden pegs used to anchor EcoLogs are to be no less than 40mm diameter and 1000mm in length.
- Pegs should protrude no less than 600mm from the soil @ 1000 c/c.

MacMat / MacMat-R

- MacMat / MacMat-R to be installed to manufacturers specifications.

Working with Wire (Ecologs, fencing, silt traps)

- Wire used must comply with the engineer's specifications.
- The appropriate tools are to be used for safe handling of wire.
- Heavy duty gloves must be worn when handling wire.
- No loose wire/sharp edges are to remain on completed interventions.
- All excess wire must be removed from the site.
- Stakes used for pegging should not present a tripping/piercing risk (as far as practically possible).



Annexure E: Curriculum Vitae of EAP





Franci Gresse

Franci is a senior environmental practitioner in Aurecon's Cape Town office. She has been involved in various environmental investigations, including environmental impact assessments (EIA's), environmental management plans (EMP's), environmental management programmes (EMP's), rehabilitation plans maintenance management plans (MMP's) and fatal flaw analysis.

Franci has been involved with the Working for Wetlands rehabilitation programme for the past five years, of which she has been acting as the Team Leader for the environmental assessment practitioners (EAP's) for the last three years. The Working for Wetlands project won the 2012 Aurecon Chairman's Award for its positive contribution to the natural and social environment. In addition, Franci has also been involved with a number of projects in the renewable energy sector.

Franci served on the committee of the South African affiliate of the International Association for Impact Assessment (IAIA) for the Western Cape Branch from 2009 to 2011, and remains a member. She completed a Bachelor of Science and an Honours Degree in Conservation Ecology at the University of Stellenbosch (South Africa).

Qualifications

BSc (Hons) Conservation Ecology

Member, International Association of Impact Assessment (IAIA)

Specialisation

Environmental Impact Assessment Practitioner

Years in industry

8.08

Experience

Working for Wetlands plan 2016 - 2018, Regional South Africa, Department of Environmental Affairs: Natural Resource Management Directorate, 06/2016 - Date, Project Leader

The Natural Resource Management Directorate of the Department of Environmental Affairs appointed Aurecon to provide environmental and engineering services for the Working for Wetlands Programme which is a national wetland rehabilitation programme. Responsibilities include the management and coordination of the overall project, management of the environmental authorisation component of the project, as well as the compilation of basic assessment reports (BAR) for the country. Other responsibilities include the compilation of wetland rehabilitation plans for the Western Cape, Northern Cape and Limpopo Provinces, liaison with authorities and the public (public participation process) and management of wetland specialists.

Integrated Environmental Impact Assessment (EIA) for the proposed extension of the Ash Dam facility at Kriel power station, Mpumalanga Province, South Africa, Eskom Holdings, 06/2016 - date, Project Leader

Appointed by Eskom to conduct an integrated environmental impact assessment (EIA) for the proposed construction of a fourth ash dam facility at the Kriel power station. Responsible for the general project management and finances, authority liaison and the compilation and review of the EIA documentation.

Amended Environmental and Socio-Economic Impact Assessment for a concentrated solar plant facility near Arandis in the Erongo Region, 02/2016 – 10/2016, Project Leader

Aurecon was appointed by the NamPower to amend the Environmental Clearance Certificate (ECC) issued for the Erongo Coal-fired Power Station at Arandis, to a Concentrated Solar Plant. Responsibilities included project management (programme, finances and client expectations), liaison with authorities and relevant stakeholders, review of specialist reports and the compilation and review of the Amendment Report.



Franci Gresse Senior Environmental Impact Assessment Practitioner

Table Mountain Group (TMG) Aquifer feasibility study and pilot project, Western Cape Province, South Africa, City of Cape Town, 2015 - date, Environmental Consultant

The TMG Aquifer Feasibility Study and Pilot Project was initiated in 2002 and is a long term planning initiative to investigate the groundwater potential of the TMG Aquifer as a water source to augment Cape Town's water supply. Given the recommendations in the Exploratory Phase report, and the fact that the TMG Aquifer has since been utilised as a water resource in areas such as Hermanus and Oudtshoorn, the City of Cape Town decided to omit the Pilot Phase and rather proceed with an extended Exploratory Phase, which would include limited pump testing. Aurecon was appointed to undertake the extended Exploratory Phase work. Responsibilities include the compilation of Environmental Management Plans for the additional test sites, liaison with the relevant authorities and landowners and management of the Environmental Control Officers on the project.

Implementation of the Hoekplaas environmental authorisation (EA), Northern Cape Province, South Africa, Mulilo Renewable Energy, 11/2013 - 05/2015, Project Leader

Aurecon assisted the holder of the environmental authorisation (EA) for the 100 MW photovoltaic (PV) facility in De Aar with the implementation of the environmental conditions to ensure compliance to all relevant environmental legislation. Responsible for the management of tasks and review of all documentation. Also assisting client with questions on the environmental impact assessment (EIA) process.

Environmental impact assessment and compilation of an environmental management plan (EMP) for the Swakopmund-Mile 7 Water Supply, Phase 2, Swakopmund, Namibia, NamWater, 11/2013 - 10/2015, Project Leader

NamWater appointed Aurecon to assist with the environmental impact assessment process for the proposed construction of a new bulk water pipeline between Swakopmund and Mile 7. Responsible for the management and review of the environmental impact assessment (EIA) reports and processes, as well as the project's finances.

Working for Wetlands plan 2014 - 2016, Regional South Africa, South African National Biodiversity Institute (SANBI), 06/2013 – 05/2016, Task Leader

The South African National Biodiversity Institute (SANBI) appointed Aurecon to provide environmental and engineering services for the Working for Wetlands Programme which is a national wetland rehabilitation programme. Responsible for the management of the environmental authorisation component of the project, as well as the compilation of basic assessment reports (BAR) for the country. Other responsibilities include the compilation of wetland rehabilitation plans for the Western Cape, Northern Cape, North West and Limpopo Provinces, liaison with authorities and the public (public participation process) and management of wetland specialists.



Franci Gresse Senior Environmental Impact Assessment Practitioner

Maintenance management plans (MMP's) for flood damaged road infrastructure, Western Cape Province, South Africa, Western Cape Provincial Government Department of Transport and Public Works, 06/2013 - Date, Project Staff

The project entails the compilation of maintenance management plans (MMP's) for two local municipal areas (Laingsburg and Worcester), as well as obtaining the necessary permits/ water use authorisations. Personally involved during the project commencement with regards to strategy development, meetings with the relevant authorities and assistance with the development of the MMP's.

Environmental impact assessment (EIA) for the expansion of approved solar energy facilities located near Prieska and De Aar, Northern Cape Province, South Africa, Mulilo Renewable Energy, 03/2013 - 09/2015, Phase Leader

Mulilo Renewable Energy decided to expand the approved solar energy facilities on the farms Hoekplaas and Klipgats in Prieska, as well as on the farms Badenhorst Dam and Du Plessis Dam in De Aar. The expansion of Hoekplaas farm in Prieska includes ten additional 75 MW photovoltaic (PV) facilities and six additional PV units at Klipgats Pan farm. The expansion at Badenhorst Dam farm includes four additional 75 MW PV facilities and three additional PV units at Du Plessis Dam farm. Responsible for the management and review of the environmental impact assessment (EIA) reports and processes, as well as the project's finances.

Fatal flaw study for two potential Wind Energy Facility (WEF) sites, Northern and Western Cape Provinces, South Africa, Juwi Renewable Energies (Pty) Ltd, 03/2013 - 04/2013, Environmental Practitioner

The study entailed a fatal flaw analysis of two potential wind energy facility (WEF) sites in the Northern and Western Cape Provinces. Responsible for the assessment of the sites and compilation of the fatal flaw report.

Richtersveld wind energy facility (WEF), Northern Cape Province, South Africa, TRE Tozzi Renewable Energy S.p.A and Guma Group, 07/2012 - 09/2013, Environmental Practitioner

The project entailed a due diligence of the proposed wind energy facility (WEF) to review compliance with the requirements of the Department of Energy's independent power producer (IPP) process. Responsible for the review of the environmental reports and compilation of the due diligence report.

Three photovoltaic (PV) energy facilities near Copperton, Northern Cape Province, South Africa, Mulilo Renewable Energy (MRE), 09/2011 - 05/2015, Environmental Practitioner

The project entailed three environmental impact assessments (EIA's) for three photovoltaic (PV) energy facilities comprising 75 MW to 150 MW, located near Copperton. Responsible for the management the EIA process and project specialists, compilation of scoping and EIA reports and liaison with authorities.

Fatal flaw study for four potential wind energy facility (WEF) sites, Northern and Western Cape Provinces, South Africa, Mainstream Renewable Power South Africa, 11/2011 - 05/2012, Environmental Practitioner

The study entailed a fatal flaw analysis of four potential wind energy facility (WEF) sites across the Northern and Western Cape Provinces. Responsible for the management of specialists, review of reports, assessment of the sites and compilation of the fatal flaw report.



Franci Gresse Senior Environmental Impact Assessment Practitioner

Implementation of the Klipgats Pan environmental authorisation (EA), Northern Cape Province, South Africa, Mulilo Renewable Energy, 09/2011 - 05/2015, Project Leader

Aurecon was appointed to undertake three environmental impact assessments (EIA's) for three proposed photovoltaic (PV) solar energy plants near Copperton. The first PV solar energy plant will generate around 100 MW (preferred alternative) or 150 MW (alternative) on the Hoekplaas Farm (Farm 146/RE). The proposed PV plant will cover approximately 300 ha (preferred alternative) or 450 ha (alternative). The second includes a PV solar energy plant to generate roughly 100 MW on the farm Klipgats Pan (Farm 117/4) near Copperton in the Northern Cape. The proposed PV plant will cover an estimated 300 ha. An alternative site for a 100 MW PV plant with a 300 ha footprint is also being considered. The third comprises a PV solar energy plant to generate about 100 MW (preferred alternative) or 300 MW (alternative) on the farm Struisbult (Farm 104, portion 1) which will cover 300 ha to 900 ha. Responsible for managing tasks and reviewing all documentation for updating the environmental management plan (EMP) and implementing the environmental authorisation (EA). Also assisted client with questions on the EIA process.

Proposed rehabilitation of Wetlands as part of the Working for Wetlands, Regional, South Africa, South African National Biodiversity Institute (SANBI), 08/2011 - 09/2013, Environmental Practitioner

Appointed by the South African National Biodiversity Institute (SANBI) to conduct environmental impact assessments (EIA's) for the rehabilitation of specific wetlands in all provinces of South Africa over a five year period. Responsible for the compilation of basic assessment reports (BAR) and Wetland Rehabilitation Plans for the Western Cape, Northern Cape, Gauteng and Limpopo Provinces. Other responsibilities included liaison with authorities, public participation process, management of specialists and general project management of the environmental component of the project.

Repair of flood damage to road structures in the Eden District Municipality, Western Cape Province, South Africa, Western Cape Provincial Department of Transport and Public Works, 01/2011 - Date, Environmental Practitioner

The project entails the compilation of maintenance management plans (MMP) for seven areas within the Eden District Management Area to repair. Responsible for compilation of MMP's, review of reports and liaison with stakeholders and authorities.

Environmental impact assessment (EIA) for the proposed extension of the Ash Dam facility at Kriel power station, Mpumalanga Province, South Africa, Eskom Holdings, 11/2009 - 12/2015, Environmental Practitioner

Appointed by Eskom to conduct an environmental impact assessment (EIA) for the proposed construction of a fourth ash dam facility at the Kriel power station. Responsible for the general project management and finances, screening process, compilation of the scoping and EIA reports, public participation and the compilation of a waste management licence application.



Franci Gresse Senior Environmental Impact Assessment Practitioner

Environmental impact assessment (EIA) for proposed relocation of solar energy facility, Onder Rietvlei Farm, Aurora, Western Cape Province, South Africa, Solaire Direct Southern Africa, 2010 - 2011, Project Leader

Appointed by Solaire Direct to undertake a basic environmental impact assessment (EIA) process for the proposed relocation of an approved, but not yet constructed 10 MW solar energy facility. Responsible for the management and review of the EIA process and finances.

Environmental impact assessment (EIA) for proposed solar energy facility, Onder Rietvlei Farm, Western Cape Province, South Africa, Solaire Direct Southern Africa, 07/2010 - 02/2012, Environmental Practitioner

Appointed by Solaire Direct to undertake a basic environmental impact assessment process for the proposed construction of a 10 MW solar energy facility. Responsible for the compilation of the draft and final reports, public participation process, management of specialists and general project management.

Proposed Paarl Mountain and Ysterbrug pumping main upgrades, Western Cape Province, South Africa, Drakenstein Municipality, 06/2010 – 12/2015, Environmental Advisor

The Drakenstein Municipality appointed Aurecon's engineers to investigate and plan the proposed upgrade of the Paarl Mountain and Ysterbrug Pumping Scheme. The upgrading of the pipelines feeding the Meulwater Water Treatment Works from the Bethel and Nantes dams, also part of this scheme, was also investigated. Responsible for providing advice on environmental processes required. Other responsibilities included the management of the independent environmental assessment practitioner and the review of all environmental impact assessment (EIA) documentation.

Environmental sensitivity study (ESS) for a proposed solar energy facility on a farm Near Aurora, Western Cape Province, South Africa, Solaire Direct Southern Africa, 2010, Environmental Practitioner

Appointed to provide an environmental sensitivity study (ESS) which inter alia highlights the potential constraints ('red flags') and opportunities presented by the site from an environmental perspective. Responsible for the compilation of the ESS.

Proposed remediation, rehabilitation and restoration of the Spruit, Krom, Leeu and Palmiet Rivers, Western Cape Province, South Africa, Drakenstein Municipality, 2009 - 2010, Environmental Practitioner

Appointed by the Drakenstein Municipality to undertake the requisite environmental impact assessment (EIA) process for the rehabilitation, remediation and stabilisation of four rivers in Paarl and Wellington. Responsible for the EIA and public participation processes.

Proposed construction of a new pipeline from Bovlei Winer to Withoogte Dam, Wellington, Western Cape Province, South Africa, Drakenstein Municipality, 2009 - 2010, Environmental Practitioner

The Drakenstein Municipality proposed to replace a section of the existing pipeline extending from the Withoogte Dam to the Welvanpas Reservoir near Wellington as part of the municipality's water master plan in order to improve the overall water supply. Responsible for the compilation of the environmental impact assessment (EIA) report, management of specialists and the public participation process.



Franci Gresse Senior Environmental Impact Assessment Practitioner

Proposed erection of Eskom communication sirens and public announcement (PA) systems, Blaauwberg, Western Cape Province, South Africa, Eskom, 2009 - 2010, Environmental Practitioner

The project entailed three environmental impact assessment (EIA) processes for the (a) erection of 10 new sirens in the Parklands area, (b) the relocation of one siren in Bloubergstrand, and (c) the upgrade of five sirens on farms near Melkbosstrand. Responsible for compiling environmental impact assessment (EIA) reports, and the public participation process.

Overberg District Municipality integrated transport plan (ITP) strategic environmental informants, Western Cape Province, South Africa, Overberg District Municipality, 2009, Environmental Practitioner

Aurecon's Transportation Unit was appointed to revise the integrated transport plan (ITP). The Environmental Unit was subcontracted to provide environmental input. Responsible for identifying and describing the relevant informants.

Annandale Commercial: development of petrol filling station on portion of Erf 5561, Kuils River, Western Cape Province, South Africa, Communicate, 2009, Environmental Practitioner

Appointed to compile a construction environmental management plan (CEMP) for the construction of a filling station on the corner of Gladioli Street and Amandel Drive, Kuils River. Responsible for the compilation of the project specification document as part of the CEMP.

Environmental impact assessment (EIA) for the proposed Langezandt Quays development in Struisbaai Harbour, Western Cape Province, South Africa, Golden Falls (Pty) Ltd, 2008 - Date, Environmental Practitioner

Aurecon was appointed to undertake an environmental impact assessment (EIA) process for the proposed development of a four storey development on Erf 848 within the Struisbaai harbour precinct. Responsible for drafting responses to the Department of Environmental Affairs' independent review report on the proposed development.

Pre-feasibility and feasibility studies for augmenting the Western Cape water supply system, South Africa, Department of Water Affairs (DWA), 2008 - 2013, Project Staff

The Department of Water Affairs commissioned pre-feasibility and feasibility studies for the augmentation of the Western Cape water supply system through the further development of the surface water resources. Surface water schemes to be investigated were identified by the Western Cape water supply system reconciliation strategy study. Responsible for the public participation process, managing environmental specialists, and compiling a socio-economic overview of the study area.

Proposed redevelopment of the Blaauwberg Conservation Area: Eersteste Node, Western Cape Province, South Africa, City of Cape Town, 2008 - 2010, Environmental Practitioner

The project entailed an environmental impact assessment (EIA) process for redeveloping the Eersteste Conservation Area on the West Coast. Responsible for compiling the EIA report, as well as managing specialists and the public participation process.



Franci Gresse Senior Environmental Impact Assessment Practitioner

Table Mountain Group aquifer feasibility study and pilot project, Western Cape Province, South Africa, City of Cape Town, 2008 - 2010, Environmental Control Officer

The City of Cape Town initiated a study into the Table Mountain Group Aquifer as a potential water source to augment the city's supply. The feasibility and pilot project phase record of decision (RoD) required completion for site-specific environmental management plans (EMP's) for drilling sites that were assessed to be environmentally sensitive. Site-specific EMP's were designed for sensitive sites to ensure minimal environmental impact during the drilling phase. Responsible for monitoring compliance with the RoD and EMP during the drilling phase.

Water reconciliation strategy for the Algoa water supply area, Eastern Cape Province, South Africa, 2008 - 2009, Environmental Practitioner

This project provided an assessment of the environmental opportunities and constraints for a suite of water schemes in the Algoa water supply area. This was undertaken as part of a broader study in the area.

Application for rectification in terms of Section 24G of the National Environmental Management Act (NEMA) for the unlawful commencement of a fruit processing factory on Op de Tradouw Farm, Number 69, Barrydale, Western Cape Province, South Africa, Schoonies Family Trust, 2008 - 2009, Environmental Practitioner

The project consisted of an application for rectification in terms of Section 24G of NEMA. Responsible for compiling an environmental impact report and an environmental management plan (EMP) for the application, as well as managing the public participation process.

Proposed development of apple and pear orchards on Soetmelksvlei Farm, Western Cape Province, South Africa, BETCO, 2008 - 2009, Project Staff

This Agri-development project involved the development of 50 ha of apple and pear orchards in the Riviersonderend region. Responsible for compiling the basic assessment report, environmental management plan (EMP), and managing the specialists and public participation process.

C.A.P.E. Olifants-Doring Catchment Management Agency project: Development of a catchment management strategy water resource protection sub-strategy for the Olifants-Doring Catchment, South Africa, CapeNature, 2008 - 2009, Environmental Practitioner

Appointed by CapeNature to compile a catchment management strategy water resource protection sub-strategy for the Olifants-Doorn catchment. Responsible for compiling a database that lists all institutions and their respective mandates in terms of water resource protection and biodiversity conservation decision making for the Olifants-Doring Catchment, workshop arrangements, and general project related work.

Environmental sensitivity study for the proposed Dasdrif poultry farm in Moorreesburg, Western Cape Province, South Africa, Eikenhoff Poultry Farms (Pty) Ltd, 2008, Project Staff

The project consisted of an environmental sensitivity study (ESS) which, inter alia, highlighted the potential constraints ('red flags') and opportunities presented by the site from an environmental perspective. Responsible for compiling the ESS.



Margaret Lowies

Senior Environmental Scientist

Margaret is a senior environmental scientist currently based in Aurecon's Port Elizabeth office. She has over seven years of experience in environmental impact assessment (EIA) processes, water use licence applications, waste licence applications, environmental compliance auditing, mining permit applications, wetland assessments, due diligence assessments and water quality assessments. Most of these projects have been focussed at a municipal level within the various municipalities of the Eastern Cape, and her roles include both the technical work and overall project management. Her role as an environmental control officer (ECO) has also given her a very practical understanding of how projects of various scales are implemented.

She obtained a BSc degree in Geography and Environmental Management, a BSc in Geography (Hons) as well as an MSc degree in Geography from the University of Johannesburg, South Africa in 2008, 2010 and 2014 respectively. She is registered as an environmental assessment practitioner with the Environmental Assessment Practitioners Association of South Africa (EAPSA) and is a registered candidate natural scientist with the South African Council for Natural Scientific Professions (SACNASP). She is also member of the Institute of Waste Management of South Africa (IWMSA) and the South African affiliate of the International Association of Impact Assessment (IAIAsa).

Qualifications

MSc Geography
BSc (Geography and Environmental Management)
BSc Geography (Hons)
Environmental Assessment Practitioner, Interim Certification Board of Environmental Assessment Practitioners of South Africa
Candidate Natural Scientist, South African Council for Natural Scientific Professions (SACNASP)
Member, International Association for Impact Assessment (IAIAsa), South Africa
Member, Institute of Waste Management of Southern Africa (IWMSA)

Specialisation

Environmental Specialist

Years in industry

7

Languages

Afrikaans
English

Experience

Training & Capacity Building

Working for Wetlands ECO training, South Africa,

Having worked on the planning cycles of the Working for Wetlands Programme for many years, Margaret provided training on the importance of implementing the appropriate mitigation measures during wetland rehabilitation. This was guided by her experience as an Environmental Control Officer.

Environmental Control Officer

Construction of Zone 7 municipal infrastructure to service the TNPA Tank Farm, Eastern Cape Province, South Africa, Coega Development Corporation (CDC), 10/2007 - 12/2025, Environmental Control Officer

The project involved the construction of roads, a stormwater detention pond and the installation of various services. Responsible for ensuring compliance with environmental assessment and CDC standard environmental specifications.

Dordrecht water and sanitation services upgrade, Eastern Cape Province, South Africa, Chris Hani District Municipality, 10/2015 - 12/2017, Environmental Control Officer

This project is divided into four future projects, which includes the construction of new sewage treatment facilities; the construction of new reticulation in Dordrecht; immediate water supply upgrades and long-term bulk water supply upgrades. Responsible for report review.



Margaret Lowies Senior Environmental Scientist

Northern outfall sewers, Mthatha, Eastern Cape Province, South Africa, Amatola Water - Amanzi, 06/2013 - 12/2017, Environmental Control Officer

The project entailed consulting engineering, social facilitation and environmental services for the construction of the outfall sewers along the banks of the Mthatha River. This involved the installation of 1 200 mm diameter sewer pipes, crossing the river above ground and below the river bed level. The sewage will discharge into a 17 m-deep pump station, from where it will be pumped into the head of the existing wastewater treatment works (WWTW). The project also entailed the application for a water use licence application (WULA). Responsible for management of environmental site officer, report writing and WULA report/application review.

Construction of Graaff-Reinet solid waste site, Eastern Cape Province, South Africa, Camdeboo Local Municipality, 12/2010 - 12/2016, Environmental Control Officer

The project comprised the construction of a new solid waste site outside Graaff-Reinet. Responsible for monitoring compliance with the environmental management plan (EMP) and record of decision (ROD).

Construction environmental management plan (EMP) for Ugie particle board plant, Eastern Cape Province, South Africa, PG Bison, 08/2006 - 08/2016, Environmental Control Officer

The project entailed a construction environmental management plan (EMP), operation environmental management plan (OEMP), atmospheric emissions license (AEL) reviews and ongoing monitoring for the Ugie particle board plant. Responsible for operational compliance auditing.

Sidwadweni Bulk Regional Water Supply Scheme, Eastern Cape Province, South Africa, Amatola Water - Amanzi, 09/2012 - 07/2016, Environmental Control Officer

The project included the construction of river abstraction, raw water reservoir, water treatment works (WTW), clear water pump station and bulk supply mains for the Sidwadweni Bulk Regional Water Supply Scheme. Responsible for report review.

Idutywa East Water Supply Scheme (WSS), Eastern Cape Province, South Africa, Amathole District Municipality (ADM), 05/2006 - 12/2015, Environmental Control Officer

Aurecon undertook the design and construction of the Idutywa East Water Supply Scheme (WSS) in the Eastern Cape Province. Responsible for ensuring environmental compliance and report review.

Khayamnandi housing development project, Eastern Cape Province, South Africa, Nelson Mandela Bay Metropolitan Municipality (NMBMM), 02/2011 - 01/2015, Environmental Control Officer

The project entailed environmental services for the development of Khayamnandi extension on erven 114, 609, 590 and 24337, Bethelsdorp, including the construction of 7 960 residential stands, business stands and community facilities and supporting infrastructure. Responsible for overall environmental monitoring and inputs as well as compilation/review of monthly audit reports.



Margaret Lowies Senior Environmental Scientist

Cookhouse Wind Farm project, Eastern Cape Province, African Clean Energy Developments (ACED), 12/2012 - 12/2014, Environmental Control Officer

Aurecon was appointed as owner's engineer for the construction of a 140 MW wind farm in the Eastern Cape Province of South Africa. The scope of services included design review, site supervision, environmental monitoring, health and safety monitoring and witnessing of commissioning and testing. The Cookhouse Wind Farm Stage 1 comprise 66 x Suzlon S88 2.1 MW wind turbines, associated roads and foundations, electrical reticulation, substation, supervisory control and data acquisition (SCADA) system as well as a 132 kV overhead line (OHL) to the Poseidon substation. The scope of owner's engineer services has been structured to align with the role and obligations of the owner's engineer defined in the draft engineering, procurement and construction (EPC) agreement for the project. Responsible for overseeing environmental compliance of the project including updating of the environmental management plan (EMP), approval of method statements, environmental authorisation and layout amendments, bi-weekly audits with a monthly environmental assessment (EA) and EMP compliance report.

Advisory

Reconciliation strategy for Algoa Water Supply System (WSS), Eastern Cape Province, South Africa, Department of Water and Sanitation, 04/2016 - 03/2019, Environmental Specialist - Advisory

The project objectives are to put arrangements and resources in place for the ongoing implementation of the recommendations and maintenance of the Algoa Reconciliation Strategy; to evaluate the efficiency of the Orange-Fish-River Project and to remove potential operating system constraints for the sustainable delivery of the Orange River bulk water supply to the Lower Sundays River Government Water Scheme (LSRGWS) and to Nelson Mandela Bay Municipality (NMBM) for water requirements up to 2040. In order to evaluate the efficiency of the Orange River Project Aurecon will estimate water use efficiency; determine catchment yields of the Fish and Sundays catchments; give recommendations for the phasing-out of current gratis allocations; identify potential water savings and provide options for re-allocation as well as confirm an official allocation from the Teebus Tunnel to the Orange-Fish System (OFS) in the Eastern Cape. While the focus is on providing additional balancing storage in addition to the Scheepersvlakte Balancing Dam, the provision of storage at other potential locations in the bulk transfer infrastructure must also be considered. Responsible for ad hoc advisory relating to environmental legislation compliance and general environmental matters.

Public Servant Association Social and Labour Plan (SLP), Eastern Cape Province, South Africa, Public Servant Association, 12/2010 - 02/2011, Environmental Assessment Practitioner

The Social and Labour Plan (SLP) was done in order to obtain a mining right conversion for the Department of Mineral Resources (DMR) for the Gonubie Sand Mine. Responsible for compilation of SLP and communication with DMR.



Margaret Lowies Senior Environmental Scientist

Integrated Environmental Permitting (EIAs, EMPs and MMPs)

Working for Wetlands Programme, Department of Environmental Affairs, 06/2011 - 04/2018, Environmental Assessment Practitioner - Coordinator of the Mpumalanga and Eastern Cape Provincial teams

Aurecon was appointed in 2011, 2013 and then again in 2016 for a three-year cycle for the design, planning, environmental, project and risk management of the Working for Wetlands programme. The programme's objective is to rehabilitate damaged wetlands throughout South Africa, with an emphasis on complying with the principles of the Expanded Public Works Programme (EPWP) through employing only local small, medium and micro enterprises (SMMEs). Involvement included site work, a rehabilitation plan and basic assessment report to enable the rehabilitation of various wetlands within the Mpumalanga and Eastern Cape provinces. Responsible for coordination of provincial team (wetland specialist, engineer and DEA Assistant Director) and report writing.

Motherwell North Bulk Sewer, Eastern Cape Province, South Africa, Nelson Mandela Bay Metropolitan Municipality (NMBMM), 12/2015 - 10/2017, Project Leader/Environmental Assessment Practitioner

Aurecon was appointed to undertake environmental authorisations for the Motherwell North Bulk Sewer project. This included environmental impact assessment (EIA), heritage, water use licenses (WUL) and specialist studies for the 1.5 m diameter collector sewer of 10 km. Responsible for project management and review of report.

Misgund augmentation bulk water supply, Eastern Cape Province, South Africa, Amatola Water - Amanzi, 01/2014 - 06/2017, Environmental Assessment Practitioner/Specialist

The project entailed a study to determine the technical feasibility of bulk water supply in Misgund as per the Department of Water Affairs (DWA) guidelines for Regional Bulk Infrastructure Grant (RBIG) projects. Responsible for environmental impact assessment (EIA) process, water use licence application (WULA) and wetland assessment.

Upgrading and permitting of the Klipplaat landfill site, Eastern Cape Province, South Africa, Ikwezi Local Municipality, 10/2011 - 06/2016, Environmental Assessment Practitioner

The project involved the upgrading and permitting of the existing Klipplaat landfill site. This includes a scoping-environmental impact assessment (EIA) process as well as waste licence application process. Responsible for managing the EIA process, including public participation and report writing and review.

Bende water supply scheme, Eastern Cape Province, South Africa, Amathole District Municipality, 05/2014 - 02/2015, Environmental Assessment Practitioner

Aurecon was appointed for the environmental management for the proposed implementation of two rural water supply schemes at Bende and Shixini in the Eastern Cape Province. Responsible for report review, appointment of specialists and management of environmental impact assessment (EIA) process.

Upgrading of National Route 61 Section 6 (R61/6) from All Saints (Km 68.5) to Section 7 - Baziya (Km 12), between Baziya and Queenstown, Eastern Cape Province, South Africa, South African National Roads Agency Limited



Margaret Lowies Senior Environmental Scientist

(SANRAL), 04/2012 - 12/2014, Environmental Assessment Practitioner/Environmental Specialist

Aurecon was appointed by Jeffares & Green (J&G), on behalf of the South African National Roads Agency Limited (SANRAL), to undertake an all environmental authorisation and public participation process (PPP) for the proposed road upgrade of National Route R61. The project involved the upgrading of a 36 km stretch of road as well as replacing five bridges. Responsible for project management, report writing and water quality specialist report.

Social impact assessment (SIA) for augmentation of the Driftsands collector sewer, Eastern Cape Province, South Africa, Nelson Mandela Bay Metropolitan Municipality (NMBMM), 08/2011 - 10/2011, Environmental Assessment Practitioner

The project involved a survey of households in the Walmer Township that are impacted by the augmentation of the Driftsands sewer collector. Responsible for coordination of survey, capturing of data and report writing.

Other Environmental Permitting/ Management Projects

- Churchill water treatment works (WTW), Eastern Cape Province, 03/2007 – 12/2020, Environmental Assessment Practitioner
- Upgrade of Brickfields pre-treatment works in Nelson Mandela Bay Metropolitan Municipality, 12/2010 – 07/2020, Environmental Assessment Practitioner
- Sewer maintenance backlog study for the Nelson Mandela Bay Metropolitan Municipality, Eastern Cape Province, South Africa, Nelson Mandela Bay Metropolitan Municipality (NMBMM), 10/2004 - 07/2020, Environmental Assessment Practitioner
- Environmental impact assessment for pipe upgrade of Eastbury Drive Sewer, KwaZulu-Natal Province, South Africa, eThekweni Municipality, 06/2016 - 05/2019, Environmental Assessment Practitioner
- Environmental services for upgrading of R75, Eastern Cape Province, South Africa, South African National Roads Agency Limited (SANRAL), 02/2015 - 02/2018, Project Leader/Environmental Assessment Practitioner
- Woodchem water use licence, Mpumalanga Province, South Africa, KAP Diversified Industrial (Pty) Ltd, 04/2016 - 07/2017, Environmental Specialist
- Environmental impact assessment (EIA) for Coega wastewater treatment works (WWTW), Eastern Cape Province, South Africa, Nelson Mandela Bay Metropolitan Municipality (NMBMM), 12/2014 - 05/2017, Project Leader/Environmental Assessment Practitioner
- Water use licence application (WULA) and wetland assessment for Grassridge to Melkhout 132 kV line, Eastern Cape Province, South Africa, Eskom SOC Ltd, 11/2014 - 12/2015, Environmental Specialist/Project Leader
- Proposed construction of the Ingquza Hill Museum - basic assessment, Eastern Cape Province, South Africa, National Department of Arts and Culture, 08/2013 - 10/2013, Environmental Assessment Practitioner