

Application for Environmental Authorization for the
Proposed Extensions to River Lodge and WWTW upgrades in Kapama Private
Game Reserve, Limpopo Province

DRAFT ENVIRONMENTAL MANAGEMENT PROGRAMME (EMPr)

Compiled by:



NULEAF PLANNING AND ENVIRONMENTAL PTY LTD

On behalf of:

Kapama Private Game Reserve

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ACRONYMS AND ABBREVIATIONS

BA:	Basic Assessment
BAR:	Basic Assessment Report
CDF:	Conservation Development Framework
CMP:	Construction Management Plan
DEA:	South African National Department of Environmental Affairs
DWS:	South African National Department of Water and Sanitation
EA:	Environmental Authorisation
ECO:	Environmental Control Officer
EIA:	Environmental Impact Assessment
EMPr:	Environmental Management Programme
EMS:	Environmental Management System
EO:	Environmental Officer
I&AP:	Interested and Affected Party
IEM:	Integrated Environmental Management
LED:	Local Economic Development
NCR:	Non-conformance Report
NEMA:	National Environmental Management Act, Act No. 107 of 1998
NEMPAA:	National Environmental Management: Protected Areas Act, Act No. 57 of 2003
OMP:	Operational Management Plan
SAHRA:	South African Heritage Resources Agency
WHO:	World Health Organisation

GLOSSARY OF TERMS

Alien Vegetation:	Alien vegetation defined as undesirable plant growth which shall include, but not be limited to all declared category 1 and 2 listed invader species as set out in the Conservation of Agricultural Resources Act (CARA) regulations.
Alien Species:	A plant or animal species introduced from elsewhere: neither endemic nor indigenous.
Alternatives:	<p>In relation to a proposed activity, means different means of meeting the general purpose and requirements of the activity, which may include alternatives to:</p> <ul style="list-style-type: none">(a) The property on which or location where it is proposed to undertake the activity;(b) The type of activity to be undertaken;(c) The design or layout of activity;(d) The technology to be used in the activity; and(e) The operational aspects of the activity.
Applicant:	Any person who applies for an authorization to undertake an activity or to cause such activity to be undertaken as contemplated in the National Environmental Management Act (Act No. 107 of 1998), as amended and the Environmental Impact Assessment Regulations, 20010.
Buffer zone:	Is a collar of land that filters out inappropriate influences from surrounding activities, also known as edge effects, including the effects of invasive plant and animal species, physical damage and soil compaction caused by trampling and harvesting, abiotic habitat alterations and pollution. Buffer zones can also provide more landscape needed for ecological processes, such as fire.
Construction Activity:	Any action taken by the Contractor, his subcontractors, suppliers or personnel during the construction process.
Construction Camp:	is the area designated for key construction infrastructure and services, including but not limited to offices, overnight vehicle parking areas, stores, the workshop, stockpile and lay down areas, hazardous storage areas (including fuels), the batching plant (if one is located at the construction camp), designated access routes, equipment cleaning areas and the placement of staff accommodation, cooking and ablution facilities, waste and wastewater management;
Ecology:	The study of the inter relationships between organisms and their environments.
Environment:	All physical, chemical and biological factors and conditions that influence an object and/or organism.
Environmental Impact:	An Impact or Environmental Impact is the degree of change to the environment, whether desirable or undesirable, that will result from the effect of a defined activity. An Impact may be the direct or indirect consequence of an activity and may be simple or cumulative in nature.

Environmental Impact Assessment:	Assessment of the effects of a development on the environment.
Environmental Management Programme:	A legally binding working document, which stipulates environmental and socio-economic mitigation measures that must be implemented by several responsible parties throughout the duration of the proposed project.
Indigenous:	Means a species that occurs, or has historically occurred, naturally in a free state within the borders of South Africa. Species that have been introduced to South Africa as a result of human activity are excluded (South Africa (Republic) National Environmental Management: Biodiversity Act, 2004: Chapter 1).
Interested and Affected Party:	Any person, group of persons or organization interested in or affected by an activity contemplated in an application, or any organ of state that may have jurisdiction over any aspect of the activity.
Invasive vegetation:	Plant species that show the potential to occupy in unnatural numbers, any disturbed area, including pioneer species.
Public Participation:	The legislated process contemplated in terms GN R543, in which all potential interested and affected parties are informed of the proposed project and afforded the opportunity to input, comment and object. Specific requirements are listed in terms of advertising and making draft reports available for comment.
Road Reserve:	The road reserve is a corridor of land, defined by co-ordinates and proclamation, within which the road, including access intersections or interchanges, is situated. A road reserve may, or may not, be bounded by a fence.
Road Width:	The area within the Road Reserve including all areas beyond the Road Reserve that are affected by the continuous presence of the road i.e. the verge.
Mitigate:	The implementation of practical measures to reduce adverse impacts Public Participation Process: is a process in which potential interested and affected parties are given an opportunity to comment on, or raise issues relevant to, specific matters.
Non-conformance Report:	A Non-Conformance Report is a construction related document issued to the Contractor as a final step towards rectifying a failure in complying with a requirement of the EMPr.
Red data plant species:	Are fauna and flora species that require environmental protection based on the World Conservation Union (IUCN) categories and criteria.
ROD:	Record of Decision pertaining to the Application for Environmental Authorisation issued by the Competent Authority. The RoD is legally binding on the Applicant and may contain a positive or negative decision on the Application as well as conditions and provisions for each.

Soil Compaction:	Mechanically increasing the density of the soil, vehicle passage or any other type of loading. Wet soils compact easier than moist or dry soils.
Species:	Means a kind of animal, plant or other organism that does not normally interbreed with individuals of another kind. The term "species" include any sub-species, cultivar, variety, geographic race, strain, and hybrid or geographically separate population (South Africa [Republic] National Environmental Management: Biodiversity Act, 2004: Chapter 1).
The Contractor:	The contractor, as the developers agent on site, is bound by the ROD and EMP conditions through his/her contract with the developer, and is responsible for ensuring that conditions of the EMP and ROD are strictly adhered to at all times. The contractor must comply with all orders (whether verbal or written) given by the ECO, project manager or site agent in terms of the EMPr.
The Developer:	Remains ultimately responsible for ensuring that the development is implemented according to the requirements of the EMP and the conditions of the Environmental Decision throughout all phases of the project.
The Environmental Control Officer (ECO):	The ECO is appointed by the developer as an independent monitor of the implementation of the EMP i.e. independent of the developer and contractor.
The Environmental Officer (EO):	The Contractor shall submit to the Site Agent a nominated representative of the Contractor as an EO to assist with day to day monitoring of the construction activities for the contract.
Vegetation:	Is a collective word for plants occurring in an area.
Vulnerable:	A taxon is 'Vulnerable' when it is not 'Critically Endangered' or 'Endangered' but is facing a high risk of extinction in the wild in the medium term future.
Watercourse:	A river or spring; a natural channel in which water flows regularly or intermittently; a wetland, lake or dam into which, or from which, water flows; and any collection of water which the Minister may by notice in the Government Gazette, declare to be a watercourse, and a reference to a watercourse includes, where relevant, its bed and banks" (South Africa [Republic] National Water Act, 1998).

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APPENDICES

Appendix A: Curriculum Vitae of the Environmental Assessment Practitioner

SECTION A: GENERAL

1. INTRODUCTION

A key requirement of the National Environmental Management Act (NEMA) of 1998 is compliance with the principles of Integrated Environmental Management (IEM). Chapter Five of NEMA deals with IEM and its objective to promote the application of appropriate environmental management tools in order to ensure the integrated environmental management of activities.

Among these tools are Environmental Impact Assessments (EIAs) and Environmental Management Programmes (EMPr's). In compliance with the above mentioned environmental legislation, the Department of Environmental Affairs (DEA) requires that the Applicant undertake a Basic Assessment (BA) for the proposed development, and that the Basic Assessment Report (BAR) includes a detailed EMPr.

The EMPr typically becomes part of the Environmental Authorization (EA) prepared by the relevant environmental authority and becomes the basis for monitoring compliance with the recommendations of the EIA both during the Construction and Operational Phases.

The Environmental Management Programme (EMPr) addresses the construction and operational phases of the project. It serves as a stand-alone document to be disseminated to and used by the contractor, lodge manager and others involved in the construction and/or operational phases of the development.

It should be noted that the guidelines listed hereunder are not to be considered finite. Experience has shown that additional environmental issues are bound to arise as the project unfolds. When this happens, the Environmental Management Programme (EMPr) must be updated accordingly.

The Environmental Management Programme will ensure that the environmental commitments sketched as mitigation measures in the BA are adhered to. In addition, the EMPr can be used to evaluate the effectiveness of mitigation measures.

2. DETAILS AND EXPERTISE OF EAP

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Expertise	Environmental Practitioner

Please refer to Appendix A for EAP curriculum vitae.

3. BACKGROUND

The properties affected are: the Remaining extent of the farm Hoedspruit 82 KU (River Lodge), Portion 228 of the farm Guernsey 81 KU (Karula), Remaining extent of Portion 4 of the farm Moria 83 KU (Buffalo Camp), Portion 213 (ptn of Ptn 194) of the Farm Guernsey 81KU (Southern Camp), Remaining extent of the farm Hoedspruit 82 KU (Staff Village) and are situated within Kapama Private Game Reserve in Maruleng Local Municipality, approximately 20 Km south of Hoedspruit.

The proposed development entails the expansion of River Lodge located within Kapama Private Game Reserve. The expansion will consist of the construction of a new dining room and approximately 20 tourism accommodation suites. All associated civil infrastructure (water, electricity and waste treatment) will be included. Additionally, new wastewater treat works will be constructed at the four lodges and staff village within Kapama Private Game Reserve.

4. ROLES AND RESPONSIBILITIES

4.1 Parties responsibilities

Party	Responsibility
Applicant	<ul style="list-style-type: none"> • Ensure adherence to, and compliance with, the EMPr in a legal and timely manner. This relates to all phases of the project lifecycle. • Appoint an Independent Environmental Control Officer (ECO) during both Construction and Operation Phases. • Ensure that a monitoring programme is drafted and implemented to assess compliance with the EMPr during the construction phase. • Ensure that contractors and operators undertake to adhere to the provisions of the EMPr as part of their respective contracts. • Ensure that independent Environmental Audits, including a Post Construction Close-Out audit is undertaken. The results of all audits must be forwarded to the Environmental Authority within 30 days after completion of the audit. • Ensure that all monitoring and audit reports are submitted to the Environmental Authority and that the contractor and operator implement recommendations. • Ensure that the EMPr is included as part of the tender documentation and / or included within any service level agreements made, thereby making it part of the enquiry document to make the recommendations & constraints as set out in this document, enforceable under the general conditions of contract.
Contractor	<ul style="list-style-type: none"> • Development of an Environmental Method Statement to be submitted and approved by the ECO. See point 4.2 below for more information. • Ensure adherence to, and compliance with, the Construction EMPr in a legal and timely manner. • Ensure that all staff members, sub-contractors and suppliers have a comprehensive understanding of the EMPr and adhere to the provisions for the duration of the construction phase. • Designate a permanent Environmental Officer (EO) to monitor environmental compliance on a day-to-day basis on the construction site. • Ensure that all staff members, sub-contractors and suppliers are aware of the environmental issues relating to the construction activities that they are undertaking on site and of all mitigating and precautionary measures that must be implemented. • Ensure that training is undertaken for construction supervisors and crews to recognise environmental 'red flags' and ensure that these will: <ul style="list-style-type: none"> ○ not be disturbed, damaged or removed and ○ Be brought to the immediate attention of the EO or ECO to determine an

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	<p align="center">action plan and way forward.</p> <ul style="list-style-type: none"> • Develop a layout of the operations of the construction site indicating the position of all construction activities, including but not limited to: offices, ablution facilities, storage areas, workshops, batching plant, stockpile areas, waste disposal facilities, hazardous substance storage area, access routes, etc. This layout plan is to be submitted to the ECO for acceptance prior to site establishment. Any changes to this plan will need to be reviewed in conjunction with the ECO. • Ensure that all recommendations made in monitoring and audit reports are implemented throughout the construction phase. • Accept liability for any and all Work required in terms of the environmental specifications, resulting from environmental negligence, mismanagement and / or non-compliance.
Operator	<ul style="list-style-type: none"> • Ensure adherence to, and compliance with, the Operational EMPr in a legal and timely manner. • Ensure that all staff members and suppliers have a comprehensive understanding of the EMPr and adhere to the provisions for the duration of the operational phase. • Designate an Environmental Officer (EO) to monitor environmental compliance on a day-to-day basis. • Ensure that all staff members and suppliers are aware of potential environmental issues and of all mitigating and precautionary measures that must be implemented. • Ensure that staff members and suppliers are able to recognise environmental 'red flags' and ensure that these will: <ul style="list-style-type: none"> ○ Not be disturbed, damaged or removed; and ○ Be brought to the immediate attention of the EO or ECO to determine an action plan and way forward. • Ensure that all recommendations made in monitoring and audit reports are implemented throughout the operational phase. • Accept liability for any and all Work required in terms of the environmental specifications, resulting from environmental negligence, mismanagement and / or non-compliance.
Environmental Officer (EO)	<ul style="list-style-type: none"> • Manage the day-to-day on-site implementation of the environmental specifications during the construction and operational phases, and provide support and input where required. • Compile regular (usually weekly) monitoring reports for submission to the contractor / operator, and copied to the ECO. • Act as liaison and advisor on all environmental and related issues, and seek advice from the ECO where required. • Understand the provisions and limitations of the project in terms of the EMPr and relevant regulations (such as NEMA and NEMWA) and provide advice accordingly. • Respond to incidents and keep records and reports as required.
Environmental Control Officer (ECO)	<ul style="list-style-type: none"> • Understand, interpret, monitor, audit and implement the EMPr from the "cradle to grave" stage. • Retain independence and report on environmental compliance in an objective manner. • Explain the contents of the EMPr to the Contractor, the site staff, supervisors, operators and any other relevant personnel or I&A's as required. • Undertake environmental audits for the duration of the construction and operational phases as required. • Act as quality controller regarding all environmental concerns by conducting periodic site inspections, attending regular site meetings, pre-empting problems, suggesting mitigation and being available to advice on incidental issues that arise. • Submit audit reports to the applicant, contractor / operator and the Environmental

	Authority, including performance rating, recommendations and reports of non-compliance.
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4.2 Contractors Environmental Method Statement

Method Statements are written submissions to the ECO by the Contractor in collaboration with the assigned EO, in response to a request by the ECO. The Method Statements should set out the plant, materials, labour and method that the contractor proposes using to carry out the intended construction activities. The Method Statement should contain the appropriate detail such that the ECO is able to assess whether the Contractor's proposal is in accordance with the requirements of this EMP. The contractor must sign the Method Statement along with the ECO to formalize the approved Method Statement.

The Method Statements must be submitted to the ECO for approval prior to the commencement of the any construction activity, including clearing. Any changes to the method of works must be reflected by amendments to the original approved Method Statement as is needed. Any changes in this regard must be approved by the ECO, understanding that such changes are environmentally acceptable and in line with the requirements of this EMP.

It is a statutory requirement to ensure the wellbeing of employees and the environment. To allow the mitigation measures in this document to be implemented, the Method Statement should briefly detail how and when a process will be carried out, the possible dangers/risks, and the methods of control required. This should be detailed for the following:

- Type of construction activity;
- Timing and location of the activity;
- Construction procedures for the following specific activities;
 - Bunding;
 - Blasting;
 - Construction site and office/yard establishment;
 - Cement mixing / concrete batching/bentonite mixing;
 - Contaminated water;
 - Dust management;
 - Environmental awareness course(s);
 - Environmental monitoring;
 - Erosion control;
 - Fire, hazardous and/or poisonous substances including their storage;
 - Personnel, public and animal safety;
 - Rehabilitation of modified environment(s);
 - Solid and liquid waste management;
 - Sources of materials (including MSDSs);
 - Top-soil management;
 - Storm water Management.
- Materials and equipment to be used;
- Transportation of the equipment to / from site;
- How equipment/material will be moved while on site;
- Location and extent of construction site office and storage areas;
- Identification of impacts that might result from the construction activity;
- Methodology and/or specifications for impact prevention / containment;
- Methodology for environmental monitoring;
- Emergency/disaster incident and reaction procedures; and
- Rehabilitation procedures and continued maintenance of the impacted environment.

The Contractor will be accountable for all actions taken in non-compliance of the approved Method Statement and this EMPr.

5. COMPLIANCE

Compliance involves actions and programmes designed to ensure that all relevant environmental laws, legislation, standards and other requirements such as permits are followed and adhered to.

5.1 Environmental monitoring and auditing

Environmental monitoring is the continuous evaluation of the status and condition of environmental elements, whereas, environmental auditing is the process of comparing the impacts predicted with those which have actually occurred during implementation.

The key to a successful Environmental Management System (EMS) is regular monitoring to identify and implement corrective measures in a timely manner and independent auditing to evaluate successful compliance with environmental specifications and outcomes. The ultimate purpose of environmental monitoring and auditing is to confirm that all relevant programmes, legislation, laws and policies are adhered to and abided by and that the environmental specifications are being implemented in an effective and correct manner. Monitoring and auditing is intended to promote environmental best practice, ensure protection of resources and support sustainable development.

5.2 Monitoring Methods

In order to ensure that the above objectives are met, the following monitoring methods will be employed:

- Aspect monitoring (such as water quality);
- Incident reporting;
- Site inspections;
- Site monitoring and reporting;
- Independent external auditing.

5.3 Timeframes/ Frequency

Site monitoring should be undertaken daily on an on-going basis throughout the project lifecycle. External auditing should take place once a month during the construction period, every 3 months during the rehabilitation period and annually during the operational period.

The completed monitoring reports should be submitted to all relevant parties, including the ECO who will conduct audits at regular intervals. Audit reports will, in turn, be submitted to all relevant parties, including the EO, who will drive the implementation of recommendations.

5.4 Non-compliance

Failure by the contractor, operator and their staff and suppliers to comply with all relevant programmes laws, legislation, policies and mitigation measures laid out in this EMPr will result in the following actions and consequences:

- Notifications will be issued in monitoring and auditing reports advising of failure to adhere to the measures stipulated in the BA/EIA/EMPr.
- Failure to comply / respond to notifications and recommendations within a specified timeframe will result in written warning being issued.
- Failure to comply / respond to warnings within a specified timeframe will result in fines being issued.
- Continued and wilful failure to comply / respond will result in a Non-conformance Report being issued to the Contractor.

5.5 Non-conformance

A Non-Conformance Report (NCR) will be issued to the Contractor as a final step towards rectifying a failure in complying with a requirement of the EMPr. This will be issued by the ECO to the Contractor in writing. Preceding the issuing of an NCR, the Contractor must be given an opportunity to rectify the non-conformance issues.

Should the ECO assess an incident or issue and find it to be significant (e.g. non-repairable damage to the environment), it will be reported to the relevant authorities and immediately escalated to the level of a NCR. The following information should be recorded in the NCR:

- Details of non-conformance;
- Any plant or equipment involved;
- Any chemicals or hazardous substances involved;
- Work procedures not followed;
- Any other physical aspects;
- Nature of the risk;
- Actions agreed to by all parties following consultation to adequately address the non-conformance in terms of specific control measures and should take the hierarchy of controls into account;
- Agreed timeframe by which the actions documented in the NCR must be carried out; and
- ECO should verify that the agreed actions have taken place by the agreed completion date, when completed satisfactorily; the ECO and Contractor should sign the Close-Out portion of the Non-conformance
- Form and file it with the contract documentation.

5.6 On-site documentation

An Environmental File including the following documentation (if applicable) must be kept on site during construction:

- EMPr;
- Environmental Authorization;
- Licenses/permits related to any other legislation;
- Specialist rehabilitation plans;
- Storm Water Management Plan;
- Flood Assessment Plan;
- Environmental Method statements compiled by the Contractor;
- Site Layout Plan

- Letter of appointment of ECO
- Written Notice of Commencement of construction
- Non-conformance Reports;
- Environmental register, which must include the following, but not limited to such:
 - Monitoring Results – including environmental monitoring reports, register of audits, Non-Conformance Reports (NCR); and
 - Incident book – including copies of notification of Emergencies and Incidents, this must be accompanied by a photographic record.
 - Safe disposal certificate for all types of waste disposed off-site;
 - Environmental training records;
 - Waste disposal receipts from a registered landfill site;
 - Material Safety Data Sheets for all hazardous substances;
 - Method Statements; and
 - Notification of Emergencies and Incidents

6. ENVIRONMENTAL AWARENESS

An environmental awareness plan must be implemented for both the construction and operational phases. The approved EMPr will provide the basis of the information to be supplied, as well as any other relevant documentation, including any specialist reports.

All construction and operational staff, as well as, suppliers and regular out-sourced contractors will be required to attend a general orientation session prior to the commencement of any activities. All impacts that could potentially arise and affect the environment will be discussed and explained in detail, as well as required mitigation measures. The consequences of not following the mitigation measures as stipulated in the EMPr (i.e. non-compliance) will also be addressed.

All permanent staff must receive detailed training relative to their specific job description. This training will focus on the environmental issues and impacts that are directly linked to their activities. Staff will be briefed on the correct protocol and procedures to follow in the event of an incident or accident (spill, fire etc.) in order to minimize and contain the damage.

In addition, staff will be required to report all incidents so that the appropriate mitigation measures can be implemented in a timely manner.

SECTION B: MANAGEMENT PLANS

The mitigation and recommendations contained in the Management Plans that follow have been based on best environmental practice and have been supplemented with specialist recommendations extracted from specialist reports developed in support of the Environmental Impact Assessment process for this project.

7. PLANNING AND DESIGN MANAGEMENT PLAN

The Planning Management Plan (PMP) addresses all aspects of the planning and design phase, such as the detailed architectural, infrastructural and engineering services layout and design. All members of the planning and design team are to be in possession of this Management Plan and must be aware of the environmental aspects, risks and mitigation measures.

7.1 Planning and compliance

To comply with regulations pertaining to surface water, ground water and protected species.

7.1.1 Ground water

General mitigation:

- Register boreholes to be used for potable water extraction as per DWS requirements.
- Obtain a Water Use License for listed activities (water abstraction, irrigation with purified effluent and overland discharge of purified effluent) if required.
- Ensure that overland discharge of excess purified effluent (if required) is undertaken in a controlled manner that does not cause erosion.
- No purified effluent may be discharged directly into any watercourse without the appropriate Water Use Licence in place.
- Specify water saving devices and technologies wherever possible. Measures include the specification of low flow shower heads and taps, and the use of grey water for on potable activities such as road wetting and irrigation.

7.1.2 Surface water

General mitigation:

- Buildings and other hardened surface infrastructure (including storm water attenuation measures) should try to be located outside of buffered watercourses.

7.1.3 Protected species

General mitigation:

- The sensitivity map must be used as a decision tool to guide the layout design for the spa accommodation units and dining room area, as well as the placement of the new WWTW. Development on areas of high environmental sensitivity must be avoided.

Specialist mitigation:

- The trees *Elaeodendron transvaalense*, *Sclerocarya birrea subsp. caffra* and *Balanites maughamii subsp. maughamii* are nationally protected and *Spirostachys africana* is protected under provincial legislation. It is recommended that all development take place around these trees and that they be left untouched. If this is unavoidable then destruction permits from the relevant authorities will have to be applied for.

7.1.4 Storm water management

General mitigation:

- As per the Storm Water Management Plan (refer to section 11.1).

7.1.5 Waste management

General mitigation:

- As per the Waste Management Plan (refer to section 10.1).

7.1.6 Heritage

General mitigation:

- Archaeological deposits usually occur below ground level. Should archaeological artefacts or skeletal material be revealed in the area during development activities, such activities should be halted, and a university or museum notified in order for an investigation and evaluation of the find(s) to take place (cf. NHRA (Act No. 25 of 1999), Section 36 (6)).

7.2 Development footprint planning

To ensure the development footprint is kept to a minimum and that sensitive environs are taken into consideration

General mitigation:

- Consolidate the location of structures and infrastructure so as to localise and contain the development footprint as much as possible. Retain all areas beyond the development footprint as natural / conservation landscape.
- Refine the final layout of roads, buildings and infrastructure so these are located within natural bush clearings rather than removing vegetation to make way for infrastructure. This will allow the development to blend in with the receiving environment to a greater extent both visually and ecologically.
- No manicured landscape or gardening is permitted. All areas beyond the development footprint are to be rehabilitated as natural bush using appropriate endemic species.
- The internal road network should be developed as gravel tracks that allow for faunal dispersal and minimize fragmentation of ecologically sensitive areas.
- Plan to leave as much of the natural vegetation intact as possible.
- Ensure that all permanent structures and infrastructure is located outside of the 1:100 year floodline if possible.
- If development within the riparian zone is unavoidable due to terrain, access or substrate, the proposed infrastructure should comply with the following mitigation measures and recommendations:
 - No canopy (tall) trees to be removed. All infrastructure to be designed around them;
 - Access to the construction site within the riparian zone should only be from the terrestrial side, not from the drainage line / river bed itself;
 - All lay-down and stockpile areas and equipment storage to be situated outside the riparian zone;
 - All reasonable measures to be taken during construction to stabilise steep banks in the riparian zone against erosion and collapse;
 - An ECO should be appointed to supervise and guide construction workers.

Specialist mitigation:

- Prior to any construction at any of the sites, an experienced botanist should conduct a walk-through, marking each plant species of conservation concern to be avoided or that may need to be relocated prior to any site clearance activity taking place.

7.3 Visual environment planning

To ensure that the visual impact on the surrounding area and sense of place will be kept to a minimum

7.3.1 General planning and design

General mitigation:

- Make use of earth tones and natural materials rather than primary colours and high-tech finishes.
- Visually break up large bulky buildings into smaller, subtler, less prominent shapes and planes.
- Make use of suitable paint colours on steel roofs reduce the impact of glare from sunlight.
- Make use of earthy, muted colours and avoid pastel and primary colours.
- Make use of natural, non-reflective, earthy materials rather than high-tech reflective materials.
- Avoid large expanses of glass. Where glass is used, ensure that this is tilted and tinted to reduce glare.
- No manicured landscape or gardening is permitted. All areas beyond the development footprint are to be rehabilitated as natural bush using appropriate endemic species.

7.3.2 Lighting

General mitigation:

- Shielding the sources of light by physical barriers (walls, vegetation, or the structure itself).
- Limiting mounting heights of lighting fixtures, or alternatively using foot-lights or bollard level lights.
- Making use of minimum lumen or wattage in fixtures.
- Making use of down-lighters, or shielded fixtures.
- Making use of Low Pressure Sodium lighting or other types of low impact lighting.
- Making use of motion detectors on security lighting. This will allow the site to remain in relative darkness, until lighting is required for security or maintenance purposes.

7.4 Socio-economic planning

To ensure community beneficiation via job creation and skills transfer

General mitigation:

- The local authorities, community representatives, and organisations on the interested and affected party database should be informed of the final decision regarding the project and the potential job opportunities for locals and the employment procedures that the Applicant intends following for the construction phase of the project.

8. CONSTRUCTION MANAGEMENT PLAN

The Construction Management Plan (CMP) addresses the environmental risks and impacts associated with the construction phase. This plan must be adhered to at all times during the construction phase.

It is the responsibility of the contractor, in conjunction with EO and ECO, to educate, inform and foster a sound understanding of the CMP in all staff, sub-contractors, suppliers etc. Strict adherence to the CMP must be enforced and monitored.

An 'Environmental Site Book' should be supplied and kept on site. This site book should be in the form of a file and will house all environmental status reports as compiled by the ECO. All issues and proposed actions as noted by the ECO during site visits will also be documented in the site book. The EMP, as well as, a copy of the environmental sensitivity plans and construction layout plan must be available onsite.

8.1 Pre-construction

To ensure that all construction staff and contractors are aware of what is expected of them in terms of conduct and environmental performance

8.1.1 Planning and preparation

General mitigation:

- An independent Ecological Control Officer (ECO) must be appointed to oversee construction.
- A permanent Environmental Officer (EO) must be designated to monitor environmental compliance on a day-to-day basis on the construction site.
- The ECO must be consulted to identify possible suitable construction site camps (to be verified by a qualified botanist).
- Based on the ECO's recommendations for preferred sites, the contractor must develop a plan of the operations of the construction site indicating the position of all construction activities, including but not limited to: offices, ablution facilities, storage areas, workshops, batching plant, stockpile areas, waste disposal facilities, hazardous substance storage area, access routes, etc. This layout plan is to be submitted to the ECO for acceptance prior to site establishment. Any changes to this plan will need to be reviewed in conjunction with the ECO.
- The contractor must develop a management and monitoring programme for alien and invasive species detailing basic ID information, actions to prevent the establishment of invasive plants and methods of removal of site during construction.
- The contractor must ensure that his construction staff is briefed as to the provisions of the EMPr.
- An Environmental Awareness Plan must be presented before the commencement of any construction activities. All construction staff must be aware of the biodiversity importance of the area (pertaining to all development areas);
- The contractor must comply at all times with the Occupational Health and Safety Act and implement an HIV/AIDS awareness programme for all construction workers at the outset of the construction phase.
- Construction activities may only commence once the Contractors method statement has been approved by the ECO.
- The contractor is to provide the scheduling for construction to the ECO prior to commencement of construction. Should this schedule change, the contractor is to send a revised schedule to the ECO.

Specialist mitigation:

- Prior to any construction at any of the sites, an experienced botanist should conduct a walk-through, marking each plant species of conservation concern to be avoided or that may need to be relocated prior to any site clearance activity taking place.

8.2 Site establishment

To ensure that the construction footprint is kept to a minimum in order to conserve and protect plant and animal species and habitat and to ensure that site facilities, structures and infrastructure do not impose on the surrounding environment

8.2.1 Site demarcation

General mitigation:

- Minimize the construction footprint and where possible, restrict all construction related activities to previously disturbed areas or transformed vegetation.
- A perimeter fence or suitable perimeter demarcation (such as steel droppers and hessian rope) must be erected around the construction works area to prevent access to adjacent bush and sensitive environs. Buffer areas and identified sensitive environments must be demarcated as No-go zones, where no construction activities or staff are permitted.
- Demarcate vegetation and other site features to be retained with danger tape and / or fencing as required. This barrier to be at least 2m from the stem of the specimen / feature.

- Establish and maintain site demarcations for the duration of the construction phase. Ensure that materials do not blow or move outside of the demarcation line.
- Prohibit vehicular or pedestrian access into all natural areas beyond the demarcated boundary of the construction site.
- Clearly indicate which activities are to take place in which areas within the site e.g. the mixing of cement, stockpiling of materials etc. Limit these activities to single sites wherever possible.
- The ECO's details should be displayed on a notice board at the entrance to the site so members of the public can report perceived transgressions of conditions.

Specialist mitigation:

- The trees *Elaeodendron transvaalense*, *Sclerocarya birrea subsp. caffra* and *Balanites maughamii subsp. maughamii* are nationally protected and *Spirostachys africana* is protected under provincial legislation. It is recommended that all development take place around these trees and that they be left untouched. If this is unavoidable then destruction permits from the relevant authorities will have to be applied for.

8.2.2 Accommodation

General mitigation:

- All construction staff need to be accommodated off-site and driven to site each day. No construction workers, with the exception of security personnel, should be permitted to stay overnight on the site.
- Should the accommodation of staff off-site not be possible then approval first needs to be obtained from the ECO. Should approval be granted then the following needs to be implemented:
 - A plan showing the layout of the construction camp and associated infrastructure must be developed by the contractor and submitted to the ECO for approval prior to the commencement of construction.
 - The construction camp should be located, where possible, in a previously disturbed area, at least 100m away from any water course/drainage lines and must not be situated on a floodplain or slopes greater than 1:3.
 - No permanent infrastructure should be erected in the construction camp.
 - Vegetation and trees to be retained must not be damaged or felled.
 - Accommodation of personnel is to include both kitchen and sanitary facilities.
 - Approval to make fires in camp need to be first approved by the ECO and Management Authority. Should approval be obtained, fires will only be allowed in facilities especially constructed for the purpose and no trees may be specifically felled for obtaining firewood. All fires are to be extinguished properly following use.
 - Adequate ablution should be supplied to the site staff. The location of these must be approved by the ECO. Under no circumstances may open areas or surrounding bush be used as a toilet facility.
 - Regular inspections must be carried out to ensure toilets are kept clean.
 - Portable water must be supplied. This will be utilized for drinking, cooking and ablution. Great care is required and should be taken to ensure that the water supply is not contaminated in any way.
 - All waste water, as a result of showing facilities and kitchen clean-up areas, etc. needs to be directed into a temporary soak away. The soak away needs to be located at least 100m away from any wetland, watercourse or drainage line. Under no circumstances is waste water allowed to be discharged overland.
 - Bins and/or skips must be provided at convenient intervals for disposal of waste within the construction camp. Refuse generated from the campsite, construction area, storage area or any other area must be collected and placed in a suitably closed container daily. Once full, the refuse container must be emptied and contents disposed of at a licensed facility.
 - The affected area needs to be fully rehabilitated following completion of construction.

- Staff can be transported in open vehicles, as long as the vehicles have built up sides, with a cover or roof of some sort.
- Designate an area for food preparation and consumption and ensure that facilities are available to properly store, prepare and consume food, as well as to wash up afterwards.
- Food and utensils must be properly stored away, and may not be left lying around.

8.2.3 Pollution control

General mitigation:

- The Contractor must take reasonable precautions to prevent the pollution of the ground and / or water resources on and adjacent to the site as a result of his activities.
- Install a drainage diversion system to divert clean runoff around areas of potential pollution, e.g. batching areas, workshops, etc.
- Direct polluted runoff and waste water emanating from the construction site into a collection system (e.g. sump, attenuation dam, PVC porta-ponds, etc.) for treatment or collection and disposal.
- Collected contaminated runoff / wastewater is to be pumped out of the final collection point and disposed of at an appropriate waste disposal site. Sump liners are to be treated in the same manner.
- Prevent polluted water from reaching the watercourses.
- Washing of plant / equipment / concreting equipment etc. may only be washed in dedicated areas and the dirty water is not allowed to discharge into a watercourse or surrounding natural vegetation
- The Contractor is encouraged to recycle dirty wash water to minimise the amount to be removed off-site.
- No natural watercourse is to be used for the cleaning of tools or any other apparatus. This includes for purposes of bathing, or the washing of clothes etc.
- The Contractor may discharge 'clean' silt laden water overland and allow this water to filter into the ground. However, he shall ensure that he does not cause erosion as a result of any overland discharge.
- Trucks delivering concrete shall not be washed on site or anywhere inside the Reserve.

8.2.4 Access roads

General mitigation:

- Construction of proposed roads should not be wider than necessary with a maximum width of 3m.
- Regulate and control movement over the site. Personnel, vehicles and equipment to move along designated routes only.
- The contractor must maintain all access and site roads and repair these as required. Damage caused to roads by the construction related activities, including heavy vehicles, must be repaired before the completion of the construction phase. The costs associated with the repair must be borne by the contractor.
- Upon completion of the construction period, the Contractor shall ensure that the access roads are returned to a state no worse than prior to construction commencing.
- All disturbed areas along the fringes of access roads must be rehabilitated once the road is complete.

Specialist mitigation:

- All existing and proposed roads to contain adequate stormwater drainage and erosion control measures.

8.2.5 Protection of flora

General mitigation:

- Vegetation disturbance and removal must be kept to a minimum and the areas monitored to ensure that areas are exposed for brief periods of time only.

- Construction activities must be carefully planned and implemented in such a way that facilitates and aids in the rehabilitation and establishment of plant communities.
- Progressively rehabilitate (rip, scarify and plant) areas as soon as works have been completed.
- Implement fines for the damage or destruction of marked and protected specimens. It is the contractor's responsibility to ensure that these are retained.
- Do not mark or deface any natural feature.
- No large tree (with a trunk diameter exceeding 200mm) may be felled without the permission of the ECO.
- Consider the selective trimming of branches before opting to remove any trees.
- No material storage or lay down is permitted under trees.
- Remove only the vegetation where essential for construction and do not allow any disturbance to the adjoining natural vegetation cover. No vegetation outside of the demarcated construction areas may be removed whatsoever.
- Retain vegetation and soil within construction areas in position for as long as possible, removing it immediately ahead of construction / earthworks in that area.
- Workers may not tamper or remove flora and neither may anyone collect seed from the plants without permission from the local authority.
- Only wood from trees felled as part of the construction contract may be sold / made available for firewood. No dead wood may be gathered from the surrounding veld.
- Implement a Plant Rescue Plan for protected species within the construction areas. Where feasible, these should be removed by a suitably qualified specialist and replanted as part of vegetation rehabilitation plan.

Specialist mitigation:

- Wherever possible, trees taller than 5 m or with a diameter at breast height of 30 cm should be left unharmed, whether protected by law or not.
- The trees *Elaeodendron transvaalense*, *Sclerocarya birrea subsp. caffra* and *Balanites maughamii subsp. maughamii* are nationally protected and *Spirostachys africana* is protected under provincial legislation. It is recommended that all development take place around these trees and that they be left untouched. If this is unavoidable then destruction permits from the relevant authorities will have to be applied for.

8.2.6 Protection of the riparian system

General mitigation:

- Do not create additional drainage line crossings without the express permission of the ECO. The ECO will ensure that the crossing is permitted in terms of DWS's General Authorisations, Construction and rehabilitation of the crossing must be as per the ECO's instruction.
- Construction within or near drainage lines should take place outside of the rainy season when the flow of the non-perennial rivers is at a minimum.
- Avoid the sealing of surfaces under a bridge or gabion construction.

8.2.7 Protection of fauna

General mitigation:

- Ensure that construction personnel are briefed on the potential occurrence of protected faunal species, what they look like, and where they are likely to be found. Personnel are to be instructed that these species are not to be hurt or destroyed if encountered. This applies specifically to the snakes, lizards and spiders, as these are often perceived to be vermin and pests.
- Personnel must be instructed to report the presence of protected species to the contractor or EO so that arrangements may be made to relocate these to adjacent bush areas.

- Develop a procedure for dealing with animals encountered on the site, including dangerous animals and vermin. Where necessary, call in professionals to remove the animals.
- Personnel are to be instructed on the presence of dangerous game and the appropriate behaviour and safety upon encountering such game.
- Ensure that all personnel are aware of what the procedures for dealing with animals are. It is the contractor's responsibility to ensure that proper procedures are followed.
- Pets and livestock are not allowed on site.
- No poaching or snaring of any game is permitted. The contractor must regularly undertake checks of the surrounding natural vegetation and along game paths to ensure no traps have been set. Remove and dispose of any snares or traps found on or adjacent to the site. The contractor must implement fines in this regard.

Specialist mitigation:

- Poaching could be a significant threat. If any external labour teams are used during construction, then these teams should preferably be accommodated off site; if this is not possible then teams should be carefully monitored to ensure that no unsupervised access to plant and animal resources takes place.

8.2.8 Protection of cultural heritage

General mitigation:

- If archaeological or historical 'chance finds' are encountered, then work in the area must be halted, and a heritage specialist must be called to assess the situation and make recommendations.
- If any fossils are discovered during the construction then a palaeontologist must be called to assess their importance and rescue them if necessary.

8.3 Materials management

To ensure that waste management activities on site are undertaken in the correct manner and that staff are aware of the procedures

8.3.1 Solid, liquid and hazardous waste

General mitigation:

- As per Waste Management Plan (refer to section 10.2).

8.3.2 Concrete and cement work

General mitigation:

- Ensure that concrete and cement works are undertaken in specified areas only.
- Ensure that all operations that involve the use of cement and concrete are carefully controlled. Water and slurry from concrete mixing operations must be contained to prevent pollution of the ground surrounding the mixing points.
- Use plastic trays or liners when mixing cement and concrete: Do not mix cement and concrete directly on the ground.
- Excess concrete from mixing must be deposited in a designated area awaiting removal to an approved landfill site.
- All visible remains of excess concrete shall be physically removed immediately and disposed of as waste. Washing the visible signs into the ground is not acceptable. All excess aggregate shall also be removed.

8.3.3 Fuel and hazardous material

General mitigation:

- Provide the ECO with a list of all petroleum, chemical, harmful and hazardous substances and materials on site, together with storage, handling and disposal procedures for these materials.
- Ensure that all hazardous substances (chemicals, oils, etc.) are stored in appropriate, tamper proof containers in locked stores.
- Petroleum, chemical, harmful and hazardous materials must be stored in enclosed, bunded areas. The bunded areas shall be clearly marked.
- The bund must have a volume of 10% of the volume of the largest tank in the storage area plus 10% of the volume of all other tanks.
- The slab must be sloped towards a sump to enable any spilled fuel and water to be removed.
- Any wastewater collected at the sump shall be disposed of as hazardous waste.
- Ensure that all hazardous substances are used and handled by qualified personnel on bunded surfaces.
- Ensure that no oil, petrol, diesel etc. is discharged onto the ground.
- All hazardous products to be dispensed from 200 litre drums shall be transferred by pump, and not dispensed by tipping of the drum.
- Tanks containing fuel must have lids, which are to remain firmly shut.
- Gas and liquid fuel may not be stored in the same storage area.
- No smoking is allowed inside the stores or within 3m of a bund.
- The Contractor must ensure that there is adequate fire-fighting equipment at the fuel stores.
- Fuels and chemicals may not be stored under trees.
- Exercise extreme care with the handling of diesel and other toxic solvents so that spillage is minimised.

8.4 Stockpiles, storage and handling

To ensure that all materials are handled and stored in the correct manner so as to protect the materials and the environment

General mitigation:

- Conserve topsoil through pre-emptive stripping and stockpiling prior to the commencement of works in any area, pending reapplication during rehabilitation.
- Strip topsoil together with grass / groundcover from all areas where permanent or temporary structures are located, construction related activities occur, and access roads are to be constructed.
- Topsoil is to be handled twice only - once to strip and stockpile, and secondly to replace, level, shape and scarify.
- Co-ordinate works to limit unnecessarily prolonged exposure of stripped areas and stockpiles. Retain vegetation and soil in position for as long as possible, removing it immediately ahead of construction / earthworks in that area.
- Do not strip topsoil when it is wet.
- Topsoil stockpiles must be positioned/ stored in approved locations only.
- Topsoil stockpiles may not exceed 2 m in height and should be protected from erosion
- Do not disturb, compact or disrupt topsoil stockpiles, and ensure that nothing is stored on them;
- Regular weeding of stockpiles must occur to ensure that no invasive or alien plant species are established.
- Topsoil stockpiled for extended periods of time must be revegetated with indigenous grasses.
- Topsoil is to be replaced along the contour.
- Topsoil is to be replaced by direct return where feasible (i.e. replaced immediately on the area where construction is complete), rather than stockpiling it for extended periods.

8.5 Erosion control

To reduce the erosive effects of surface water runoff on exposed soils

8.5.1 Water management

General mitigation:

- Monitor water consumption to ensure that there is no undue waste. Keep records of water monitoring and make these available to the ECO upon request.
- Ensure that consumption does not exceed permitted quantities. Take action to reduce consumption if necessary.
- Ensure that all construction personnel are trained in water wise principles, and that they practise prudent use of water during the construction phase.

8.5.2 Storm water management

General mitigation:

- As per the Storm Water Management Plan (refer to section 11.2).

8.5.3 Excavation, backfilling and trenching

General mitigation:

- Do not excavate until all required materials / services are on-site, to facilitate immediate laying of services / construction of subsurface infrastructure.
- In general, excavations remaining open overnight must be fenced or equipped with escape ramps to allow trapped animals to escape.
- Preferably undertake clearing activities during the dry season in order to prevent erosion and siltation.
- Excavation of sand to solid ground to be done carefully and appropriate drainage incorporated i.e. sand and debris need to be removed and solid rock preferably exposed to ensure proper binding with concrete material.
- Construction must preferably be extended over rocky substrate to give maximum anchoring opportunity.
- Progressively reinstate of disturbed areas to topsoil profile on an on-going basis, immediately after selected construction activities (e.g. backfilling of a trench) are completed. This allows for passive rehabilitation (i.e. natural re-colonisation by vegetation) to commence.
- Deficiency of backfill material shall not be made up by excavation within the protected area.
- Excavated material is to be stockpiled along a pipeline trench within the working servitude, unless otherwise authorised.
- Subsoil backfill to be followed by topsoil. Compact backfilled trenches to prevent erosion. Subsoil to be compacted to engineer's specification.
- Consider using any excess rocks and boulders that were excavated from the construction site for any erosion protection work, which is required on site. Consider removing the rocks for the packing of gabions at other soil erosion sites.
- Removed soil is to be used to backfill areas where required and excess is to be landscaped into natural looking banks that fit the surrounding topography.
- Monitor backfilled areas for erosion and remediate as required.
- Progressively rehabilitate (rip, scarify and plant) areas as soon as works have been completed

8.6 Alien plant control

To prevent the spread and establishment of alien invasive plant species owing to exposed soils.

General mitigation:

- Alien invasive species within the site should be removed prior to construction-related soil disturbances.

- All sites disturbed by construction activities must be monitored for colonization by invasive alien plant species.
- All alien seedlings and saplings must be removed as they emerge or become evident for the duration of construction.
- Manual / mechanical removal is preferred to chemical control.
- Follow manufacturer's instruction when using chemical methods, especially in terms of quantities, time of application etc.
- Ensure that only properly trained people handle and make use of chemicals.
- Limit herbicide and pesticide use to non-persistent, immobile products and apply in accordance with label and application permit directions and stipulations for terrestrial and aquatic applications.
- All construction vehicles and equipment, as well as, construction material should be free of plant material. Therefore, all equipment and vehicles should be thoroughly cleaned prior to access to the Reserve.

Specialist mitigation:

- In order to comply with the Conservation of Agricultural Resources Act (Act 43 of 1983), all listed invasive exotic plants should be targeted and controlled. This is especially applicable to **Lantana camara*, **Datura stramonium*, **Ricinus communis*, **Xanthium spinosum*, **Salvinia adnata*, **Sesbania punicea* and **Opuntia stricta*.

8.7 Vehicles and equipment management

To ensure that all construction vehicles and equipment are in good working order and condition

General mitigation:

- Maintain site vehicles and equipment in an acceptable state of repair. All vehicles must be road-worthy and regularly serviced.
- All road rules and speed limits must be adhered to at all times.
- Construction staff should only use authorised paths and roads.
- All drivers employed during the construction phase must be briefed and notified of the potential safety risks posed by construction vehicles to members of the local community.
- Regularly check vehicles, machinery and equipment operating on site to ensure that none have leaks or cause spills of oil, diesel, grease or hydraulic fluid.
- Construction vehicles are to be maintained in an acceptable state of cleanliness when leaving site. Sand, dust and spillages from these vehicles that inevitably fall on the main roads should be cleared on a regular basis.
- Construction vehicles transporting materials to and from the construction site must be covered to reduce the formation of dust.
- Ensure that the maintenance of all vehicles and equipment, including oil and lubricant changes, takes place only within properly equipped, bunded maintenance areas or workshops.
- Pumps and other machinery requiring oil, diesel etc., which are to remain in one position for longer than two days shall be placed on drip trays. The drip trays shall be watertight and shall be emptied regularly and the contaminated water disposed off-site at a facility capable of handling such waste liquid. Drip trays shall be cleaned before any possible rain events that may result in the drip trays overflowing
- Movement of heavy vehicles and machinery to be limited wherever possible, and construction noise reduced wherever possible.
- Contactors will be required to submit a delivery timetable. Strict control is to be exercised over entering and exiting traffic and delivery procedures.
- Vehicles used during construction or to transport material or staff on site, should have the minimum impact on the environment (trees, roads or other) or other road users. The size, height and weight of vehicles must be kept in mind; the access route will determine the type of vehicle that can be used.
- Adjacent landowners must be given due warning ahead of any particularly loud construction works.

8.8 Socio-economic management

To ensure community beneficiation via job creation and skills transfer and to mitigate the visual and noise impact of the construction works

8.8.1 Staff

General mitigation:

- Implement a policy that no employment will be available at the gate.
- The movement of construction workers on and off the site should be closely managed and monitored by the contractor and Reserve Management. In this regard the contractor is responsible for making the necessary arrangements for transporting workers to and from site on a daily basis, specifically construction workers who are not from the local municipality.
- The contractor must make the necessary arrangements for allowing workers from outside the area to return home over weekends. This would reduce the risk posed by construction workers to local family structures and social networks.

8.8.2 Visual

General mitigation:

- Reduce the construction period through careful logistical planning and productive implementation of resources.
- Restrict construction activities to daylight hours in order to negate or reduce the visual impacts associated with lighting. No after hour's construction work or work on weekends or public holidays is permitted.
- A dust abatement programme should be used. Standard dust abatement measures include watering or otherwise stabilising soils, covering haul trucks, employing speed limits on unpaved roads, minimising vegetation clearing, and promptly re-vegetated after construction is completed.
- Vegetate or cover long-term stockpiles of soil and fine spoil material to minimise the sources of dust pollution.
- Rehabilitate all disturbed areas, construction areas, roads, slopes etc. immediately after the completion of construction works

Specialist mitigation:

- Dust suppression measures must be implemented such as wetting of the site and access roads on a regular basis and ensuring that vehicles used to transport sand and building materials are fitted with tarpaulins or covers.

8.9 Fire management

To safe guard and protect the environment from any potential fire hazards

General mitigation:

- As per the Fire Protection Management Plan (refer to section 12.1).

8.10. Rehabilitation

To ensure that the site is restored to its natural state prior to any construction activities

General mitigation:

- Rehabilitation must be implemented immediately upon completion of construction.

- After construction, the land must be cleared of rubbish, surplus materials, and equipment, and all parts of the land must be left in a condition as close as possible to that prior to construction.
- Excess topsoil is to be spread evenly over the area in a manner that blends in with the natural topography.
- Excess stockpiled building material is to be removed completely and the areas levelled.
- All disturbed areas must be levelled and cleared of any foreign material. It is unacceptable to leave foreign material behind with the knowledge that it will become hidden amongst the rejuvenating vegetation with time.
- Construction areas, disturbed sites and obsolete roads should be rehabilitated by breaking the surface crust and erecting earth embankments to prevent erosion, while vegetation should be re-established.
- Ensure that the construction site is rehabilitated using appropriate indigenous vegetation. Salvaged vegetation, rather than new planting or seeding, should be used to the extent possible.
- Specifications for soil preparation, endemic plant/seed mixes, fertilizer, and mulching should be provided for all areas disturbed by construction activities.
- With the permission of the local authority, seed from appropriate indigenous species may be harvested for later use during rehabilitation. An ecologist should be consulted in this regard.
- Plants that are removed / propagated during construction may be maintained on site and used to re-vegetate the disturbed soil.
- All harvested seeds and seedlings, as well as plants removed for transplanting which are not immediately re-planted, are the responsibility of the Contractor and must be kept under approved nursery conditions.
- Cordon off rehabilitated areas and do not allow grazing or access into these areas until such time that re-vegetation was found to be successful.
- Rehabilitated areas must be monitored regularly to ensure that revegetation is successful, plants are maintained, weeds and invaders are removed, and that areas where replanting is unsuccessful are replaced.

Specialist mitigation:

- All rehabilitation should make use of indigenous plant species, and preferably of species native to the study area and immediate surroundings. The species selected should strive to represent habitat types typical of the ecological landscape prior to construction.

9. OPERATIONAL MANAGEMENT PLAN

The Operational Management Plan (OMP) identifies and addresses the environmental risks and impacts associated with the day-to-day operation of the development. This plan must be adhered to at all times during the operational phase.

It is the Operators responsibility to ensure the implementation of all mitigation measures contained in the OMP in order to prevent/minimize the environmental impacts associated with the operations.

9.1 Biodiversity management

To ensure the continued integrity of the natural environment and the conservation of fauna and flora, particularly in rehabilitated areas.

9.1.1 Access roads

General mitigation:

- Regulate and control movement over the site. Personnel, vehicles and equipment to move along designated routes.

- Maintain all roads in good condition to prevent dust and erosion.
- Runoff from roads must be managed to avoid erosion and pollution problems.
- No drainage line crossings may be developed without the express permission of DWS.
- The internal road network should be maintained as gravel tracks that allow for faunal dispersal and minimize fragmentation of ecologically sensitive areas.

9.1.2 Resource management

General mitigation:

- Ensure that the Water Use license for the property is in place and up to date.
- Monitor water consumption to ensure that there is no undue waste. Keep up to date records of water monitoring and make these available to the ECO upon request.
- Ensure that consumption does not exceed permitted quantities. Take action to reduce consumption if necessary.
- Install a leak detection system, and promptly attend to leaks as required.
- Quality tests on the waste water will be undertaken on a monthly basis to ensure that the output quality of the effluent complies with the minimum standards as prescribed by DWS. These records will be kept up to date and made available upon request.
- Ensure that all facility staff is trained in water wise principles, and that they practise prudent use of water at all times.
- Post a Code of Conduct in guest rooms and other relevant advising guests of relevant Reserve rules and regulations.

Specialist Mitigation:

- Water saving measures will be implemented where possible and practical. The use of draught resistant species in landscaping around the lodges will be planted, irrigation will be done with volumes that can be obtained from the new wastewater treatment works.

9.1.3 Protection of flora

General mitigation:

- Ensure that all conserved species and specimens are suitably protected for the duration of the operational phase.
- No protected trees or plants may be removed without the relevant permits from the local authority.
- Implement fines for the damage or destruction of marked and protected specimens.
- Guests and staff may not tamper or remove flora and neither may anyone collect seed from the plants without permission from the local authority.
- The picking of flowers or removal of plants should be prohibited in the Guest Rules.
- No bush clearing is allowed, either to enhance game viewing, for firewood or for any other purpose.
- Maintenance workers and guests may not trample natural vegetation and work should be restricted to dedicated roads, paths and gardens within the development footprint.
- No unauthorised access is permitted to buffer areas or any natural areas outside of the facility footprint.
- No wood may be collected for firewood or any other purpose.
- No large tree (with a stem diameter exceeding 200mm) may be felled without the permission of the ECO.

Specialist mitigation:

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9.1.4 Alien plant control

General mitigation:

- The operator must develop a management and monitoring programme for alien and invasive species detailing basic ID information, actions to prevent the establishment of invasive plants and methods of removal of site during construction.
- Monitor all sites disturbed by construction activities for colonisation by exotics or invasive plants and control these as they emerge.
- Manual / mechanical removal is preferred to chemical control.
- Follow manufacturer's instruction when using chemical methods, especially in terms of quantities, time of application etc.
- Ensure that only properly trained people handle and make use of chemicals.
- Limit herbicide and pesticide use to non-persistent, immobile products and apply in accordance with label and application permit directions and stipulations for terrestrial and aquatic applications.

Specialist mitigation:

- In order to comply with the Conservation of Agricultural Resources Act (Act 43 of 1983), all listed invasive exotic plants as indicated in Appendix 1 should be targeted and controlled. This is especially applicable to **Lantana camara*, **Datura stramonium*, **Ricinus communis*, **Xanthium spinosum*, **Salvinia adnata*, **Sesbania punicea* and **Opuntia stricta*.
- Management measures to eradicate and control alien plants need to be informed by the Reserve's invasive species management program.
- Grounds staff should be trained to recognize and eradicate potential invasive plants.
- Undertake yearly removal of aliens within the area (done in summer) until equilibration is reached. This may take several years.
- Developers must implement an alien plant control program to combat the infestation present, especially along the edges and within drainage lines and wetlands. This program should include regular inspections and follow-ups.

9.1.5 Protection of fauna

General mitigation:

- The development should maintain connectivity between ecologically important habitats by retaining natural corridors for the movement of fauna.
- No unauthorised access is permitted to buffer areas or any natural areas outside of the facility footprint.
- Maintain a game / security fence or suitable equivalent around the perimeter of the River Lodge. This fence should, however, be designed to allow access by small mammals, tortoises etc.
- Ensure that personnel are briefed on the potential occurrence of protected faunal species, what they look like, and where they are likely to be found. Personnel are to be instructed that these species are not to be hurt or destroyed if encountered. This applies specifically to the snakes, lizards, chameleons and spiders, as these are often perceived to be vermin and pests.
- Personnel must be instructed to report the presence of protected species to the contractor or EO so that arrangements may be made to relocate these to adjacent bush areas.
- Develop a procedure for dealing with animals encountered on the site, including dangerous animals and vermin. Where necessary, call in professionals to remove the animals.
- Ensure that all personnel are aware of what the procedures for dealing with animals are. It is the operator's responsibility to ensure that proper procedures are followed.
- Pets and livestock are not allowed on site.
- No poaching or snaring of any game is permitted. Reserve Management must implement fines in this regard.
- Guests should be briefed on the dangers of feeding wildlife, and must be discouraged from feeding any animal. Guests should also be informed of recommended measures to secure food and food waste from animal scavengers.
- All food and waste storage areas must be properly secured against animal scavengers at all times.

Specialist mitigation:

- Reserve Management should periodically search the natural bush in the general vicinity of the Lodge site in order to detect whether snaring is taking place
- Yellow light bulbs should be utilized as they attract fewer insects and arachnids.
- Outside lighting should preferably be directed away (or "inland") from the riparian zone.
- Internal lights should be shielded by blinds/curtains.
- Control measures should be implemented (e.g. limit the number of individuals) access to the riparian zone
- No feeding of any animals is permitted anywhere.
- Noise should be kept to a minimum at night.

9.1.6 Protection of heritage resources

General mitigation:

9.2 Materials management

To ensure proper waste storing, handling and disposal of materials and waste

9.2.1 Solid, liquid and hazardous waste

General mitigation:

- As per the Waste management Plan (refer to section 10.3)

9.2.2 Fuel and hazardous material

General mitigation:

- Ensure that all hazardous substances (chemicals, oils, etc.) are stored in appropriate, tamper proof containers in locked stores.
- Petroleum, chemical, harmful and hazardous materials must be stored in enclosed, bunded areas. The bunded areas shall be clearly marked.
- The bund must have a volume of 10% of the volume of the largest tank in the storage area plus 10% of the volume of all other tanks.
- The slab must be sloped towards a sump to enable any spilled fuel and water to be removed.
- Any wastewater collected at the sump shall be disposed of as hazardous waste.
- Ensure that all hazardous substances are used and handled by qualified personnel on bunded surfaces.
- Ensure that no oil, petrol, diesel etc. is discharged onto the ground.
- All hazardous products to be dispensed from 200 litre drums shall be transferred by pump, and not dispensed by tipping of the drum.
- Tanks containing fuel must have lids, which are to remain firmly shut.
- Gas and liquid fuel may not be stored in the same storage area.
- No smoking is allowed inside the stores or within 3m of a bund.
- The Contractor must ensure that there is adequate fire-fighting equipment at the fuel stores.
- Fuels and chemicals may not be stored under trees.
- Exercise extreme care with the handling of diesel and other toxic solvents so that spillage is minimised.

9.3 Erosion control

To ensure that areas cleared of vegetation are protected and allowed to restabilize

General mitigation:

- As per the Storm Water Management Plan (refer to section 11.1).

9.4 Vehicles and equipment management

To maintain air quality standards and limit soil and water contamination and pollution

General mitigation:

- Maintain site vehicles and equipment in an acceptable state of repair.
- Personnel, vehicles and equipment to move along designated routes.
- No off-road driving is permitted.
- Speed control measures must be implemented on site and in the surrounding area to reduce air pollution and animal mortality.
- Maintenance activities should be limited to daylight hours and vehicles should remain on the designated roads at all times.
- Carpools and lift clubs must be encouraged and staff picked up at a central point. Staff must not be discouraged from travelling to site in private vehicles.

Specialist mitigation:

- All vehicles must be road-worthy and drivers must be qualified and made aware of the potential road safety issues and need for strict speed limits (50km on surfaced road and 40km on gravel road in the Reserve).
- Ensure vehicles are regularly serviced so that oil/fuel leaks are limited and keep undersides of vehicle free of oil to limit wash from rivers during use of basic crossings.

9.5 Socio-economic management

To mitigate the socio-economic impacts associated with the operation of the facility, specifically pertaining to visual and noise impacts

9.5.1 Staff management

General mitigation:

- The Operator is responsible for making the necessary arrangements for transporting staff to and from site on a daily basis.
- Where feasible, efforts should be made to employ local employees that are compliant with Black Economic Empowerment (BEE) criteria.
- Where feasible, training and skills development programmes for locals should be initiated and maintained throughout the operational phase.
- The recruitment selection process should seek to promote gender equality and the employment of women wherever possible.
- Clear criteria for identifying and funding projects and initiatives should be identified. The criteria should be aimed at maximising the benefits for the community as a whole and not individuals within the community.

9.5.3 Visual impact management

General mitigation:

- Retain and maintain natural vegetation in all areas outside of the development footprints.
- Maintain the general appearance of all of the sites as a whole, including roads and servitudes.

9.6 Fire management

To prevent any unplanned and uncontrolled fires from occurring

General mitigation:

- As per the Fire Protection Management Plan (refer to section 12.2).

SECTION C: SPECIAL MANAGEMENT PLANS

10. WASTE MANAGEMENT PLAN

10.1 Preliminaries

10.1.1 Purpose of this document

As part of Kapama Private Game Reserves (hereafter referred to as "KPGR") continued commitment to environmental improvement and their duty to fulfill requirements of the National Environmental Management Act (Act 107 of 1998), the National Environmental Management: Waste Amendment Act, 2014 (Act 26 of 2014) as well as other obligatory policies and legislation; the development and implementation of a waste management plan was deemed a necessary tool.

10.1.2 Objectives of the IWMP

The overall aim and goals of the waste management plan are to:

- Reduce the overall environmental footprint of KPGR by implementing measures that will focus on preventing, reducing, reusing, recycling, composting, treatment and disposal of waste products.
- Implement formal and accountable approaches, that are of an environmentally conscience manner, to the handling, storage, transferring and disposal of waste products off KPGR premises.
- To prevent inappropriate management of waste and associated risk of pollution of the environment;
- Provide guidelines to KPGR and its contractors that will ensure waste management actions are in line with current policies and legislations.
- Define roles and responsibilities for all involved in the waste management process.
- Educate employees on wise waste management practices.
- Ensure feasible and achievable targets for waste management are set.
- Prevent avoidable mismanagement of waste and the associated risks.

10.2 Operational Overview and Waste Types

10.2.1 Property overview

KPGR is a private game reserve of 14 000 hectares in extent situated in Limpopo Province. KPGR has developed several commercial lodges throughout the Reserve, as well as, staff accommodation and other management infrastructure. The lodges offer various facilities and activities, these include but are not limited to; restaurants, spas and recreational facilities. In order to provide adequate service to guests as well as for general maintenance of the property, a number of ancillary facilities including sewage systems and maintenance facilities are also present on the property.

- Solid waste management
Solid waste generated from each lodge and staff village is separated at source into wet waste, recyclables and non-recyclables. Recyclables are separated into the various categories, namely paper, plastic, cans and glass and are stored in marked 240 litre wheeled bins. These bins are located at the back of house in a caged off area. Non-recyclables are stored in a similar manner. All recyclables and non-recyclables are then collected from the various lodges via a caged tractor-trailer and taken to the waste holding and incineration site located within KPGR. This area is fenced off. Here the recyclables are stored for collection, while the non-recyclables are incinerated. Local recycling company comes and collects the various recyclables once a week and transport it to a local recycling centre at Acornhoek.
All organic wet waste is collected two (2) times per week from River Lodge by a local pig farmer.
No part of the general solid waste can be classified as hazardous in terms of the relevant legislation.

Adjacent to the waste storage and incineration site, is an informal dumping site which appears to contain building and demolition waste. This area is not fenced off and is freely accessible to staff members and roaming animals.

- **Wastewater Management**
The four camps (4) and one (1) staff village (Drakensig) currently generates wastewater flows within Kapama Private Game Reserve. Each of the sites have their own wastewater treatment works (WWTW) which primarily consists of unlined oxidation ponds, with the exception of the Southern Camp WWTW, which has a single masonry aeration basin. The effluent from the WWTW is primarily used for irrigation.
The single oxidation pond systems employed by the various WWTW cannot produce the required effluent quality. The existing ponds, with the exception of Southern Camp, are not lined and do not meet the relative legislative requirements.

10.2.2 Waste streams

KPGR is expected to generate the following predominant waste streams:

- **General Waste**
This is classified as waste that is generated as a result of daily operations, that is not directly harmful to humans or the environment. Products falling into this group include paper, plastic, glass etc.
- **Kitchen Wastes**
Kitchen waste will be one of the largest waste generating components. It includes all food products whether it be during the preparation stage (e.g. vegetable peels) or the final stage (e.g. leftovers); however, products that will not naturally be included into the environment, such as oils and greases, will not be classified in this category.
- **Sewage Waste**
This is classified as grey (showers, baths etc.) and black (toilet) water and is made up of "contaminated" water. The possibility of harmful bacteria is probable and so can be harmful to humans and the environment if left untreated or adequate systems are not in place.
- **Landscaping**
Landscaping waste will take into account most vegetation waste which will predominantly be generated from the gardens surrounding the lodges and staff residence, this will include grass cuttings, leaves, weeds as well as trimmings from hedges and bushes. This category is predicted to produce the least amount of the total waste produced by KPGR
- **Hazardous Waste**
This is classified as any product that can have adverse impacts on the environment due to its chemical, toxicological and/or physical properties. Cleaning detergents, certain office supplies such as batteries, flammable material (gas, petrol, etc.), fluorescent lights as well as oils/grease/fat used for cooking are considered as hazardous waste.

10.3 Waste Management Plan Principles

10.3.1 Waste management hierarchy

The Hierarchy of Waste Management (HWM) (Figure 1) is the backbone of any Waste Management Plan (WMP) and provides the basic principles for an organization to sufficiently manage its waste streams while complying with their legal duty towards the environment.

The hierarchy provides different waste management strategies according to their importance and the desirability of their outcomes – the most desirable strategy is placed on the top while the strategy that is least desirable is at the bottom (Figure 1). The overall objective of the HWM is to create an IWMP where the least amount of waste product possible is generated and maximum practical benefits from the product is achieved.

Below are the waste management strategies:

- **Avoid/Prevent**
Avoidance/prevention focuses on not creating any type of waste and promotes the reduction of virgin materials extracted and used. This strategy usually targets the design and the manufacturing stage of the item and so requires a change in mindset and behavior in order for it to be successful (i.e. selecting items with less or recycled packaging). This is ranked first as it is the best and most cost effective strategy.
- **Reduce/Minimize**
In most cases avoidance of waste is not possible. In such cases reduction of waste is the next most preferred option. Reduction of waste consists of the efficient and educated use of resources that lead to less waste production. The fewer products that generate waste that are brought onto the property will result in fewer waste products that need to be removed from the property.
- **Reuse**
The reuse of materials involves using an existing item in its original form before disposing of it. If the lodges themselves can't reuse the item then it is advised that the possibility of donating or selling the material to an individual/organization that can use it be looked into.
- **Recycle/Compost**
This strategy should only be implemented once the company has reduced and reused as much of the waste products as possible. Recycling and composting of items are more difficult for a lodge to implement than the previous strategies. This strategy involves converting an existing item into a new item that may have a different use/purpose. Waste segregation and management is essential in correctly implementing a successful recycling or compost program on the lodges.
- **Dispose/Treat**
Disposal and treatment of waste is the least desirable strategy and should therefore only be used where the alternatives are not possible or when the alternatives would create a safety concern (i.e. when dealing with hazardous materials).

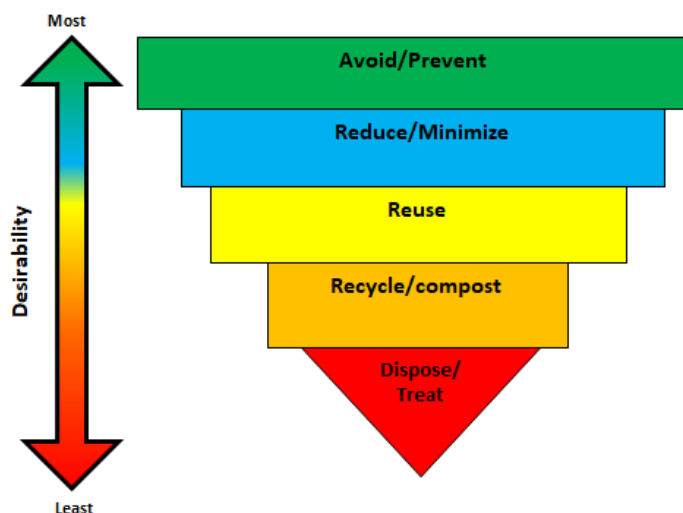


Figure 1 – Waste Management Hierarchy
10.4 Management Actions

This section details the steps that will be taken by the KPGR in order to successfully implement the IWMP. The management actions take into consideration all the principles previously discussed (HWM) and offer steps that will be taken during all stages of the waste production cycle (generation, collection, transportation, recovery and disposal) in order to reach the given objectives.

The following guidelines, recommendations and mitigation measures should be implemented and adhered to, however, it also creates a platform for continual improvement where waste is concerned.

10.4.1 Solid waste management

General waste:

General waste should be separated at source into recyclables and non-recyclables and stored safely onsite. The waste should then be transported to onsite storage areas where it can be kept until it can be transported to an approved re-cycling depot or landfill site.

The following is recommended:

- Waste at all lodges and staff village are to be separated at source into recyclables and non-recyclables and wet waste
- Waste needs to be sorted according to the licensed waste contractor's requirements.
- Waste sorting and storage to occur at designated areas at each lodge and staff village
- Recyclables are to be separated into the various categories namely, paper, plastic, cans and glass
- All sorted waste to be stored in marked 240 liter wheeled bins inclusive of wet waste and non-recyclables
- Marked bins are to be placed in strategic waste holding areas in back of house in a shaded, caged off area to prevent waste being blown into the surrounding environment and accidental ingestion by animals. These areas need to be well organized and maintained in order to prevent pests and scavengers from entering.
- All external bins throughout the lodges need to be animal proof and these bins need to be maintained and serviced on a regular basis.
- Wet waste to be collected two (2) time per week by local pig farmer.
- Recyclables and non-recyclables to be transported to main waste holding area within KPGR at least once per week, or as and when necessary.
- Recyclables and non-recyclables are to be transported via a caged tractor-trailer
- Storage and transportation of waste needs to be done in such a way that natural elements leave the waste unaffected.
- Recyclables are to be collected once a week by a local contractor and transported in a waste cage to the local recycling center at Acornhoek.
- All non-recyclables are to be collected once a week by a local contractor and transported in a waste cage to the local licensed landfill site.
- When separating general waste; containers must be emptied and cleaned, all ancillary items must be removed from the material (paper clips, plastic covers etc.)
- Safe disposal certificates must be kept on file for record.

The following general guidelines are also recommended:

- The less waste brought onto the property = the less waste to remove. The lodges should purchase materials/items in such a way that they keep this in mind. KPGR can look into drafting a purchasing policy for the lodges. This policy can look at;
 - I. Buying products with less packaging
 - II. Buying products that are more environmentally friendly
 - III. Purchasing recycled, durable and repairable products
 - IV. Purchasing biodegradable bags for waste bins
 - V. Avoid purchasing one-use, disposable items
 - VI. Minimize the use of products that produce hazardous waste

- Educate staff on waste management and KPGR's aim to reduce, reuse and recycle waste. This can be done through posters hung up in various areas or through regular staff meetings.
- Avoid and reduce the use of paper use. This can be done by trying to completely go online and eliminate the need for printing. Where this cannot be avoided use less paper by printing on both sides and using smaller fonts.
- Avoid replacing toilet rolls before they are finished where possible. If the lodges do replace toilet rolls before they are finished then these should be given to staff.
- Where possible donate useful items to staff or surrounding areas.
- Raise awareness surrounding recycling for staff and guests. This can be done through hanging posters in strategic places. Below is a table showing some of the items that can be recycled vs those that cannot be:

Material	Recyclable	Non-recyclable
Paper	<ul style="list-style-type: none"> • Newspaper • Office paper • Magazines 	<ul style="list-style-type: none"> • Laminated paper • Food wrappers • Adhesive tape
Cardboard	<ul style="list-style-type: none"> • Toilet roll tubes • Cereal boxes • Food boxes 	<ul style="list-style-type: none"> • Boxes that still contain food or liquid items
Glass	<ul style="list-style-type: none"> • Food and drink containers 	<ul style="list-style-type: none"> • Ceramics • Window glass • Containers that still have food or liquids in.
Metal	<ul style="list-style-type: none"> • Steel food cans • Metal container lids 	<ul style="list-style-type: none"> • Cans containing hazardous materials • Power tools • Silverware • Aerosol cans
Plastic	<ul style="list-style-type: none"> • Cling wrap • Polystyrene items 	<ul style="list-style-type: none"> • Soft plastic containers (eg. Milk bottles) • Hazardous waste containers

Kitchen waste:

Kitchen waste will be one of the largest waste generating components at the lodges and staff village. In the case of KPGR, food waste from the kitchens are given to a nearby pig farmer. This allows for the waste handling system to be simplified in terms of the fact that pig farmer can accept a wider variety of waste products as opposed to composting systems.

The following is recommended for the non-hazardous kitchen waste products generated at KPGR:

- Kitchen waste to be separated into the following waste streams:
 - Organic waste that is not classified as hazardous.
 - Recyclable items –nonfood items that are generated in the kitchen. This will essentially be made up of the packaging of the food items (see requirements for general waste above)
 - Hazardous waste – This will include food sources classified as hazardous (oils, fats and greases) as well as chemical cleaning products.
- Waste sorting and storage to occur at designated areas at each lodge and staff village
- All sorted waste to be stored in marked 240 liter wheeled bins inclusive of wet waste and non-recyclables
- Marked bins are to be placed in strategic waste holding areas in back of house in a shaded, caged off area to prevent waste being blown into the surrounding environment and accidental ingestion by animals. These areas need to be well organized and maintained in order to prevent pests and scavengers from entering.
- All external bins throughout the lodges need to be animal proof and these bins need to be maintained and

serviced on a regular basis.

- Non-hazardous organic kitchen waste to be collected by the local pig farmer at least twice a week to reduce the chance of bad odour and health reasons.
- Grease traps need to be installed in kitchens for the reliability of the system and adequate separation of hazardous materials.
- Look into the feasibility of using more environmentally friendly cleaning products.
- Freeze and preserve fresh produce where possible and use certain left-overs such as vegetable peels and meat scraps to make stocks and soups.
- Avoid purchasing large amounts of fresh produce that cannot be frozen or preserved.

Hazardous waste:

Hazardous waste can be detrimental to an environment and therefore disposal of such needs to be done with the utmost care. Hazardous waste can be divided into; chemical waste, used oil waste, oil contaminated waste, used cooking oils, fats and greases, paint waste, fluorescent bulb waste, battery waste and e-waste.

The following recommendations are provided for the lodge operators to choose the best practicable option:

- Ideally hazardous waste needs to be reduced as much as possible. This can be done by;
 - I. Educating staff on KPGR's aim to reduce hazardous waste production.
 - II. Avoid contamination of the surrounding environment. This should be done through insuring adequate, durable containers, fitting the required description are used and that these containers are routinely inspected and maintained.
 - III. Looking into drafting a purchasing policy to try purchase non-hazardous alternatives where possible. Housekeeping, pool products and paint products can all be replaced with organic certified, eco-friendly products.
 - IV. Battery use should be limited and where possible solar-powered items should be used.
 - V. When looking at fluorescent lighting; use bulbs with the longest lifespan, encourage all to use natural lighting wherever possible, make sure all lights can be switched off manually, look into presence detectors for lights in areas that aren't used a lot. KPGR should investigate replacing all bulbs with LEDs.
- Hazardous waste should be separated at the source from the general waste stream. This will prevent the chance of cross contamination therefore decreasing the risk to staff and the environment.
- If possible contaminated equipment should be appropriately cleaned of all hazardous materials in order for equipment to be recycled with non-hazardous waste.
- Liquid hazardous waste to be stored in enclosed, bunded areas.
- The bund must have a volume of 10% of the volume of the largest tank in the storage area plus 10% of the volume of all other tanks.
- The slab must be sloped towards a sump to enable any spilled fuel and water to be removed.
- Any wastewater collected at the sump shall be disposed of as hazardous waste.
- All hazardous waste containers should be clearly labeled with the product within the container as well as the volume the container can hold. Personal protective equipment (PPE) required during handling the product should also be clearly stated on the container.
- Hazardous waste containers should be stored in an area where they are protected from the elements but can be reached with the transport vehicle.
- Used oil and oil contaminated materials should be stored away from any watercourse in an impermeable bunded container that is sealed with a roof.
- Sufficient absorbent spill cleanup kits should be placed nearby the used oil waste storage area.
- Hazardous waste such as oil, batteries and light bulbs can and should be recycled through a reputable licensed agent or returned to supplier.
- KPGR needs to continuously evaluate its waste production streams and identify any new waste product that may be classified as hazardous and then implement a system for the safe disposal of it.
- Hazardous waste should be handled in such a way that it does not become an environmental, health or safety hazard.

- Hazardous material storage areas must be constructed of an impermeable bund.
- Used cooking oil must be kept separate from fats and greases that are extracted from kitchen fans and filters as used cooking oils can be recycled.
- The recommended personal protective equipment (PPE) should always be utilized by those handling hazardous waste.
- All service providers handling hazardous waste (transportation and disposal) must be suitably qualified and hold the relevant permits and licenses.
- A safe disposal certificate should be issued by the waste management service provider to the lodge when hazardous waste is removed from the premises. This certificate should be kept on record for if it is needed by environmental authorities.
- When disposing hazardous waste it is essential to comply with all regulations and standards regarding it.
- Vehicles transporting hazardous waste must comply with all regulations.

Landscaping:

Landscaping waste takes into account most vegetation waste which will predominantly be generated from the landscaping surrounding the lodges, staff village and housing which includes grass cuttings, leaves, weeds as well as trimmings from hedges and bushes. It should be noted that KPGR generates a very small quantity of landscaping waste as most of the areas surrounding the lodges are vegetated with natural veld grasses and vegetation.

The following recommendations can be used with regard to landscape waste:

- Landscaping waste should be shredded/cut up and onsite compost facilities should be considered.
- Composting activities will reduce the organic waste stream and also reduce the maintenance costs of the gardens (no need to buy fertilizers and mulch).

Waste storage areas:

KPGR must maintain the intermediate waste storage areas so that they comply with all safe storage requirements and in doing so, allowing for adequate and safe storage of waste prior to the removal offsite.

The following is recommended:

- Where possible the generated waste should be directly transported from the point of generation to a designated waste storage area i.e. initially to storage areas at the back of house and then at the larger storage area from where collection takes place.
- Waste storage areas should be of a sufficient size and be able to comfortably accommodate all waste produced by KPGR.
- Waste storage containers must be intact and in good condition.
- The floors of the waste storage areas should be designed in such a way that water is directed away from the waste containers.
- Waste storage containers should be clearly marked with what should go into them.
- Durable walls/fences should enclose the waste storage areas. These should be at least the height of the containers, with gates/doors of the same size that open from both sides.
- The storage and transportation of waste should be done in such a way that the intervention from natural elements (such as wind) is planned for and avoided.
- Waste cages should be used for all transportation and storage of waste areas as this will limit the impact caused by natural elements as well as minimizing the chances of animals getting into the sights.
- A separate designated area should be used for storage of hazardous waste. This area should comply with the following requirements:
 - I. Surrounded by an impermeable bund capable of containing 110% of the total volume of waste stored at any given time. One side of the bund should comprise a ramp to allow vehicle access.
 - II. Should be clearly labelled with "Hazardous Waste", the capacity of the bund

storage area as well as the personal protective equipment (PPE) that should be used when handling the material.

- Regular maintenance and cleaning of waste storage areas is essential.

KPGR should continually assess waste production and ensure no new requirements are required for handling and storage of waste. Currently the legal compliance for waste storage areas:

- Storage volumes for General Waste should not exceed 100m³ unless a Waste Management License has been granted.
- Storage volumes for Hazardous Waste should not exceed 35m³ unless a Waste Management License has been granted.

Off-site (landfill) disposal:

The IWMP aims to reduce the total amount of waste generated by KPGR, particularly that of the waste that will be disposed of to landfills, however, there will still be a portion that will need to be disposed of in a permitted landfill site. The closest permitted landfill site to KPGR is Maruleng Waste Disposal Site in Hoedspruit.

When dealing with landfill disposal it is detrimental to adhere to the following principles:

- Ensure the legal requirements and policies regarding waste transportation and storage are met. This means that only reputable waste transport companies should be used and that the waste disposal facilities all have permits.
- Waste types and quantities need to be recorded as accurately as possible, this will allow for future improvements as well as for reporting purposes. All lodges should adopt a system of recording and filing this information.
- If a contractor is involved with the transportation of waste, this contractor needs to be suitably qualified and a letter stating agreement needs to be kept on file.

10.4.1 Wastewater management

In order to produce the required effluent quality and meet the legislative requirements as set out in the National Water Act (Act No 36 of 1998), it has been recommended new WWTW be constructed for each of the four (4) lodges and staff village. The existing ponds at each lodge will be capped and the areas rehabilitated.

New waste water treatment works will be constructed at River Lodge, Buffalo Camp, Karula and Southern Camp, as well as, at the Drakensig Staff Village. The WWTW proposed is the Moving bio-bed Reactor. This system consists of two reactor tanks with the bacteria required for the process, fixed on carrier media, and a clarifier and is fully automated.

The MBBR process utilizes floating plastic carriers (media) within the aeration tank to increase the amount of microorganisms available to treat the wastewater.

The treatment process is broken down into the following phases:

- Supply of raw effluent to the plants
Existing pumps will pump the sewage from various sources to the new treatment plant sites
- Pre-treatment
For each of the pumped lines there is already a grit and solids removal structure in place. Grit is removed on a regular basis and disposed as per regulation as solid waste. The other organic solids accumulate in the septic tanks where it biodegrades and the semi-stabilized sludge is pumped from time to time by Honey Sucker and disposed on the existing drying beds. Dry sludge is raked together and mixed with grass cuttings to make compost which is then used in gardens.
- Balancing Tank

There will be a balancing tank at each plant, big enough to take a full one hour of a sustained peak of 6x ADWF.

- Treatment Process

An ultrasonic inlet flow meter provides flow records and is used to automatically adjust the chemical dosing rates according to flow.

The first treatment stage is the anaerobic section. This is necessary for the removal of phosphates. The second stage is the anoxic reactor. In this reactor, nitrified effluent (nitrate) is converted to Nitrogen gas that escapes, while the bacteria utilizes the organics in the effluent simultaneously. This reactor is mixed with a small electrical mixer. The third stage is an aerated tank, where the organic material and ammonia is converted. Aeration is done with a blower. All the reactors contain the special bio-carrier media. There is a recycling pump that recycle process water from the 3rd to the 2nd stage to enhance nitrogen removal.

- Clarification

The last stage consists of a high rate clarifier with inclined media. In this stage the fine biomass is separated and settles to the bottom the conical clarifier. The water overflowing here is very close to general standards, except that the TSS might still be high. Sludge is withdrawn periodically by an automatic sludge valve and is discarded to the sludge drying bed.

- Sludge handling

Sludge drying beds will be constructed. Dried sludge will be raked off and mixed with a bulking agent like cut grass to make compost.

- Final Chlorination

The clarified water is chlorinated and gravitates to a treated water tank that acts as chlorine contact tank. The minimum contact time is 20 minutes. The overflow of this tank will then irrigated.

In order to irrigate the final effluent, it is proposed that a sand filter be provided to remove any residual suspended solids prior to irrigation. In addition to this Granular Activated Carbon filters should also be installed, upstream of the final disinfection. If phosphates removal is necessitated, then ferric chloride dosing can be incorporated upstream of the filters.

General:

- Sewage systems must be of a standard to be able to sufficiently handle effluent quantities produced by all the various sites
- Effluent quality needs to be assessed on a regular basis and needs to comply with General Standards.
- Only suitably qualified personnel should operate and maintain the sewage treatment works.
- Replace existing pump stations with a single pump station.
- A small screening structure and grit trap should be installed at each WWTW for the protection of pumps
- Primary ponds need to be de-sludged on a every 15 years or sooner if required.
- The septic tanks at all lodges and staff village to be de-sludged periodically (e.g. every 3-5 years), by an approved sludge removal contractor.

Irrigation with treated waste water:

- Waste water to be used as irrigation, must comply with the following quality requirements:
 - pH levels between 5.5-9.5
 - EC must not exceed 70 mS/m
 - Suspended solids must be less than 25 mg/l

- Chlorine does not exceed 0.25 mg/l
- Fluoride does not exceed 1 mg/l
- Soap, oil, grease does not exceed 2.5 mg/l
- Chemical oxygen demand does not exceed 75 mg/l
- Faecal coliforms do not exceed 1000 per 100 ml
- Ammonia does not exceed 3 mg/l
- Nitrate/Nitrite does not exceed 15 mg/l
- Phosphorus does not exceed 10 mg/l
- Sand filter be provided to remove any residual suspended solids prior to irrigation.
- Granular Activated Carbon filters should also be installed, upstream of the final disinfection.
- Irrigation may only take place above the 100 year flood line or at a distance greater than 100 meters from the edge of a water resource or borehole which is used for drinking water, whichever is the greatest.
- No contamination of ground- or surface water may take place.
- KPGR must measure the quantity of wastewater irrigated on a weekly basis.
- KPGR must measure the quality of the irrigated wastewater on a monthly basis. Samples should be drawn from the irrigation system from a point located immediately prior to the emitters.
- Solid particles must be removed before irrigation and disposed of safely and efficiently.
- Stormwater (rain water) originating from the irrigation area must be collected to prevent contamination of any surface water resource.

Specific recommendations:

KPGR has four lodges and one staff village that contribute towards sewage. The following are recommended for each lodge:

- River Lodge
 - A small screening structure and grit trap should be installed at each WWTW for the protection of pumps
 - Investigate the possibility of replacing the existing pump stations with a single pump station.
 - Install a pressure Granular Activate Carbon (GAC) filter downstream of the sand filters
- Drakensig
 - Investigate the possibility of gravitating the flow as an alternative to the use of pump stations.
 - A small screening structure and grit trap should be installed at each WWTW for the protection of pumps
- Southern Camp
 - French drains to be decommissioned and septic tanks connected to the sewer network.
 - Filter media to be replaced on a regular basis to avoid saturation.
 - A small screening structure and grit trap should be installed at each WWTW for the protection of pumps
- Buffalo Camp
 - A small screening structure and grit trap should be installed at each WWTW for the protection of pumps
- Karula
 - A small screening structure and grit trap should be installed at each WWTW for the protection of pumps
 - Flow generated from the lodge can be gravitated to a central, downstream point. In order to reduce the maintenance and operations requirements, it is recommended to replace all the existing pump stations with a single pump station.

- The eight (8) French drains need to be decommissioned and the septic tanks must be connected to the sewer network.

11. STORM WATER MANAGEMENT PLAN

The purpose of the Storm Water Management Plan is to provide general guidelines and principles for the management of storm water during both the construction and operational phase. This is done to ensure minimal erosion and ecological damage as a result of increased volumes of storm water and runoff from hard surfaces (roofs, roads, paving etc.).

As this section forms part of the EMP, the overall responsibility of ensuring compliance with the Storm Water Management Plan ultimately lies with the applicant.

11.1 Construction Phase

Implement and maintain a storm water management system for the facility. In general, the following measures are recommended:

- The protective buffer around the watercourses must be respected as it acts as a trap for sediment and contaminants. Measures must be put in place around sensitive areas to protect these from sediment and contaminants.
- Make use of erosion control measures to minimise erosion at excavation / clearing sites or aggregate storage sites. Earth moving construction activities to take place in dry season as far as possible.
- Remove only vegetation essential for construction and do not allow any disturbance to the adjoining natural vegetation cover.
- Ensure that measures are in place to control the flow of excess water so that it does not impact on the surface vegetation.
- The accumulation of water on the surface should be prevented. The drainage of the surface should be done in such a way that storm water will be led away quickly and efficiently without any erosion taking place.
- Do not allow surface water or storm water to canalize or be concentrated.
- Storm water outflows should not be allowed to enter directly into watercourses.
- Runoff from roads must be managed to avoid erosion and pollution problems.
- Place and maintain erosion control barriers as appropriate to prevent sedimentation.
- Prevent storm water or contaminated water directly entering any watercourse.
- Install waste traps to catch litter conveyed by surface runoff.
- All waste traps within the storm water system will be emptied / cleaned regularly to ensure their efficient functioning.
- Dissipate concentrated storm water flows through energy dissipaters or vegetated areas.
- Proactively protect steep access roads, cuttings against and other areas susceptible to erosion by installing all the necessary temporary and permanent drainage works as soon as possible and by taking such other measures as may be necessary to prevent surface water being concentrated in water sources and from scouring the slopes, banks or other areas.
- Repair all erosion damage as soon as possible. Do not allow erosion to develop on a large scale before effecting repairs.
- The stabilisation of disturbed areas, access roads and / or steep cuttings is very site specific and could include reno mattresses, mitre drains, drainage pipes, benches, gabions; scarifying (ripping) areas along the natural contours or packing branches and rocks.
- Monitor all rehabilitated areas for at least a year following the completion of rehabilitation works for failure of vegetation to establish and / or erosion. Immediately implement remedial measures as required.

11.2 Operational Phase

Maintain the storm water management system for the facility on an ongoing basis and ensure that this is always in good working order. The following is of relevance:

- All activities that affect surface drainage should be designed so as to ensure that storm water runoff does not lead to excessive surface erosion problems on the site.
- Porous paving surfaces should be used in place of hard paved surfaces in order to promote and encourage the infiltration of storm water.
- The protective buffer around the watercourses must be respected as it acts as a trap for sediment and contaminants. Measures must be put in place around sensitive areas to protect these from sediment and contaminants.
- Ensure that measures are in place to control the flow of excess water so that it does not impact on the surface vegetation.
- The accumulation of water on the surface should be prevented. The drainage of the surface should be done in such a way that storm water will be led away quickly and efficiently without any erosion taking place.
- Do not allow surface water or storm water to canalize or be concentrated.
- Runoff from roads must be managed to avoid erosion and pollution problems.
- Place and maintain erosion control barriers as appropriate to prevent sedimentation.
- Prevent storm water or contaminated water directly entering any watercourse.
- Install waste traps to catch litter conveyed by surface runoff.
- All waste traps within the storm water system will be emptied / cleaned regularly to ensure their efficient functioning.
- Dissipate concentrated storm water flows through energy dissipaters or vegetated areas.
- Repair all erosion damage as soon as possible. Do not allow erosion to develop on a large scale before effecting repairs.
- Monitor all rehabilitated areas for at least a year following the completion of rehabilitation works for failure of vegetation to establish and / or erosion. Immediately implement remedial measures as required

12. FIRE PROTECTION MANAGEMENT PLAN

The National Veldt and Forest Fire Act (Act No. 101 of 1998) deals with the prevention and combat of veld, forest and mountain fires throughout South Africa, and should be adhered to at all times. This Act provides guidelines regarding fire break preparation and maintenance, the equipment needed for fighting fires and availability of personnel during fire emergencies, the roles and responsibilities of persons and officials during fire emergencies, the offences and penalties, as well as the powers of registered fire protection officers and law enforcement.

In terms of the National Veld and Forest Fire Act 101 of 1998 there is a restriction on the making of fires, in that no fires may be made without a permit.

Both the National Environmental Management (NEMA): Protected Areas Act, 57/2003 and National Veld Forest Fire Act are very clear on the penalties (fines, imprisonment or both) and/or disciplinary action which may be imposed on persons who are found guilty of not complying with the laws stipulated.

12.1 Construction Phase

The following is applicable during the construction phase:

- All Contractors must take all the necessary precautions to ensure that fires are not started as a result of activities on site.
- No open fires will be permitted anywhere on site.
- No incineration or burning of waste will be permitted anywhere on site.
- Provide personnel and staff with gas for cooking purposes in demarcated, safe areas within the construction camp.
- Establish and maintain a fire break around the perimeter of all construction sites prior to the commencement of construction activities.
- All Contractors should contact all of the adjacent farm owners prior to the commencement of the construction phase and ensure that he/she has the contact numbers so that they can be contacted in the event of a fire.
- All Contractors to ensure that construction related activities that pose a potential fire risk, such as welding, are properly managed and are confined to areas where the risk of fires has been reduced.
- Measures to reduce the risk of fires include clearing working areas and avoiding working in high wind conditions when the risk of fires is greater. In this regard special care should be taken during the high risk dry, winter months.
- All Contractors shall supply all site offices, kitchen areas, workshop areas, material stores and any other areas identified with suitable, tested and approved fire-fighting equipment.
- All equipment shall be maintained in good operating order.
- All Contractors to provide fire-fighting training to selected construction staff.
- In the event of a fire being caused by construction workers and or construction activities, the appointed contractors must compensate private landowners for any damage caused by the fire. The contractor should bear the costs associated with fighting the fire
- All Contractors to ensure that the necessary firefighting equipment is on site in accordance with relevant legislative requirements.

12.2. Operational Phase

The following general fire management actions apply throughout the operational phase of the facility:

- No incineration or burning of waste is permitted within the Reserve.
- Establish and maintain a fire break around the perimeter of River Lodge.
- Lines of communication should be maintained with all of the adjacent farm owners so that they can be contacted in the event of a fire.
- Fire-fighting training is to be provided to selected operational staff.
- Management is to ensure that the necessary firefighting equipment is on site in terms of relevant legislative requirements.
- Staff members or the persons who give the instruction to light a fire without complying with the abovementioned regulations will be subjected to disciplinary action and may also face criminal charges in terms of the Veld and Forest Fire Act 101 of 1998.

REFERENCES

Cultural Heritage Impact Assessment: Phase 1 Investigation for Proposed Extensions to River Lodge in Kapama Private Game Reserve, Maruleng Local Municipality, Mopani District Municipality, Limpopo Province. FP Coetzee, 2018.

Cultural Heritage Impact Assessment: Phase 1 Investigation for the Development of Lodges, Roads and other Tourist Infrastructure in Kapama Private Game Reserve, Maruleng Local Municipality, Mopani District Municipality, Limpopo Province. FP Coetzee, 2019.

Environmental Best Practice Specifications: Construction for Construction Sites, Infrastructure Upgrades and Maintenance Works. Department of Water Affairs and Forestry, 2005.

Kapama Lodge: Baseline Terrestrial Ecology Study and Biodiversity Value Assessment. Ecorex Consulting Ecologists CC, 2018.

Kapama Game Reserve: Terrestrial Ecological Assessment. Ecorex Consulting Ecologists CC, 2019.

APPENDICES

Appendix A: Curriculum Vitae of the Environmental Assessment Practitioner

APPENDIX A: CURRICULUM VITAE OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER

CURRICULUM VITAE BRYONY PAIGE VAN NIEKERK

PERSONAL INFORMATION

Full Name:	Bryony Paige van Niekerk
Date of Birth:	1987-06-21
Gender:	Female
Identity number:	8706210115089
Nationality:	South African
Race:	White
Language(s):	English and Afrikaans (written and spoken)
Marital Status:	Single
Dependents:	0
Drivers License:	Code 08
Residential Address:	207 The Globe, Paramount Estate, Monroe Close, Silver lakes, Pretoria
Postal Address:	PO Box 1456 Garsfontein, Pretoria, 0081
Telephone number:	074 818 9788
Email address:	bryony@nuleafsa.co.za

FORMAL EDUCATION

Date	Qualification	Institution
2005	Grade 12	Pretoria High School for Girls
2012	Bachelor of Science in Natural Sciences: Chemistry and Zoology Stream	University of South Africa
2015	Bachelor of Science Honours in Environmental Management	University of South Africa

TECHNICAL SKILLS

Software	Skill level
MS Word	proficient
MS Excel	proficient
MS Outlook	proficient
MS PowerPoint	proficient
Internet operation and navigation	proficient
CorelDRAW	proficient

BRIEF SUMMARY OF CORE COMPETENCIES

Bryony has an Honors Degree in Environmental Management, and 5 years of experience. Bryony has specialized in Environmental Planning and Management, with specific expertise in Bioregional Planning, Environmental Impact Assessments and Environmental Management Planning.

CAREER HISTORY

Date	Company / Organisation	Position
2015 - present	Nuleaf Planning and Environmental (Pty) Ltd	Environmental Practitioner
2013-2014	Ecotourism Solutions	Project Administrator

DRAFT ENVIRONMENTAL MANAGEMENT PROGRAMME

RELEVANT WORK EXPERIENCE (KEY PROJECTS)

(All projects in South Africa unless otherwise stated)

COMPANY	YEAR	PROJECT NAME	CLIENT	DESCRIPTION OF DUTIES
Nuleaf Planning & Environmental	2018	Lapalala Staff Accommodation	Lapalala Wilderness Pty Ltd	Environmental Practitioner
Nuleaf Planning & Environmental	2018	Sekhukhune District: Bioregional Plan	Limpopo Province Department of Economic Development, Environment and Tourism	Team Leader, Project coordinator
Nuleaf Planning & Environmental	2018	Capricorn District: Bioregional Plan	Limpopo Province Department of Economic Development, Environment and Tourism	Team Leader, Project coordinator
Nuleaf Planning & Environmental	2018	Lapalala Custodians	Various	Environmental Control Officer
Nuleaf Planning & Environmental	2017	Proposed Establishment of an Aquaculture Development Zone in Amatikulu, KZN	Department of Agriculture, Forestry and Fisheries	Environmental Practitioner
Nuleaf Planning & Environmental	2017	Tenbosch Lodge / Resort Basic Assessment Process	Roosmaryn Boerdery (Edms) Bpk	Environmental Practitioner
Nuleaf Planning & Environmental	2017	Vhembe District: Bioregional Plan	Limpopo Province Department of Economic Development, Environment and Tourism	Team Leader, Project coordinator
Nuleaf Planning & Environmental	2017	Application for Proclamation as Protected Area: Lapalala Wilderness Private Game Reserve	Lapalala Wilderness Pty Ltd	Environmental Practitioner
Nuleaf Planning & Environmental	2017	Application for Proclamation as Protected Area: Kapama Private Game Reserve	Kapama Private Game Reserve	Environmental Practitioner
Nuleaf Planning & Environmental	2017	Moses Kotane District Municipality: Integrated Environmental Management Plan	Moses Kotane District Municipality	Environmental Practitioner
Nuleaf Planning & Environmental	2017	Amendment: Hans Hoheisen Wildlife Research Station	University of Pretoria	Environmental Practitioner
Nuleaf Planning & Environmental	2016	Basic Assessment for the proposed Lapalala Custodian Sites and Management Infrastructure	Lapalala Wilderness Pty Ltd	Environmental Practitioner
Nuleaf Planning & Environmental	2016	Monate Game Reserve Application for Proclamation	Monate Game Reserve	Environmental Practitioner
Nuleaf Planning & Environmental	2016	Section 24G Application for the Lapalala Private Game Reserve	Lapalala Private Game Reserve	Environmental Practitioner
Nuleaf Planning & Environmental	2016	Basic Assessment for the proposed Sebele	Barokologadi Community Property Association	Environmental Practitioner

DRAFT ENVIRONMENTAL MANAGEMENT PROGRAMME

Environmental		Game Lodge		
Nuleaf Planning & Environmental	2015	Basic Assessment for the proposed Bhundu Inn Hotel	Paul Mojapelo	Environmental Practitioner
Nuleaf Planning & Environmental	2015	Mopani District: Bioregional Plan	Limpopo Province Department of Economic Development, Environment and Tourism	Project coordinator
Nuleaf Planning & Environmental	2014	Basic Assessment for the proposed spa at Bakubung Lodge, Pilanesberg Game Reserve	Pilanesberg Resorts Pty Ltd	Environmental Practitioner
Nuleaf Planning & Environmental	2014	Basic Assessment for the proposed Malelane Safari Lodge, Kruger National Park	Malelane Safari Resort Investments Pty Ltd	Environmental Practitioner
Nuleaf Planning & Environmental	2014	Basic Assessment for the proposed upgrades to the Maropeng Interpretation Centre	GAPP	Environmental Practitioner