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PROPOSED CONSTRUCTION OF THE SOETWATER FACILITY  
SUBSTATION COMPLEX, AND ANCILLARIES NEAR SUTHERLAND,  
NORTHERN CAPE

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DRAFT ENVIRONMENTAL MANAGEMENT PROGRAMME

Submitted as part of the Basic Assessment Report

October 2015

Prepared for:

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## PROJECT DETAILS

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<b>Title</b>	:	Environmental Management Programme for the proposed construction of the Soetwater Facility Substation complex and ancillaries near Sutherland, Northern Cape
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## DEFINITIONS AND TERMINOLOGY

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**Alien species:** A species that is not indigenous to the area or out of its natural distribution range.

**Alternatives:** Alternatives are different means of meeting the general purpose and need of a proposed activity. Alternatives may include location or site alternatives, activity alternatives, process or technology alternatives, temporal alternatives or the 'do nothing' alternative.

**Ambient sound level:** The reading on an integrating impulse sound level meter taken at a measuring point in the absence of any alleged disturbing noise at the end of a total period of at least 10 minutes after such meter was put into operation.

**Assessment:** The process of collecting, organising, analysing, interpreting and communicating information which is relevant.

**Biological diversity:** The variables among living organisms from all sources including, terrestrial, marine and other aquatic ecosystems and the ecological complexes they belong to.

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

**Cumulative impacts:** Impacts that result from the incremental impact of the proposed activity on a common resource when added to the impacts of other past, present or reasonably foreseeable future activities (e.g. discharges of nutrients and heated water to a river that combine to cause algal bloom and subsequent loss of dissolved oxygen that is greater than the additive impacts of each pollutant). Cumulative impacts can occur from the collective impacts of individual minor actions over a period of time and can include both direct and indirect impacts.

**Direct impacts:** Impacts that are caused directly by the activity and generally occur at the same time and at the place of the activity (e.g. noise generated by blasting operations on the site of the activity). These impacts are usually associated with the construction, operation or maintenance of an activity and are generally obvious and quantifiable.

**Disturbing noise:** A noise level that exceeds the ambient sound level measured continuously at the same measuring point by 7 dB or more.

**Ecosystem:** A dynamic system of plant, animal and micro-organism communities and their non-living environment interacting as a functional unit.

**Endangered species:** Taxa in danger of extinction and whose survival is unlikely if the causal factors continue operating. Included here are taxa whose numbers of individuals have been reduced to a critical level or whose habitats have been so drastically reduced that they are deemed to be in immediate danger of extinction.

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

**Environment:** the surroundings within which humans exist and that are made up of:

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

**Environmental Impact:** An action or series of actions that have an effect on the environment.

**Environmental impact assessment:** Environmental Impact Assessment (EIA), as defined in the NEMA EIA Regulations and in relation to an application to which scoping must be applied, means the process of collecting, organising, analysing, interpreting and communicating information that is relevant to the consideration of that application.

**Environmental management:** Ensuring that environmental concerns are included in all stages of development, so that development is sustainable and does not exceed the carrying capacity of the environment.

**Environmental Management Programme:** A plan that organises and co-ordinates mitigation, rehabilitation and monitoring measures in order to guide the implementation of a proposal and its on-going maintenance after implementation.

**Environmental assessment practitioner:** An individual responsible for the planning, management and coordinating of environmental management plan or any other appropriate environmental instruments introduced by legislation.

**Habitat:** The place in which a species or ecological community occurs naturally.

**Hazardous waste:** Any waste that contains organic or inorganic elements or compounds that may, owing to the inherent physical, chemical or toxicological characteristics of that waste, have a detrimental impact on health and the environment (Van der Linde and Feris, 2010;pg 185).

**Indigenous:** All biological organisms that occurred naturally within the study area prior to 1800

**Indirect impacts:** Indirect or induced changes that may occur as a result of the activity (e.g. the reduction of water in a stream that supply water to a reservoir that supply water to the activity). These types of impacts include all the potential impacts that do not manifest immediately when the activity is undertaken or which occur at a different place as a result of the activity.

**Interested and Affected Party:** Individuals or groups concerned with or affected by an activity and its consequences. These include the authorities, local communities, investors, work force, consumers, environmental interest groups and the general public.

**Pollution:** A change in the environment caused by substances (radio-active or other waves, noise, odours, dust or heat emitted from any activity, including the storage or treatment or waste or substances.

**Rare species:** Taxa with small world populations that are not at present Endangered or Vulnerable, but are at risk as some unexpected threat could easily cause a critical decline. These taxa are usually localised within restricted geographical areas or habitats or are thinly scattered over a more extensive range. This category was termed Critically Rare by Hall and Veldhuis (1985) to distinguish it from the more generally used word "rare".

**Red data species:** Species listed in terms of the International Union for Conservation of Nature and Natural Resources (IUCN) Red List of Threatened Species, and/or in terms of the South African Red Data list. In terms of the South African Red Data list, species are classified as being extinct, endangered, vulnerable, rare, indeterminate, insufficiently known or not threatened (see other definitions within this glossary).

**Significant impact:** An impact that by its magnitude, duration, intensity or probability of occurrence may have a notable effect on one or more aspects of the environment.

**Waste:** (a) any substance, material or object, that is unwanted, rejected, abandoned, discarded or disposed of, or that is intended or required to be discarded or disposed of, by the holder of that substance, material or object, whether or not such substance, material or object can be re-used, recycled or recovered and includes all wastes as defined in Schedule 3 to the National Environmental Management: Waste Act, 2008 (Act 59 of 2008) (as amended) (NEM:WA); or (b) any other substance, material or object that is not included in schedule 3 that may be defined as a waste by the Minister by notice in the Gazette, but any waste or portion of waste, referred to in paragraphs (a) and (b), ceases to be a waste— (i) once an application for its re-use, recycling or recovery has been approved or, after such approval, once it is, or has been re-used, recycled or recovered; (ii) where approval is not required, once a waste is, or has been re used, recycled or recovered; iii) where the Minister has, in terms of section 74, exempted any waste or a portion of waste generated by a particular process from the definition of waste; or iv) where the Minister has, in the prescribed manner, excluded any waste stream or a portion of a waste stream from the definition of waste.

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## PROJECT DETAILS

## CHAPTER 1

It is Soetwater Wind Farm (Pty) Ltd.'s intention to develop the authorised Soetwater Wind Energy Facility (Department of Environmental Affairs' Ref: 12/12/20/2370/2) a Preferred Bidder project in terms of the Department of Energy's Renewable Energy Independent Power Producer Procurement Process (REIPPPP) Bid Window (Round) Four. In order to connect and evacuate the power from the Soetwater Wind Energy Facility into the National Eskom grid, the following infrastructure (the "Project") will be required:

- » Construction of the Soetwater Facility Substation Complex (approximately 120m x 60m) and ancillaries (including a metering station, control building, admin building, workshop and associated infrastructure).

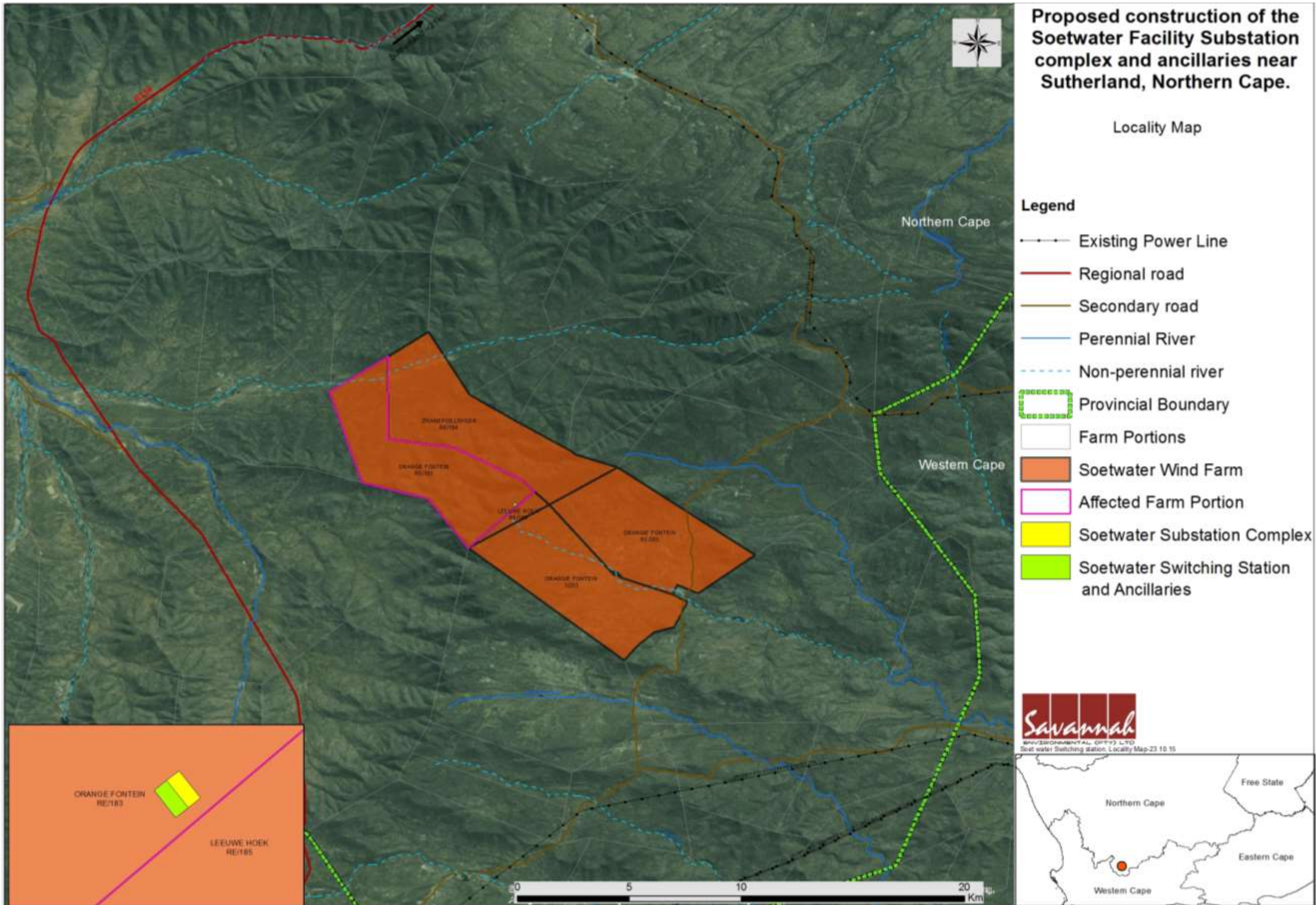
### Site Location

The following property will be affected by the construction of the proposed Project (refer to Table 1.1): Remainder of the Farm Leeuwe Hoek 183.

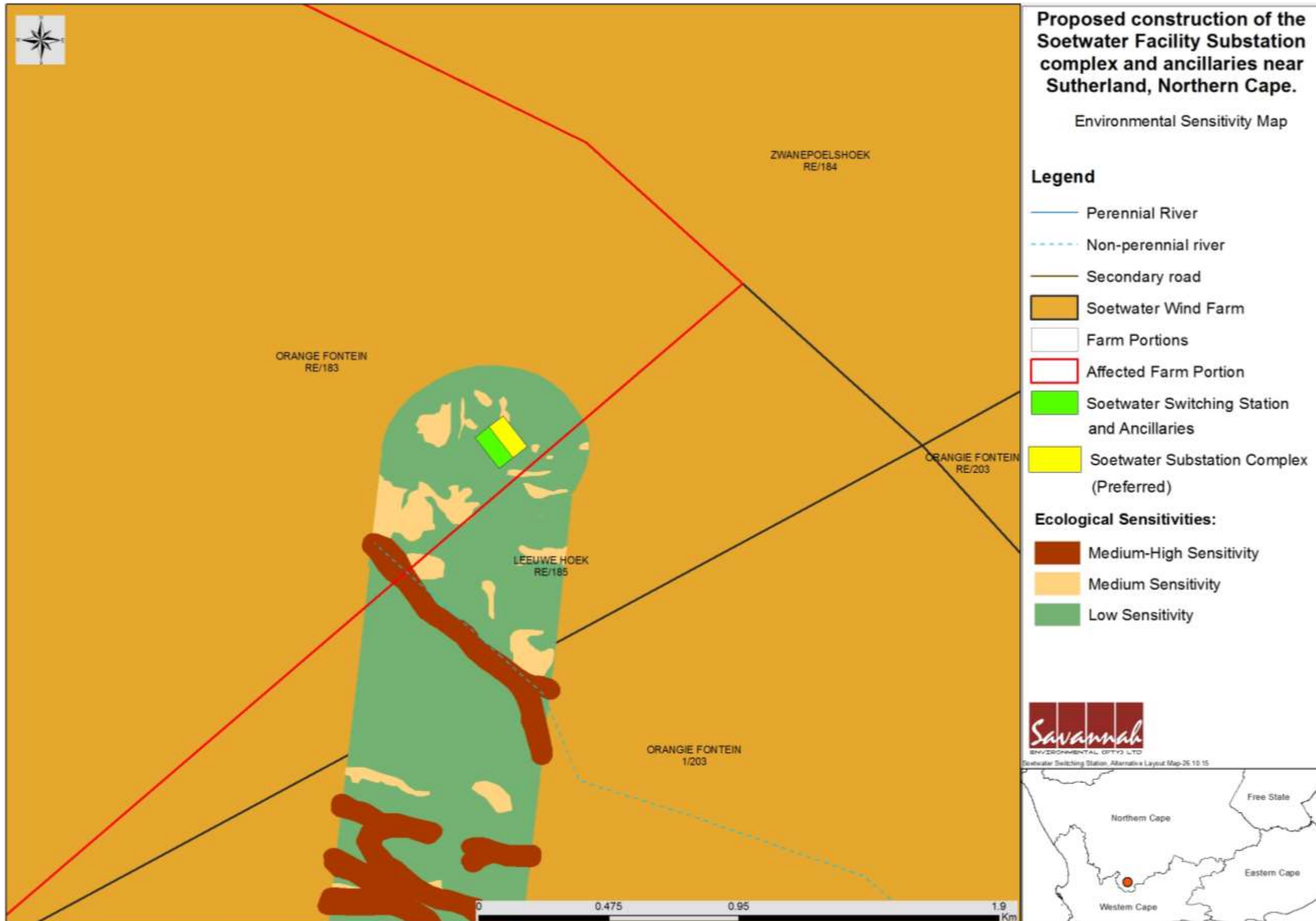
**Table 1.1:** Location of the study area

Province	Northern Cape Province
District Municipality	Namakwa District Municipality
Local Municipality	Karoo Hoogland Local Municipality
Ward number(s)	Ward 4 - Karoo Hoogland Local Municipality
Nearest town(s)	~30km north of Matjiesfontein and ~50 km south of Sutherland
Farm name(s) and number(s)	Remainder of the Farm Leeuwe Hoek 183
SG 21 Digit Code	C0720000000018300000

This Environmental Management Programme (EMPr) has been prepared as part of the Basic Assessment process for the proposed Project near Sutherland, Northern Cape.



**Figure 1.1:** Locality Map indicating the proposed development footprint



**Figure 1.2:** Sensitivity map indicating the initially authorised Soetwater Wind Farm, Facility Substation location

## 1.1. Potential impacts

Through the assessment of impacts associated with the proposed construction of the Project, undertaken as part of the Basic Assessment (BA) process, both potentially positive and negative impacts have been identified.

The primary project components (the "Project"), for which mitigation and management measures are specified, include the following:

- » Construction of the Soetwater Facility Substation Complex (approximately 120m x 60m) and ancillaries (including a metering station, control building, admin building, workshop and associated infrastructure).

The most significant environmental impacts associated with the proposed Project include:

**Ecology:** Overall, the ecological impacts of the development will be **low negative** after mitigation measures, mainly due to a loss of small areas of vegetation, and habitat loss for fauna. Positive impacts include the active management of the alien vegetation and erosion management on the site. Impacts associated with the proposed project are unlikely to result in any fatal flaws. From an ecological perspective, the construction of the proposed Project is considered acceptable.

**Avifauna:** The avifaunal habitats in the Project site are not particularly unique, and the Project falls outside of sensitive avifaunal areas. An assessment of the level of impact identified potential impacts ranging from medium to low significance, which can be reduced to low with the application of recommended mitigation measures. The residual impacts have been found to be acceptable. The proposed Project location **is considered acceptable from an avifaunal perspective.**

**Heritage:** The overall area is considered as having a **low archaeological significance.** It appears unlikely that any significant in situ sites/material will be exposed during these developments. From a heritage perspective, the construction of the proposed project is considered acceptable.

**Social Impact:** Social impacts are expected during all phases of the development and are expected to be both positive and negative. Negative and positive impacts are expected to be of **low significance** for the various issues. Impacts can be minimised or enhanced through the implementation of the recommended management measures. From a social perspective, the proposed Project **is considered acceptable.**

**Visual Impacts:** The proposed Project infrastructure as assessed in this Basic Assessment Report is not likely to contribute significantly to the potential visual impacts associated with the much taller wind turbine structures of the authorised Soetwater Wind Farm and the existing power lines and the Komsberg MTS in the study area. Therefore the potential visual impacts associated with the proposed Project is expected to have a **low significance** and should not alter/influence the outcome of the Project decision-making. From a visual perspective, the proposed Project is **considered to be acceptable**.

**Cumulative Impacts:** Cumulative impacts from the proposed Project will result from impacts arising from multiple power lines being constructed in the area (from other project phases). As this infrastructure is located within the authorised Soetwater Wind Farm boundary, the contribution of this infrastructure to the cumulative impacts in the area is considered to be **low and acceptable**.

### **Overall conclusion**

From the specialist studies undertaken, the proposed Project is considered to be acceptable from an environmental perspective. The proposed Project locations are also considered technically and financially feasible based on detailed design and discussions with Eskom. No siting alternatives have been assessed for the proposed Project due to the location of this infrastructure within the boundaries of the authorised wind energy facility and based on the fact that the approved connections, which were considered in the EIA study for the authorised Soetwater Wind Farm and other project phases, are no longer technically feasible as connection options for the optimised Soetwater Wind Energy Facility – for reasons explained in this BAR.

Based on the findings of the studies undertaken, in terms of environmental constraints and opportunities identified through the Environmental Basic Assessment process, no environmental fatal flaws were identified to be associated with the construction of the proposed Project. Impacts are expected to be of **low significance** after the implementation of appropriate mitigation and it is recommended that the proposed Project can therefore be implemented. With reference to the information available at this planning approval stage in the project cycle, the confidence in the environmental assessment undertaken is regarded as acceptable.

The sensitivity map (Figure 1.2) is the result of a composite overlay based on the findings of the BA studies undertaken for the proposed Project. The proposed Project was concluded to be acceptable from an environmental perspective within the context of the receiving environment as it avoids any potentially sensitive areas.

## 1.2. Activities and Components associated with the Development

### 1.2.1. Construction Phase

#### **Construction of the Soetwater Facility Substation Complex:**

A facility substation complex will be required to evacuate the power into the National Eskom grid. Substations are constructed in the following simplified sequence:

- Step 1:** Surveying of the development area and negotiation with affected landowners;
- Step 2:** Final design and micro-siting of the infrastructure, including laydown areas, based on geotechnical, topographical conditions and potential environmental sensitivities;
- Step 3:** Vegetation clearance and construction of access road/tracks;
- Step 4:** Site grading and levelling;
- Step 5:** Construction of foundations;
- Step 6:** Import of the substation components;
- Step 7:** Construction of the substation;
- Step 8:** Rehabilitation of disturbed area and protection of erosion sensitive areas; and
- Step 9:** Testing and commissioning

The construction of ancillary infrastructure will follow a similar sequence as that of the substation described above.

### 1.2.2. Operation Phase

The proposed Project will require routine maintenance work throughout the operation period, which would be the same as that of the Power Purchase Agreement (PPA) of the Soetwater Wind Farm, i.e. at least 20 years. During operation, the Project will be accessed via a gravel provincial road, from other existing gravel roads/tracks in the area and any access roads established during the construction phase. During this operation phase vegetation around the Project will require management only if it impacts on the safety and operational objectives of the Project. The maintenance of the grid connection infrastructure will be the responsibility of the Proponent.

### 1.2.3. Decommissioning Phase

The Project is expected to have a lifespan of more than 25 years (with maintenance) and the infrastructure would only be decommissioned once it has

reached the end of its economic life or is no longer required. The PPA of the Soetwater Wind Farm, in terms of the REIPPPP is 20 years, and therefore the proposed Project may not be required after 20 years if the Soetwater Wind Farm is decommissioned. If the Soetwater Wind Farm is decommissioned and the proposed Project is no longer needed, the decommissioning activities would comprise of; the disassembly of the individual components and removal from site. This phase would then include the following activities:

**a. Site Preparation**

Site preparation activities will include confirming the integrity of the access to the site to accommodate the required equipment and the mobilisation of decommissioning equipment.

**b. Disassemble Components**

The components would be disassembled, and reused and recycled (where possible), or disposed of in accordance with regulatory requirements at the time of decommissioning.

**c. Rehabilitation**

Disturbed areas (where infrastructure has been removed) will be rehabilitated, if required, depending on the future land-use of the site and the relevant legislation applicable at the time of decommissioning.

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## PURPOSE AND OBJECTIVES OF THE EMPr

## CHAPTER 2

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An EMPr is a set of guidelines and actions aimed at ensuring that construction and/or installation activities, and subsequent management of facilities, are undertaken in a manner that minimises environmental risks and impacts. An effective EMPr is concerned with both the immediate outcome as well as the long-term impacts of the project. The objective of this EMPr is to provide consistent information and guidance for implementing the management and monitoring measures established in the permitting process and help achieve environmental policy goals. The purpose of an EMPr is to ensure continuous improvement of environmental performance, reducing negative impacts and enhancing positive effects during the construction and operational phases of a project.

The EMPr provides specific environmental guidance for the construction, operational and decommissioning phases of a project, and is intended to manage and mitigate construction and operational activities so that unnecessary or preventable environmental impacts do not result. These impacts range from those incurred during start up (i.e. site clearing and site establishment), during the construction activities themselves (i.e. erosion, noise, dust, and visual impacts), during site rehabilitation (i.e. soil stabilisation, re-vegetation), during operation and during decommissioning (i.e. similar to construction phase activities).

This EMPr has been compiled in accordance with Appendix 4, Section 1 of the EIA Regulations of December 2014 (refer to Table 3.1) and will be further developed in terms of specific requirements listed in any authorisations or permit issued for the proposed project. The EMPr has been developed as a set of environmental specifications which are appropriately contextualised to provide clear guidance in terms of the on-site implementation of these specifications (i.e. on-site contextualisation is provided through the inclusion of expected impacts of activities and various monitoring and implementation tools for the management measures).

This EMPr has the following objectives:

- » Outline impact management objectives and environmental specifications which are required to be implemented for the planning, construction and rehabilitation, operation, and decommissioning phases of the Project in order to manage and minimise the extent of potential environmental impacts associated with the Project.



- » Ensure that all the phases of the Project do not result in undue or reasonably avoidable adverse environmental impacts, and ensure that any potential positive environmental benefits are enhanced.
- » Identify entities responsible for the implementation of the measures and outline functions and responsibilities.
- » Propose mechanisms and frequency for monitoring compliance, and preventing long-term or permanent environmental degradation.
- » Facilitate appropriate and proactive responses to unforeseen events or changes in project implementation that was not considered in the BA process.

The management and mitigation measures identified within the BA process are systematically addressed in this EMPr, and ensure the minimisation of identified adverse environmental impacts to an acceptable level. This EMPr has been prepared as part of the environmental authorisation process for the proposed grid connection infrastructure.

The Proponent must ensure that the implementation of the Project complies with the requirements of all its Environmental Authorisations, permits, and obligations emanating from relevant environmental legislation.

This EMPr shall be binding on all the relevant parties and as contained in this EMPr, involved in the construction, operational and decommissioning phases of the project, and shall be enforceable at all levels of contract and operational management within the project.

## STRUCTURE OF THIS EMPR

## CHAPTER 3

The first two chapters provide background to the EMPr and the proposed Project, while the chapters which follow consider the following:

- » Key legislation applicable to the development;
- » Pre-construction, planning and design activities;
- » Construction activities;
- » Rehabilitation activities;
- » Operation activities; and
- » Decommissioning activities.

These chapters set out the procedures necessary for the construction, operation and decommissioning of the proposed Project in order to minimise environmental impacts and achieve environmental compliance. For each of the phases of implementation, an over-arching environmental **goal** is stated. In order to meet this goal, a number of **objectives** are listed. The EMPr has been structured in a table format in order to show the links between the goals for each phase and their associated impact management objectives, activities/risk sources, mitigation actions and management statements, monitoring requirements and performance indicators. A specific EMPr table has been established for each environmental impact management objective. The information provided within the EMPr table for each objective is outlined below.

***a). OBJECTIVE: Description of the objective, which is necessary to meet the overall goals; which take into account the findings of the BA specialist studies***

<b>Project Component/s</b>	» List of project components affecting the objective.
<b>Potential Impact</b>	» Description of the potential environmental impact if objective is not met.
<b>Activity/Risk Source</b>	» Description of activities which could affect achieving the objective.
<b>Mitigation: Target/Objective</b>	» Description of the target and/or desired outcomes of mitigation.

Mitigation: Action/Control	Responsibility	Timeframe
Lists specific action(s) required to meet the mitigation target/objective described above.	Who is responsible for the measures?	Periods for implementation.

<b>Performance Indicator</b>	Description of key indicator(s) that track progress/indicate the effectiveness of the EMP.
<b>Monitoring</b>	Mechanisms for monitoring compliance; the key monitoring actions required to check whether the objectives are being achieved, taking into consideration responsibility, frequency, methods, and reporting.

The objectives and EMPr tables are required to be reviewed and possibly modified whenever changes, such as the following, occur:

- » Planned activities change;
- » Modification to or addition to environmental objectives and targets;
- » Relevant legal or other requirements are changed or introduced; or
- » Significant progress has been made on achieving an objective or target such that it should be re-examined to determine if it is still relevant, should be modified, etc.

### 3.1. Content of the EMPr: Legislated and DEA Requirements

**Table 3.1:** Content of this EMPr in terms of NEMA and Appendix 4 of the EIA Regulations of December 2014

Requirement	EMP Reference
<b>EMP REQUIREMENTS IN TERMS OF APPENDIX 4 OF EIA REGULATIONS</b>	
(a) details of— (i) the EAP who prepared the EMPr; and (ii) the expertise of the EAP to prepare an EMPr	Section 3.2
(b) a detailed description of the aspects of the activity that are covered by the EMPr as identified by the project description;	Section 1.3
(c) a description of the impact management objectives, including management statements, identifying the impacts that need to be avoided, managed and/or mitigated as identified through the environmental impact assessment process for all phases of the development including— (i) planning and design; (ii) pre-construction activities; (iii) construction activities; (iii) where relevant operation activities; and (iv) rehabilitation of the environment after construction and where applicable post closure;	Chapter 5 – Preconstruction and planning  Chapter 6 – Construction activities  Chapter 7 – Rehabilitation  Chapter 8 – Operation

Requirement	EMP Reference
	activities
(d) a description of impact management outcomes, identifying the standard of impact management required for the aspects contemplated in paragraph (c);	Chapters 6-8
(e) a description of impact management actions, identifying the manner in which the impact management objectives and outcomes contemplated in paragraphs (c) and (d) will be achieved, and may include actions to – (i) modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation; (ii) remedy the cause of pollution or degradation and migration of pollutants; (iii) comply with any prescribed environmental management standards or practices; (iv) comply with any applicable provisions of the Act regarding closure, where applicable; (v) comply with any provisions of the Act regarding financial provisions for rehabilitation, where applicable	Actions listed in terms of each Objective detailed in Chapters 6-8
(f) the method of monitoring the implementation of the impact management actions contemplated in paragraph (e);	Monitoring requirements listed under each Objective detailed in Chapters 6-8
(g) the frequency of monitoring the implementation of the impact management actions contemplated in paragraph (e);	Monitoring requirements and timeframes listed under each Objective detailed in Chapters 6-8
(h) an indication of the persons who will be responsible for the implementation of the impact management actions;	Responsibility listed for each management action under each Objective detailed in Chapters 6-8
(i) the time periods within which the impact management actions contemplated in paragraph (e) must be implemented;	Timeframes listed for each management action under each Objective detailed in Chapters 6-8
(j) the mechanism for monitoring compliance with the impact management actions contemplated in paragraph (e);	Monitoring requirements listed under each Objective detailed in Chapters 6-8
(k) a program for reporting on compliance, taking into account the requirements as prescribed by these Regulations; and	Section 6.5
(l) an environmental awareness plan describing the manner in which— (i) the applicant intends to inform his or her employees of any environmental risk which may result from their	Section 6.4

Requirement	EMP Reference
work; and (ii) risks must be dealt with in order to avoid pollution or the degradation of the environment.	

### 3.2. Project Team

This draft EMPr was compiled by and had input from:

	Name	Company
EMPr Compilers:	Tebogo Mapinga Jo-Anne Thomas	Savannah Environmental
Ecological impact assessment	Gerhard Botha	Savannah Environmental
Avifaunal impact assessment	Andrew Pearson	Arcus Consulting Services
Heritage impact assessment	Celeste Booth	Booth Heritage Consulting

The Savannah Environmental team has extensive knowledge and experience in EIAs and environmental management, having been involved in BA processes & EIAs over the past fifteen years. The team has managed and drafted EMPRs for other power generation projects throughout South Africa, including numerous wind and solar energy facilities.

### 3.3. Details of the EAP

Environmental Assessment Practitioners (EAPs) and Public Participation consultants from Savannah Environmental who are responsible for this project are:

- » *Tebogo Mapinga* - is a Senior Environmental Consultant, holds a BSc degree with 8 years of experience in the environmental field in both public and private sectors. Her competencies lie in environmental impact assessments, compliance monitoring and public participation for small and large scale projects.
- » *Jo-Anne Thomas* - a registered Professional Natural Scientist and holds a Master of Science degree. She has 17 years' experience consulting in the environmental field. Her key focus is on strategic environmental assessment and advice; management and co-ordination of environmental projects, which includes integration of environmental studies and environmental processes into larger engineering-based projects and ensuring compliance to legislation and guidelines; compliance reporting; the identification of environmental management solutions and mitigation/risk minimising measures; and strategy and guideline development. She is currently involved in undertaking siting

processes as well as EIAs for several renewable energy projects across the country.

- » *Gabriele Wood* - holds a Honours Degree in Anthropology, obtained from the University of Johannesburg. She has 6 years consulting experience in public participation and social research. Her experience includes the design and implementation of public participation programmes and stakeholder management strategies for numerous integrated development planning and infrastructure projects. Her work focuses on managing the public participation component of Environmental Impact Assessments and Basic Assessments undertaken by Savannah Environmental.

Curricula vitae for the Savannah Environmental project team **and specialist consultants** are included in **Appendix B**.

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## **APPLICABLE LEGISLATION, POLICIES AND/OR GUIDELINES CHAPTER 4**

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The following legislation and guidelines have informed the scope and content of this EMPr Report:

- » National Environmental Management Act (Act No 107 of 1998).
- » EIA Regulations, published under Chapter 5 of the NEMA (GNR R983, GNR 984 in Government Gazette 38282 of 4 December 2014).
- » Guidelines published in terms of the NEMA EIA Regulations, in particular.

Several other Acts, standards, or guidelines have also informed the project process and the scope of issues addressed and assessed in the BAR. A review of legislative requirements applicable to the proposed project is provided in Table 4.1.

**Table 4.1:** Relevant legislative and permitting requirements applicable to the proposed grid connection infrastructure

Legislation	Applicable Requirements	Relevant Authority	Compliance requirements
<b>National Legislation</b>			
<p>National Environmental Management Act (Act No. 107 of 1998)</p>	<p>The EIA Regulations have been promulgated in terms of Chapter 5 of the Act. Listed activities which may not commence without an environmental authorisation are identified within these Regulations.</p> <p>In terms of S24(1) of NEMA, the potential impact on the environment associated with these listed activities must be assessed and reported on to the competent authority charged by NEMA with granting of the relevant environmental authorisation.</p> <p>In terms of GNR 983 and 985 of June 2010 a Basic Assessment Process is required to be undertaken for the proposed project.</p>	<ul style="list-style-type: none"> <li>» National Department of Environmental Affairs (DEA)</li> <li>» Northern Cape Department of Environment and Nature Conservation (NC DENC) – commenting authority</li> </ul>	<p>The listed activities triggered by the proposed Project has been identified and assessed in the EIA process being undertaken (i.e. Basic Assessment).</p> <p>This Basic Assessment Report will be submitted to the competent and commenting authority in support of the application for authorisation.</p>
<p>National Environmental Management Act (Act No. 107 of 1998)</p>	<p>In terms of the Duty of Care provision in S28(1) the project proponent must ensure that reasonable measures are taken throughout the life cycle of this project to ensure that any pollution or degradation of the environment associated with a project is avoided, stopped or minimised.</p>	<p>DEA</p>	<p>While no permitting or licensing requirements arise directly, the holistic consideration of the potential impacts of the proposed Project has found application in the EIA process.</p> <p>The implementation of mitigation measures are included as part of</p>



Legislation	Applicable Requirements	Relevant Authority	Compliance requirements
			the Draft EMPr and will continue to apply throughout the life cycle of the Project.
National Environmental Management: Biodiversity Act (Act No. 10 of 2004)	<p>In terms of S57, the Minister of Environmental Affairs has published a list of critically endangered, endangered, vulnerable, and protected species in GNR 151 in Government Gazette 29657 of 23 February 2007 and the regulations associated therewith in GNR 152 in GG29657 of 23 February 2007, which came into effect on 1 June 2007.</p> <p>In terms of GNR 152 of 23 February 2007: Regulations relating to listed threatened and protected species, the relevant specialists must be employed during the EIA Phase of the project to incorporate the legal provisions as well as the regulations associated with listed threatened and protected species (GNR 152) into specialist reports in order to identify permitting requirements at an early stage of the EIA Phase.</p> <p>» The Act provides for listing threatened or protected ecosystems, in one of four categories: critically endangered (CR), endangered (EN), vulnerable (VU) or protected. The first national list of threatened terrestrial</p>	<p>» DEA » NC DENC</p>	<p>A Specialist Ecological Assessment was undertaken as part of the Basic Assessment process (refer to Appendix D). As such the potential occurrence of critically endangered, endangered, vulnerable, and protected species, as well as critically endangered (CR), endangered (EN), vulnerable (VU) or protected ecosystems and species and the potential for them to be affected has been considered.</p> <p>A permit will be required for the relocation of threatened and protected plant species that were identified within the study area from NC DENC.</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance requirements
	<p>ecosystems has been gazetted, together with supporting information on the listing process including the purpose and rationale for listing ecosystems, the criteria used to identify listed ecosystems, the implications of listing ecosystems, and summary statistics and national maps of listed ecosystems (National Environmental Management: Biodiversity Act: National list of ecosystems that are threatened and in need of protection, (GG 34809, GN 1002), 9 December 2011).</p>		
<p>National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008)</p>	<p>The Minister may by notice in the <i>Gazette</i> publish a list of waste management activities that have, or are likely to have, a detrimental effect on the environment.</p> <p>The Minister may amend the list by –</p> <ul style="list-style-type: none"> <li>» Adding other waste management activities to the list.</li> <li>» Removing waste management activities from the list.</li> <li>» Making other changes to the particulars on the list.</li> </ul> <p>In terms of the Regulations published in terms of this Act (GN 921), A Basic Assessment or Environmental Impact</p>	<ul style="list-style-type: none"> <li>» DEA</li> <li>» NC DENC</li> </ul>	<p>As no waste disposal site is to be associated with the proposed Project, no permit is required in this regard.</p> <p>Waste handling, storage and disposal during construction and operation is required to be undertaken in accordance with the requirements of the Act, as detailed in the EMP (refer to Appendix G).</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance requirements
	<p>Assessment is required to be undertaken for identified listed activities (Category A and B) while Category C Activities (such as storage of waste) must be undertaken in accordance with the necessary norms and standards.</p> <p>Any person who stores waste must at least take steps, unless otherwise provided by this Act, to ensure that:</p> <ul style="list-style-type: none"> <li>» The containers in which any waste is stored, are intact and not corroded or in any other way rendered unfit for the safe storage of waste.</li> <li>» Adequate measures are taken to prevent accidental spillage or leaking.</li> <li>» The waste cannot be blown away.</li> <li>» Nuisances such as odour, visual impacts and breeding of vectors do not arise; and</li> <li>» Pollution of the environment and harm to health are prevented.</li> </ul>		
<p>National Environmental Management: Air Quality Act (Act No. 39 of 2004)</p>	<p>S18, S19, and S20 of the Act allow certain areas to be declared and managed as "priority areas."</p> <p>Declaration of controlled emitters (Part 3 of Act) and controlled fuels (Part 4 of Act) with relevant emission standards.</p>	<ul style="list-style-type: none"> <li>» DEA</li> <li>» Karoo Hoogland Local Municipality</li> </ul>	<p>Dust Control Regulations describe the measures for control and monitoring of dust, including penalties. These regulations might be applicable during the construction phase of the project. Dust management have also been accounted for in the EMPr (see</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance requirements
	<ul style="list-style-type: none"> <li>» GN R 827 – National Dust Control Regulations prescribes general measures for the control of dust in all areas</li> </ul>		Appendix G)
National Water Act (Act No. 36 of 1998)	<p>Water uses under S21 of the Act must be licensed unless such water use falls into one of the categories listed in S22 of the Act or falls under the general authorisation.</p> <p>In terms of S19, the project proponent must ensure that reasonable measures are taken throughout the life cycle of this project to prevent and remedy the effects of pollution to water resources from occurring, continuing, or recurring.</p>	<ul style="list-style-type: none"> <li>» National Department of Water and Sanitation</li> <li>» Northern Cape Department of Water and Sanitation</li> </ul>	A water use license (WUL) or General Authorisation could be required in terms of Section 21 of the Act due to the drainage lines which could be impacted by the proposed Project.
Environment Conservation Act (Act No. 73 of 1989)	<ul style="list-style-type: none"> <li>» National Noise Control Regulations (GN R154 dated 10 January 1992)</li> </ul>	<ul style="list-style-type: none"> <li>» DEA</li> <li>» NC DENC</li> </ul>	Noise impacts are expected to be associated with the construction phase of the project and are not likely to present a significant intrusion to the local community. There is no requirement for a noise permit in terms of the legislation.
Minerals and Petroleum Resources Development Act (Act No. 28 of 2002)	<ul style="list-style-type: none"> <li>» A mining permit or mining right may be required where a mineral in question is to be mined (e.g. materials from a borrow pit) in accordance with the provisions of the Act.</li> <li>» Requirements for Environmental</li> </ul>	<ul style="list-style-type: none"> <li>» Department of Mineral Resources</li> </ul>	As no borrow pits are expected to be required for Project, no mining permit or right is required to be obtained.

Legislation	Applicable Requirements	Relevant Authority	Compliance requirements
	<p>Management Programmes and Environmental Management Plans are set out in S39 of the Act.</p> <ul style="list-style-type: none"> <li>» S18, S19, and S20 of the Act allow certain areas to be declared and managed as "priority areas."</li> <li>» Declaration of controlled emitters (Part 3 of Act) and controlled fuels (Part 4 of Act) with relevant emission standards.</li> <li>» GN R 827 – National Dust Control Regulations prescribes general measures for the control of dust in all areas</li> </ul>		
National Heritage Resources Act (Act No. 25 of 1999)	<ul style="list-style-type: none"> <li>» S38 states that Heritage Impact Assessments (HIAs) are required for certain kinds of development including <ul style="list-style-type: none"> <li>» The construction of a road, power line, pipeline, canal or other similar linear development or barrier exceeding 300 m in length;</li> <li>» Any development or other activity which will change the character of a site exceeding 5 000 m<sup>2</sup> in extent</li> </ul> </li> <li>» The relevant Heritage Authority must be notified of developments such as linear developments (i.e. roads and power lines), bridges exceeding 50 m, or any development or other activity</li> </ul>	<ul style="list-style-type: none"> <li>» South African Heritage Resources Agency</li> <li>» Northern Cape Heritage Resources Authority</li> </ul>	<p>A permit may be required should any identified cultural/ heritage sites on site be required to be disturbed or destroyed as a result of the proposed development. No cultural or heritage sites were identified during the site inspection by the Heritage specialists but it is possible that some may be unearthed during construction.</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance requirements
	<p>which will change the character of a site exceeding 5 000 m<sup>2</sup>; or the rezoning of a site exceeding 10 000 m<sup>2</sup> in extent. This notification must be provided in the early stages of initiating that development, and details regarding the location, nature and extent of the proposed development must be provided.</p> <p>» Standalone HIAs are not required where an EIA is carried out as long as the EIA contains an adequate HIA component that fulfils the provisions of S38. In such cases only those components not addressed by the EIA should be covered by the heritage component.</p>		
<p>National Forests Act (Act No. 84 of 1998)</p>	<p>» In terms of S5(1) no person may cut, disturb, damage or destroy any protected tree or possess, collect, remove, transport, export, purchase, sell donate or in any other manner acquire or dispose of any protected tree or any forest product derived from a protected tree, except under a license granted by the Minister to an (applicant and subject to such period and conditions as may be stipulated”.</p> <p>» The list of protected tree species was published in GN 877 of 22 November 2013.</p>	<p>» Department of Agriculture, Forestry and Fisheries</p>	<p>No protected trees were identified within the study area and therefore no permits would be required in this regard.</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance requirements
National Veld and Forest Fire Act (Act 101 of 1998)	<ul style="list-style-type: none"> <li>» In terms of S12 the landowner would be obliged to burn firebreaks to ensure that should a veldfire occur on the property, that it does not spread to adjoining land.</li> <li>» In terms of S12 the firebreak would need to be wide and long enough to have a reasonable chance of preventing the fire from spreading, not causing erosion, and is reasonably free of inflammable material.</li> <li>» In terms of S17, the applicant must have such equipment, protective clothing, and trained personnel for extinguishing fires.</li> </ul>	Department of Agriculture, Forestry and Fisheries	While no permitting or licensing requirements arise from this legislation, this Act will find application during the construction and operational phase of the project.
Conservation of Agricultural Resources Act (CARA) (Act No 43 of 1983)	<ul style="list-style-type: none"> <li>» Prohibition of the spreading of weeds (S5).</li> <li>» Classification of categories of weeds &amp; invader plants (Regulation 15 of GN R1048) &amp; restrictions in terms of where these species may occur.</li> <li>» Requirement &amp; methods to implement control measures for alien and invasive plant species (Regulation 15E of GN R1048).</li> </ul>	Department of Agriculture, Forestry and Fisheries	An Ecology study was undertaken (refer to Appendix D) and CARA was taken into account. The relevant mitigations measures were identified and are included in the EMPr (Appendix G).
Hazardous Substances Act (Act No. 15 of 1973)	This Act regulates the control of substances that may cause injury, or ill health, or death due to their toxic, corrosive, irritant, strongly sensitising, or inflammable nature or the generation of pressure thereby in certain instances and	» Department of Health	It is necessary to identify and list all the Group I, II, III, and IV hazardous substances that may be on the site and in what operational context they are used, stored or handled. If applicable, a

Legislation	Applicable Requirements	Relevant Authority	Compliance requirements
	<p>for the control of certain electronic products. To provide for the rating of such substances or products in relation to the degree of danger; to provide for the prohibition and control of the importation, manufacture, sale, use, operation, modification, disposal or dumping of such substances and products.</p> <ul style="list-style-type: none"> <li>» Group I and II: Any substance or mixture of a substance that might by reason of its toxic, corrosive etc., nature or because it generates pressure through decomposition, heat or other means, cause extreme risk of injury etc., can be declared to be Group I or Group II hazardous substance;</li> <li>» Group IV: any electronic product;</li> <li>» Group V: any radioactive material.</li> </ul> <p>The use, conveyance, or storage of any hazardous substance (such as distillate fuel) is prohibited without an appropriate license being in force.</p>		<p>license could be required to be obtained from the Department of Health.</p>
<p>National Road Traffic Act (Act No 93 of 1996)</p>	<p>The technical recommendations for highways (TRH 11): "Draft Guidelines for Granting of Exemption Permits for the Conveyance of Abnormal Loads and for other Events on Public Roads" outline the rules and conditions which apply to the transport of abnormal loads and vehicles</p>	<ul style="list-style-type: none"> <li>» Provincial Department of Transport (provincial roads)</li> <li>» South African National Roads Agency Limited (national roads)</li> </ul>	<p>An abnormal load/vehicle permit may be required to transport the various components to site for construction. These include route clearances and permits could be required for vehicles carrying abnormally heavy or abnormally</p>



Legislation	Applicable Requirements	Relevant Authority	Compliance requirements
	<p>on public roads and the detailed procedures to be followed in applying for exemption permits are described and discussed.</p> <p>Legal axle load limits and the restrictions imposed on abnormally heavy loads are discussed in relation to the damaging effect on road pavements, bridges and culverts.</p> <p>» The general conditions, limitations and escort requirements for abnormally dimensioned loads and vehicles are also discussed and reference is made to speed restrictions, power/mass ratio, mass distribution and general operating conditions for abnormal loads and vehicles. Provision is also made for the granting of permits for all other exemptions from the requirements of the National Road Traffic Act and the relevant Regulations.</p>		<p>dimensioned loads.</p> <p>Depending on the trailer configuration and height when loaded, some of the components may not meet specified dimensional limitations (height and width) and would need to apply for the relevant permit/clearance.</p>
<b>Provincial Legislation</b>			
<p>Northern Cape Nature Conservation Act (Act No. 9 of 2009)</p>	<p>» Provides inter alia for the sustainable utilisation of wild animals, aquatic biota and plants as well as permitting and trade regulations regarding wild fauna and flora within the province. In terms of this act the following</p>	<p>» NC DENC</p>	<p>A permit is required for any activities which involve species listed under schedule 1 or 2. The NC DENC permit office provides an integrated permit which can be used for all provincial and</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance requirements
	<p>section may be relevant with regards to any security fencing the development may require.</p> <p><b>Manipulation of boundary fences</b></p> <p>19. No Person may –</p> <p>(a) erect, alter remove or partly remove or cause to be erected, altered removed or partly removed, any fence, whether on a common boundary or on such person’s own property, in such a manner that any wild animal which as a result thereof gains access or may gain access to the property or a camp on the property, cannot escape or is likely not to be able to escape therefrom;</p> <p>The Act also lists protected fauna and flora under 3 schedules ranging from Specially protected (Schedule 1), protected (schedule 2) to common (schedule 3). The majority of mammals, reptiles and amphibians are listed under Schedule 2, except for listed species which are under Schedule 1.</p>		<p>Threatened or Protected Species (TOPS)-related permit requirements.</p> <p>Provincially protected and threatened plant species were found within the study area. Therefore, a permit could be required for removal of such species. A permit could be required from NC DENC to relocate protected plants and to clear natural vegetation mainly along the transmission line grid where pylons would be erected.</p>

## MANAGEMENT PROGRAMME: PRE-CONSTRUCTION

## CHAPTER 5

**Overall Goal:** undertake the pre-construction (planning and design) activities in a way that:

- » Ensures that the design responds to the identified environmental constraints and opportunities.
- » Ensures that pre-construction activities are undertaken in accordance with all relevant legislative requirements.
- » Ensures that the best environmental options are selected for the linear components.
- » Enables the construction activities to be undertaken without significant disruption to other land uses and activities in the area.

In order to meet this goal, the following objectives have been identified, together with necessary actions and monitoring requirements.

### 5.1 Objectives

***OBJECTIVE 1: Ensure the design responds to identified environmental constraints and opportunities***

The major impact associated with the construction activities is likely to result from vegetation clearing that will be required.

A sensitivity map has been prepared from the findings of the BA studies undertaken (refer to Figure 1.2).

#### Shrubby Succulent Rocky Patches

Although patchy in distribution and collectively covering a small area of the proposed footprint area, these habitats contribute greatly to habitat richness and species richness. The high abundance of geophytes and succulents found in these areas, of which a high percentage is only restricted to these patches, make these patches worthy of conservation. Thus these patches have been demarcated as being of medium sensitivity.

A number of species were noted that is Protected according to Schedule 1 and 2 of the Northern Cape Nature Conservation Act, 2009 (Act No. 9 of 2009). Three

species were identified on site which are listed within the Threatened Species Programme of the South African National Biodiversity Institute:

- » *Romulea komsbergensis* (Near threatened);
- » *Drimia uranthera* (Rare); and
- » *Drimia altissima* (Declining).

<b>Project Component/s</b>	<ul style="list-style-type: none"> <li>» Facility Substation Complex</li> <li>» Ancillaries</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Soil erosion</li> <li>» Impacts on flora and fauna</li> <li>» Loss of protected plant species</li> <li>» Impacts on sensitive habitats</li> </ul>
<b>Activities/Risk Sources</b>	<ul style="list-style-type: none"> <li>» Construction not being confined as far as possible to area of impact</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» The design responds to the identified environmental constraints and opportunities</li> </ul>

<b>Mitigation: Action/Control</b>	<b>Responsibility</b>	<b>Timeframe</b>
Plan and conduct pre-construction activities in an environmentally acceptable manner	Proponent	Pre-construction
Obtain any additional environmental permits required (biodiversity permits, Water Use Licence or General Authorisation etc.) based on final positioning of infrastructure	Proponent	Project planning
A rehabilitation plan that specifies the rehabilitation process should be compiled	Proponent and/or Contractor	Pre-construction
Any new access roads are required to be carefully planned and constructed to minimise the impacted area and prevent unnecessary excavation, placement, and compaction of soil. Construction vehicles also need to consider the load carrying capacity of road surfaces and adhere to all other prescriptive regulations regarding the use of public roads by construction vehicles.	Engineer/ Contractor	Planning/Design Phase
Compile an appropriate storm water management plan.	Contractor	Pre-construction
The terms of this EMPr and the Environmental Authorisation must be included in all tender documentation and Contractor/sub-contractor contracts.	Proponent and Contractor	Tender process
Tender documentation should contain guidelines for the involvement of labour, entrepreneurs, businesses, and Small, Medium and Micro Enterprises (SMMEs)	Proponent / Contractor and subcontractors	Planning/ Pre-construction

Mitigation: Action/Control	Responsibility	Timeframe
from the local sector		

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» The design meets the objectives and does not degrade the environment to unsatisfactory levels</li> <li>» Design and layouts respond to the mitigation measures and recommendations in the BAR</li> </ul>
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>» The Contractor must familiarise himself/herself with the design prior to the commencement of construction</li> <li>» The Environmental Control Officer (ECO) and the Environmental Officer (EO) must familiarise himself/herself with the alignment of the servitude prior to the commencement of construction</li> </ul>

**OBJECTIVE 2: To ensure effective communication mechanisms**

On-going communication with affected and surrounding landowners is important to maintain during the construction and operational phases of the Project. Any issues and concerns raised should be addressed as far as possible in as short a timeframe as possible.

<b>Project component/s</b>	<ul style="list-style-type: none"> <li>» Facility Substation Complex</li> <li>» Ancillaries</li> </ul>
<b>Potential Impact</b>	» Impacts on affected and surrounding landowners and land uses
<b>Activity/risk source</b>	<ul style="list-style-type: none"> <li>» Activities associated with the construction of the Project</li> <li>» Activities associated with the operation of the Project</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» Effective communication with affected and surrounding landowners</li> <li>» Addressing of any issues and concerns raised as far as possible in as short a timeframe as possible</li> </ul>

Mitigation: Action/control	Responsibility	Timeframe
Implement a grievance mechanism procedure for the public (Appendix A)	Proponent / Contractor	Pre-construction (construction procedure) Pre-operation (operation procedure)
Develop and implement a grievance mechanism for the construction, operational and decommissioning phases of the project for all employees, contractors, subcontractors and	Contractor	Pre-construction (construction procedure) Pre-operation

<b>Mitigation: Action/control</b>	<b>Responsibility</b>	<b>Timeframe</b>
site personnel. This procedure should be in line with the South African Labour Law.		(operation procedure)
<b>Performance Indicator</b>	» Effective communication procedures in place	
<b>Monitoring</b>	» An incident reporting system should be used to record non-conformances to the EMPr	

## MANAGEMENT PROGRAMME: CONSTRUCTION

## CHAPTER 6

**Overall Goal:** Undertake the construction phase in a way that:

- » Ensures that construction activities are appropriately managed in respect of environmental aspects and impacts.
- » Enables construction activities to be undertaken without significant disruption to other land uses and activities in the area, in particular concerning farming practices, traffic and road use, and effects on local residents.
- » Minimises the impact on the indigenous natural vegetation, and habitats of ecological value.
- » Minimises impacts on fauna in the study area.
- » Minimises the impact on heritage sites should they be uncovered.
- » Establishes an environmental baseline during construction activities on the site, where possible.

### 6.1 Institutional Arrangements: Roles and Responsibilities for the Construction Phase

The Proponent must ensure that the project complies with the requirements of all environmental authorisations and permits, and obligations emanating from other relevant environmental legislation. This obligation is partly met through the development of the EMPr, and the implementation of the EMPr through its integration into the contract documentation. The Proponent will retain various key roles and responsibilities during the construction phase.

***OBJECTIVE 1: Establish clear reporting, communication, and responsibilities in relation to overall implementation of the EMPr***

Formal responsibilities are necessary to ensure that key procedures are executed. Specific responsibilities of the Project Manager; Site Manager; Environmental Officer (EO)/ Environmental Representative; Environmental Control Officer (ECO) and Contractor for the construction phase of this project are as detailed below. Roles and responsibilities should be confirmed and updated throughout the construction phase in order to ensure effective environmental management and communication between parties.

**Project Manager/Coordinator** is responsible for overall management of project and EMPr implementation. The following tasks will fall within his/her responsibilities:

- » Be familiar with the recommendations and mitigation measures of this EMPr, and implement these measures.
- » Commission internal audits of the construction site against the EMPr
- » Confine the construction site to the demarcated areas
- » Ensure that transgressions are rectified through the implementation of corrective action contained in this EMPr.

**Site Manager** (Proponent's on-site Representative) will:

- » Be fully knowledgeable with the contents of the BA and risk management.
- » Monitor site activities on a daily basis for compliance.
- » Be fully knowledgeable with the contents and conditions of the Environmental Authorisation (once issued).
- » Be fully knowledgeable with the contents of this EMPr.
- » Be fully knowledgeable with the contents of all relevant environmental legislation, and ensure compliance with these.
- » Have overall responsibility of the EMPr and its implementation.
- » Conduct internal audits to ensure compliance to the EMPr.
- » Ensure there is communication with the Project Manager, the ECO, and relevant discipline engineers on matters concerning the environment.
- » Ensure that no actions are taken which will harm or may indirectly cause harm to the environment, and take steps to prevent pollution on the site.
- » Confine activities to the demarcated construction site.

An independent **ECO** must be appointed by the Proponent prior to the commencement of any authorised activities. The ECO will be responsible for monitoring, reviewing and verifying compliance by the Contractor with the environmental specifications of the EMPr and the conditions of the Environmental Authorisation. Accordingly, the ECO will:

- » Be fully knowledgeable with the contents of the BA.
- » Be fully knowledgeable with the contents and conditions of the Environmental Authorisation.
- » Be fully knowledgeable with the contents of the EMPr.
- » Be fully knowledgeable of all the licences and permits issued to the site.
- » Be fully knowledgeable with the contents of all relevant environmental legislation, and ensure compliance with them.



- » Ensure that the contents of this document are communicated to the Contractor site staff and that the Site Manager and Contractor are constantly made aware of the contents through discussion.
- » Ensure that the compliance of the EMPr, EA and the legislation is monitored through regular and comprehensive inspection of the site and surrounding areas.
- » Ensure that if the EMPr, EA and/or the legislation conditions, regulations or specifications are not followed then appropriate measures are undertaken to address any non-compliances (for example an ECO may cease construction or an activity to prevent a non-compliance from continuing, if reasonable).
- » Monitoring and verification must be implemented to ensure that environmental impacts are kept to a minimum, as far as possible.
- » Ensure that the Site Manager has input into the review and acceptance of construction methods and method statements.
- » Ensure that activities on site comply with all relevant environmental legislation.
- » Ensure that a removal is ordered of any person(s) and/or equipment responsible for any contravention of the specifications of the EMPr.
- » Keep record of all activities on site, problems identified, transgressions noted and a task schedule of tasks undertaken by the EO/ Environmental Representative.
- » Ensure that the compilation of progress reports for submission to the Project Manager, with input from the Site Manager, takes place on a regular basis, including a final post-construction audit.
- » Ensure that there is communication with the Site Manager regarding the monitoring of the site.
- » Ensure that any non-compliance or remedial measures that need to be applied are reported.
- » Submit independent reports to the DEA and other regulating authorities (if specifically required) regarding compliance with the requirements of the EMPr, EA and other environmental permits.

**Contractor** is responsible for the overall execution of the activities envisioned in the construction phase including the implementation and compliance with recommendations and conditions of the EMPr as well as the EA. The Contractor must therefore:

- » Ensure implementation and compliance with the EMPr at all times during construction activities and maintain, inter alia, an environmental register which keeps a record of all environmental incidents which occurs on the site during the construction of the Project.

- » Ensure that the compliance of the EMPr, EA and the legislation is monitored through regular and comprehensive inspection of the site and surrounding areas.
- » Ensure that if the EMPr, EA and/or the legislation conditions, regulations or specifications are not followed then appropriate measures are undertaken to address any non-compliances (for example an ECO may cease construction or an activity to prevent a non-compliance from continuing, if reasonable).
- » Implementation of corrective actions recommended by the EO/ Environmental Representative, for non-conformances recorded by the ECO, and Project Coordinator within a reasonable period.

These incidents may include:

- » Public involvement / complaints;
- » Health and safety incidents;
- » Incidents involving Hazardous materials stored on site; and/or
- » Non-compliance incidents.

**EO/ Environmental Representative:** The Contractor's EO/ Environmental Representative (employed by the Contractor), is responsible for:

- » Ensuring that the compliance of the EMPr, EA, and the legislation is monitored through regular and comprehensive inspection of the site and surrounding areas.
- » Ensuring that if the EMPr, EA and/or the legislation conditions, regulations or specifications are not followed then appropriate measures are undertaken to address any non-compliances.
- » Implementation of all other environmental licenses required.
- » Ensure that the compilation of progress reports for submission to the Project Manager, with input from the Site Manager, takes place on a regular basis, including a final post-construction audit.
- » Ensure that there is communication with the Site Manager regarding the monitoring of the site.
- » Ensure that any non-compliance or remedial measures that need to be applied are reported.
- » Managing the day-to-day on-site implementation of this EMPr.
- » Managing daily checklists, and weekly reports.
- » Compilation of regular (usually weekly) Monitoring Reports.
- » Liaise and advise on all environmental and related issues and ensure that any complaints received from the public are duly recorded and forwarded to the Site Manager and Contractor.

The Contractor's EO/ Environmental Representative should:

- » Be well versed in environmental matters.
- » Understand the relevant environmental legislation and processes.
- » Understand the hierarchy of Environmental Compliance Reporting, and the implications of Non-Compliance.
- » Know the background of the project and understand the implementation programme.
- » Be able to resolve conflicts and make recommendations on site in terms of the requirements of this Specification.
- » Keep accurate and detailed records of all EMPr-related activities on site.

## 6.2 Objectives

In order to meet the overall goal for construction, the following objectives, actions, and monitoring requirements have been identified.

### ***OBJECTIVE 2: Minimise impacts related to inappropriate site establishment***

The Contractor must take all reasonable measures to ensure the safety of the public in the surrounding area.

<b>Project Component/s</b>	<ul style="list-style-type: none"> <li>» Facility Substation Complex</li> <li>» Ancillaries</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Hazards to landowners and public</li> <li>» Damage to indigenous natural vegetation, due largely to ignorance of where such areas are located</li> <li>» Loss of protected species</li> </ul>
<b>Activities/Risk Sources</b>	<ul style="list-style-type: none"> <li>» Excavations</li> <li>» Movement of construction vehicles in the area and on-site</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» To secure the site against unauthorised entry</li> <li>» To protect members of the public/landowners/residents</li> <li>» No loss of or damage to sensitive vegetation in areas outside the immediate development footprint</li> </ul>

<b>Mitigation: Action/Control</b>	<b>Responsibility</b>	<b>Timeframe</b>
Secure site, working areas and excavations in an appropriate manner, as agreed with the Site Manager and EO.	Contractor	Site establishment, and duration of construction
Where necessary control access, fence, and secure area	Contractor	Site establishment, and duration

<b>Mitigation: Action/Control</b>	<b>Responsibility</b>	<b>Timeframe</b>
		of construction
Fence and secure contractor's equipment camp/ laydown area	Contractor	Site establishment
Where the public could be exposed to danger by any of the works or site activities, the contractor must, as appropriate, provide suitable flagmen, barriers and/or warning signs in English, Afrikaans and any other relevant local languages, all to the approval of the Site Manager	Contractor	Site establishment and duration of construction
All unattended open excavations shall be adequately demarcated and/or fenced. Adequate protective measures must be implemented to prevent unauthorised access to the working area and the internal access/haul routes	Contractor	Site establishment and duration of construction
Establish appropriately bunded areas for storage of hazardous materials (i.e. fuel/chemicals to be required during construction)	Contractor	Site establishment
All development footprints should be appropriately fenced off and clearly demarcated	Contractor	Site establishment, and duration of construction
Establish the necessary ablution facilities with chemical toilets and provide adequate sanitation facilities and ablutions for construction workers (1 toilet per every 15 workers) at appropriate walking distance. Provide sanitary bins for female workers	Contractor	Site establishment, and duration of construction
Ablution or sanitation facilities should not be located within 100 m from a 1:100 year flood line including drainage lines or within 32m of a watercourse, whichever is greatest.	Contractor	Site establishment, and duration of construction
Supply adequate (closable, tamper proof) waste collection bins at site where construction is being undertaken	Contractor	Site establishment, and duration of construction
Separate bins should be provided for general and hazardous waste	Contractor	Site establishment, and duration of construction
As far as possible, provision should be made for separation of waste for recycling	Contractor	Site establishment, and duration of construction

**Performance**

» Site is secure and there is no unauthorised entry

<b>Indicator</b>	<ul style="list-style-type: none"> <li>» No members of the public/ landowners injured as a result of the construction activities</li> <li>» Appropriate and adequate waste management and sanitation facilities provided at construction site</li> </ul>
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>» An incident reporting system must be used to record non-conformances to the EMPr</li> <li>» ECO and EO to monitor all construction areas on a continuous basis until all construction is completed. Non-conformances must be immediately reported to the site manager</li> </ul>

**OBJECTIVE 3: Appropriate management of the construction site and construction workers**

<b>Project Component/s</b>	<ul style="list-style-type: none"> <li>» Facility Substation Complex</li> <li>» Ancillaries</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Damage to indigenous natural vegetation and sensitive areas</li> <li>» Damage to and/or loss of topsoil (i.e. pollution, soil compaction etc.)</li> <li>» Impacts on the surrounding environment due to inadequate sanitation and waste removal facilities</li> <li>» Pollution/contamination of the environment</li> </ul>
<b>Activities/Risk Sources</b>	<ul style="list-style-type: none"> <li>» Vegetation clearing and levelling of equipment storage area(s)/ laydown area(s)</li> <li>» Access to and from the equipment storage area(s)/ laydown area(s)</li> <li>» Ablution facilities</li> <li>» Contractors not aware of the requirements of the EMPr, leading to unnecessary impacts on the surrounding environment</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» Limit equipment storage to within demarcated designated areas</li> <li>» Ensure adequate sanitation facilities and waste management practices</li> <li>» Ensure appropriate management of actions by on-site personnel in order to minimise impacts to the surrounding environment</li> </ul>

<b>Mitigation: Action/Control</b>	<b>Responsibility</b>	<b>Timeframe</b>
The siting of the construction equipment camp(s)/ laydown area(s) must take cognisance of any sensitive areas reflected on the sensitivity map	Contractor	Pre-construction
As far as possible, minimise vegetation clearing and levelling for equipment storage area(s)/ laydown area(s)	Contractor	Site establishment, and during construction

Mitigation: Action/Control	Responsibility	Timeframe
Rehabilitate all disturbed areas as soon as construction is complete within an area, if practically possible. No exotic plants may be used in rehabilitation. Only indigenous plants of the area may be used	Contractor	Construction
Ensure waste containers are maintained and emptied on a regular basis	Contractor	Duration of construction
Ensure that all personnel have the appropriate level of environmental awareness and competence to ensure continued environmental due diligence and on-going minimisation/avoidance of environmental harm. This can be achieved through the provision of appropriate environmental awareness training to all personnel. Records of all training undertaken must be kept. Topics must include: <ul style="list-style-type: none"> <li>» What is meant by "Environment"</li> <li>» Why the environment needs to be protected and conserved</li> <li>» How construction activities can impact on the environment</li> <li>» Awareness of emergency and spills response provisions</li> <li>» Social responsibility during construction activities, e.g. being considerate to local residents</li> </ul>	Contractor	Duration of construction
Contractors must use chemical toilets/ablation facilities provided on site; no ablation facilities will be permitted outside the designated areas. A minimum of one toilet shall be provided per 15 persons or less at each working area such as the Contractor's camp	Contractor and sub-contractor/s	Duration of contract
Ensure ablation facilities are appropriately maintained. Ablutions must be cleaned regularly and associated waste disposed of at a registered/permitted waste disposal site. The ablations facilities must be removed from site when construction is completed	Contractor	Duration of construction
Cooking and eating of meals must take place in a designated area	Contractor and sub-contractor/s	Duration of contract
No firewood or kindling may be gathered from the site or surrounds	Contractor and sub-contractor/s	Duration of contract
No open fires are permitted on site and construction personnel must be made aware of the consequences of starting a fire on site to avoid damage to neighbouring farms	Contractor and sub-contractor/s	Duration of contract

<b>Mitigation: Action/Control</b>	<b>Responsibility</b>	<b>Timeframe</b>
All litter must be deposited in a clearly marked, closed, animal-proof disposal bin in the construction area. Particular attention needs to be paid to food waste	Contractor and sub-contractor/s	Duration of contract
No plants may be collected from site for medicinal or any other purpose	Contractor	Duration of contract
No one may disturb flora or fauna in/outside of the demarcated construction area/s	Contractor and sub-contractor/s	Duration of contract
Fire-fighting equipment and training must be provided before the construction phase commences	Contractor and sub-contractor/s	Duration of contract
A Code of conduct for construction workers should be implemented	Contractor and sub-contractor/s	Construction
Contractors must ensure that all workers are informed of the conditions contained in the EMPr before commencing work, specifically consequences of stock theft and trespassing on adjacent farms	Contractor and sub-contractor/s	Construction
Construction workers, except for security personnel – if required, are not allowed to reside on site outside of working hours or without proper supervision	Contractor and sub-contractor/s	Duration of contract
On completion of the construction phase, all construction workers must leave the site	Contractor and sub-contractor/s	Construction

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» The construction equipment camps have avoided sensitive areas</li> <li>» Ablution and waste removal facilities are in a good working order and do not pollute the environment due to mismanagement</li> <li>» All areas are rehabilitated promptly after construction in an area that has been completed, where practical</li> <li>» Excess vegetation clearing and levelling is not undertaken</li> <li>» No complaints regarding contractor behaviour or habits</li> <li>» Appropriate training of all staff is undertaken prior to them commencing work on the construction site</li> <li>» Code of conduct drafted before commencement of construction phase</li> </ul>
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>» Regular audits of the construction camps and areas of construction on site by the ECO and/or EO</li> <li>» Proof of disposal of sewage at an appropriate wastewater treatment works or proof of service slips from a relevant contractor</li> <li>» An incident reporting system should be used to record non-</li> </ul>

	conformances to the EMPr » Observation and supervision of Contractor practices throughout construction phase by the ECO and EO » Complaints must be investigated and, if appropriate, acted upon
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**OBJECTIVE 4: Maximise local employment associated with the construction phase**

Although limited, employment opportunities could be created during the construction phase, specifically for semi-skilled and unskilled workers. Local labour should be used as far as possible.

<b>Project Component/s</b>	» Facility Substation Complex » Ancillaries
<b>Potential Impact</b>	» The opportunities and benefits associated with the creation of local employment and business
<b>Activities/Risk Sources</b>	» Contractors who make use of their own labour for unskilled tasks, thereby reducing the employment and business opportunities for locals » Sourcing of individuals with skills similar to the local labour pool outside the municipal area
<b>Mitigation: Target/Objective</b>	» Employment of a maximum number of low-skilled to semi-skilled workers for the project from the local area where possible

<b>Mitigation: Action/Control</b>	<b>Responsibility</b>	<b>Timeframe</b>
Construction workers should be recruited from the local areas, as far as possible	Contractor	Duration of construction

<b>Performance Indicator</b>	» The involvement of local labour and previously disadvantaged individuals is promoted » Labour, entrepreneurs, businesses, and Small, Medium and Micro-sized Enterprises (SMMEs) from the local sector are awarded jobs/ contracts, where practically possible, based on requirements in the tender documentation
<b>Monitoring</b>	» The Proponent and or appointed ECO must monitor indicators listed above to ensure that they have been met for the construction phase



**OBJECTIVE 5: Minimise impacts related to traffic management and transportation of equipment and materials to site**

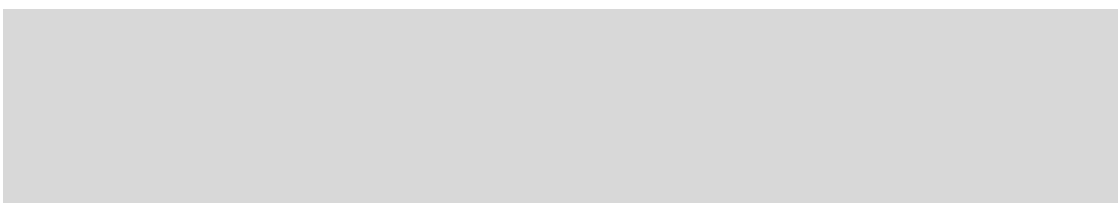
The construction phase of the project will be the most significant in terms of generating potential traffic impacts; resulting from the transport of equipment, materials and construction crews to the site and the return of the vehicles after delivery of materials.

<b>Project Component/s</b>	<ul style="list-style-type: none"> <li>» Facility Substation Complex</li> <li>» Ancillaries</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Impact of construction vehicles on road surfaces, and possible increased risk in accidents involving people and animals</li> <li>» Traffic congestion, particularly on narrow roads or on road passes where overtaking is not permitted</li> <li>» Deterioration of road pavement conditions (both surfaced and gravel road) due to increased traffic</li> </ul>
<b>Activities/Risk Sources</b>	<ul style="list-style-type: none"> <li>» Construction vehicle movement</li> <li>» Speeding on local roads</li> <li>» Degradation of local road conditions</li> <li>» Site preparation and earthworks</li> <li>» Foundations or plant equipment installation</li> <li>» Transportation of ready-mix cement from off-site batching plant to the site, if required</li> <li>» Mobile construction equipment movement on-site</li> <li>» Construction activities related to the Project</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» Minimise impact of traffic on local traffic volume, existing infrastructure, property owners, animals, and road users</li> <li>» To ensure all vehicles are roadworthy and all materials/equipment are transported appropriately and within any imposed permit/licence conditions</li> </ul>

<b>Mitigation: Action/Control</b>	<b>Responsibility</b>	<b>Timeframe</b>
Strict vehicle safety standards should be implemented and monitored	Contractor	Construction
All relevant permits for abnormal loads must be applied for from the relevant authority	Contractor (or appointed transportation contractor)	Pre-construction
A designated access to the proposed site must be created to ensure safe entry and exit	Contractor	Pre-construction
No unnecessary deviation from approved transportation or construction routes must be allowed, unless roads are closed for whatever reason outside the control of the Contractor	Contractor	Duration of contract
Appropriate road management strategies must be	Contractor (or	Pre-

<b>Mitigation: Action/Control</b>	<b>Responsibility</b>	<b>Timeframe</b>
implemented on external and internal roads with all employees and contractors required to abide by standard road and safety procedures	appointed transportation contractor)	construction
Any traffic delays resulting from the presence of construction traffic must be co-ordinated with the appropriate authorities	Contractor	Duration of contract
The movement of all vehicles within the site must be on designated roadways or tracks created for the purpose of construction, or where possible, on existing tracks as far as practically possible	Contractor	Duration of contract
Signage must be established at appropriate points warning of turning traffic and the construction site (all signage to be in accordance with prescribed standards)	Contractor	Duration of contract
Signs must be placed along construction roads to identify speed limits, travel restrictions, and other standard traffic control information. Signage must be appropriately maintained for the duration of the construction period	Contractor	Duration of contract
A speed limit of 40km/h should be implemented for vehicles travelling on site in order to minimise dust generation and ensure safety of personnel and the environment and lessen environmental degradation	Contractor	Duration of contract
All construction vehicles and or machineries travelling on public roads must adhere to the specified speed limits and all drivers must be in possession of an appropriate valid driver's license	Contractor	Duration of contract

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» Vehicles keeping to the speed limits</li> <li>» Vehicles are in good working order and safety standards are implemented</li> <li>» Local residents and road users are aware of vehicle movements and schedules</li> <li>» No construction traffic related accidents are experienced</li> <li>» Local road conditions and road surfaces are not unnecessarily degraded by development</li> <li>» Complaints of residents are not received (e.g. concerning the speeding of heavy vehicles)</li> <li>» Drivers made aware of the potential safety issues and enforcement of strict speed limits when they are employed</li> </ul>
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>» Proponent, Contractor or appointed ECO (whichever is more applicable) must monitor performance indicators to ensure that they have been effectively implemented.</li> </ul>



**OBJECTIVE 6: To avoid and or minimise the potential impact of the activities during the construction on the safety of local communities and the potential loss of livestock, game, other fauna and damage to farm infrastructure**

An inflow of workers could, as a worst case scenario and irrespective of the size of the workforce, pose some security risks. Criminals could also use the opportunity, due to “outsiders” being in the area, to undertake their criminal activities.

<b>Project Component/s</b>	» Facility Substation Complex » Ancillaries
<b>Potential Impact</b>	» Impact on safety of farmers and communities (increased crime etc.) and potential loss of livestock due to stock theft by construction workers, illegal hunting or trapping of fauna and game, and also damage to farm infrastructure, such as gates and fences
<b>Activities/Risk Sources</b>	» The presence of construction workers on the site can pose a potential safety risk to local farmers and communities and may result in stock thefts or illegal hunting/ trapping of fauna and or game. The activities of construction workers may also result in damage to farm infrastructure
<b>Mitigation: Target/Objective</b>	» To avoid and or minimise the potential impact on local communities and their livelihoods

<b>Mitigation: Action/Control</b>	<b>Responsibility</b>	<b>Timeframe</b>
The housing of construction workers on the site should be limited to security personnel, if required in addition to the security that will be at the Soetwater Wind Farm site.	Contractor	Construction
Ensure that all farm gates are locked (when not in use) and secure (when in use) at all times	Contractor	Construction
Procedures and measures to prevent, and in worst cases, attend to fires should be developed in consultation with the surrounding property owners	Contractor	Pre-construction and when required
Contact details of emergency and police services should be prominently displayed on site	Contractor	Construction
Appropriate fire-fighting equipment must be present on site and members of the workforce should be appropriately trained in using this equipment in the fighting of veld fires	Contractor	Construction
Employees, visitors and/or subcontractors should be made well aware of the consequences of any damage to private property and/or loss of livestock, game	Contractor	Duration of contract

Mitigation: Action/Control	Responsibility	Timeframe
and/or other fauna		
Should there be any damage to private property and/or loss of livestock, game and/or other fauna that can be linked to the Contractor, or any subcontractor, the landowner shall be compensated accordingly upon sufficient proof thereof.	Contractor	Duration of contract
Reasonable site access control should be implemented.	Contractor	Duration of contract

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» No criminal activities and theft of livestock, illegal hunting or trapping of game and/or other fauna attributable to the construction workers are reported</li> <li>» No complaints received from landowners or the general public</li> <li>» No fires or on-site accidents occur</li> </ul>
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>» Proponent , Contractor or appointed ECO (whichever is more applicable) must monitor indicators listed above to ensure that they have been implemented</li> </ul>

### **OBJECTIVE 7: Management of dust and other air emissions**

During the construction phase, limited gaseous or particulate emissions are anticipated from exhaust emissions from construction vehicles and equipment on-site, as well as vehicle entrained dust from the movement of vehicles on the main and internal access roads

<b>Project Component/s</b>	<ul style="list-style-type: none"> <li>» Facility Substation Complex</li> <li>» Ancillaries</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Dust and particulates from vehicle movement to and on-site, foundation excavation, road construction activities, road maintenance activities, temporary stockpiles, and vegetation clearing affecting the surrounding residents and visibility</li> <li>» Release of minor amounts of air pollutants (for example NO<sub>2</sub>, CO<sub>2</sub> and SO<sub>2</sub>) from vehicles and construction equipment</li> </ul>
<b>Activities/Risk Sources</b>	<ul style="list-style-type: none"> <li>» Clearing of vegetation and topsoil</li> <li>» Excavation, grading, scraping, levelling, digging, drilling</li> <li>» Transport of materials, equipment, and components on internal access roads/ tracks</li> <li>» Re-entrainment of deposited dust by vehicle movements</li> <li>» Wind erosion from topsoil and spoil stockpiles and unsealed roads and surfaces</li> <li>» Fuel burning from construction vehicles with combustion</li> </ul>

	engines
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» To ensure emissions from all construction vehicles with combustion engines are minimised, where possible, for the duration of the construction phase</li> <li>» To minimise nuisance to the community from dust emissions and to comply with workplace health and safety requirements for the duration of the construction phase</li> </ul>

<b>Mitigation: Action/Control</b>	<b>Responsibility</b>	<b>Timeframe</b>
Access roads must be maintained in a manner that will ensure that nuisance from dust emissions from road or vehicle sources are not visibly excessive	Contractor	Construction
Ensure that any damage to roads attributed to construction activities is repaired before completion of the construction phase	Contractor	Construction
Appropriate dust suppressant must be applied on all exposed areas, stockpiles and gravel roads as required to minimise/control airborne dust. These could include the use of water or other appropriate dust suppressants, as determined by the local site conditions and in consultation with the ECO and/or EO	Contractor	Duration of contract
Haul vehicles moving outside the construction site carrying material that can be wind-blown must be covered with tarpaulins	Contractor	Duration of contract
A speed limit of 40km/h should be implemented for vehicles travelling on site in order to minimise dust generation and ensure safety of personnel and the environment	Contractor	Duration of contract
Drivers must be made aware of the potential safety issues and enforcement of strict speed limits when they are employed	Contractor	Pre-construction
Dust-generating activities or earthworks may need to be rescheduled or the frequency of application of dust control/suppressant increased during periods of high winds if excessive visible dust is blowing toward nearby residences outside the site	Contractor	Duration of contract
Disturbed areas must be re-vegetated as soon as practicable in line with the progression of construction activities	Contractor	Completion of construction
Vehicles and equipment must be maintained in road-worthy condition at all times	Contractor	Duration of contract

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» No complaints from affected residents or community regarding dust or vehicle emissions</li> <li>» Dust suppression measures implemented for all heavy vehicles</li> </ul>
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	<ul style="list-style-type: none"> <li>that require such measures during the construction phase.</li> <li>» Road worthy certificates in place for all heavy vehicles at outset of construction phase and monitored on a monthly basis</li> </ul>
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>» The ECO must monitor indicators listed above to ensure that they have been met for the construction phase.</li> <li>» Immediate reporting by personnel of any potential or actual issues with nuisance dust or emissions to the Site Manager</li> <li>» An incident reporting system must be used to record non-conformances to the EMP</li> <li>» Public complaints register must be developed and maintained on site</li> </ul>

**OBJECTIVE 8: Minimisation of development footprint and disturbance to topsoil**

In order to minimise impacts on flora, fauna and ecological processes, the development footprint should be limited as far as possible.

<b>Project Component/s</b>	<ul style="list-style-type: none"> <li>» Facility Substation Complex</li> <li>» Ancillaries</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Impacts on natural vegetation and faunal habitats</li> <li>» Impacts on soil</li> <li>» Loss of topsoil</li> </ul>
<b>Activity/Risk Source</b>	<ul style="list-style-type: none"> <li>» Site preparation and earthworks</li> <li>» Excavation of foundations</li> <li>» Construction of site access roads</li> <li>» Site preparation (e.g. compaction)</li> <li>» Construction activities related to the Project</li> <li>» Stockpiling of topsoil, subsoil and spoil material</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» To retain natural vegetation, where possible</li> <li>» To minimise footprints of disturbance of vegetation/habitats</li> <li>» Remove and store all topsoil on areas that are to be excavated; and use this topsoil in subsequent rehabilitation of disturbed areas</li> <li>» Minimise spoil material</li> </ul>

<b>Mitigation: Action/Control</b>	<b>Responsibility</b>	<b>Timeframe</b>
Stockpiled topsoil should be covered to prevent erosion if deemed necessary by the ECO/EO	Contractor	Site establishment & duration of contract
Areas to be cleared must be clearly marked on-site to eliminate the potential for unnecessary clearing	Contractor	Pre-construction
The extent of clearing and disturbance to the native	Contractor	Site

Mitigation: Action/Control	Responsibility	Timeframe
vegetation must be kept to a minimum so that impact on flora and fauna and their habitats are restricted		establishment & duration of contract
No activities must take place out of the demarcated construction site	Contractor	Site establishment & duration of contract
Any fill material required must be sourced from a commercial off-site suitable/permitted source, quarry or borrow pit. Where possible, material from foundation excavations must be used as fill on-site	Contractor	Duration of contract

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» Minimal disturbance outside of designated work areas</li> <li>» Minimise clearing of existing vegetation</li> <li>» Topsoil appropriately stored</li> </ul>
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>» Observation of vegetation clearing and soil management activities by ECO/EO throughout construction phase</li> <li>» Supervision of all clearing and earthworks</li> <li>» An incident reporting system must be used to record non-conformances to the EMPr</li> </ul>

***OBJECTIVE 9: Minimise the impacts on and loss of indigenous vegetation and faunal habitat and fauna***

The extent of the development footprint area is very limited and furthermore restricted to an area already transformed by the existing infrastructure. The majority of the site can be regarded as low sensitive with the exception of the rocky patch and drainage line(s) which is regarded as Medium Sensitive. A permit will be required for the removal or relocation of any protected plant species where they are to be affected.

<b>Project component/s</b>	<ul style="list-style-type: none"> <li>» Facility Substation Complex</li> <li>» Ancillaries</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Clearing of natural vegetation</li> <li>» Construction activities</li> <li>» Traffic to and from site</li> </ul>
<b>Activity/risk source</b>	<ul style="list-style-type: none"> <li>» Site preparation and earthworks</li> <li>» Construction-related traffic</li> <li>» Foundations or plant equipment installation</li> <li>» Mobile construction equipment</li> <li>» Construction activities related to the Project</li> <li>» Dumping or damage by construction equipment outside of</li> </ul>

	demarcated construction areas
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» To retain natural vegetation in the moderate to high sensitive areas on the site</li> <li>» To minimise footprints of disturbance of vegetation/habitats on-site</li> <li>» To protect fauna</li> </ul>

<b>Mitigation: Action/control</b>	<b>Responsibility</b>	<b>Timeframe</b>
Areas containing protected plant species must be noted and every effort made to reduce the impacts of construction on these areas. Protected plant species in any area to be cleared should be identified and rescued. Permits will be required from NC DENC to remove or translocate protected plant species, if they are to be affected.	Contractor in consultation with Specialist	Pre-construction and construction
Areas to be cleared must be clearly marked in the field to eliminate unnecessary clearing. In this regard, staff/ employees must be educated to keep construction activities within the demarcated areas	Contractor	Pre-construction and construction
The extent of clearing and disturbance to the native vegetation must be kept to a minimum so that the impact on flora is restricted	Contractor	Site establishment & duration of contract
A site rehabilitation programme must be implemented	Contractor in consultation with Specialist	Duration of contract
Protected plants identified within the development footprint must not be disturbed or removed prior to a relevant permit being granted	Contractor	Construction
Employees must be prohibited from harvesting wild plants for any purpose	Contractor	Duration of contract
Restrict construction activities to post-dawn and pre-dusk	Contractor	Construction
Enforce speed limits of 40km/h within the construction site	Contractor	Construction
ECO and EO must inspect the immediate vegetation for evidence of snares.	Contractor/ECO /EO	Construction
Any fauna directly threatened by the construction activities within 1km from the construction site should be removed to a safe location by the ECO or other suitably qualified person, e.g. the EO.	Contractor/ECO /EO	Pre-construction and construction
Construction staff should undergo an environmental induction at the start of the project to ensure that they are aware of the appropriate response to the presence of fauna at the site and do not kill or harm	Contractor/ECO /EO	Pre-construction and construction



Mitigation: Action/control	Responsibility	Timeframe
fauna such as snakes or other reptiles which are often feared.		

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» No disturbance outside of designated work areas</li> <li>» Minimised clearing of existing/natural vegetation</li> <li>» Limited impacts on areas of identified and demarcated sensitive habitats/vegetation</li> <li>» No trapping or killing of fauna illegally</li> </ul>
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>» Observation of vegetation clearing activities by ECO or the Contractor's EO throughout construction phase</li> <li>» Supervision of all clearing and earthworks by ECO or the Contractor's EO</li> <li>» An incident reporting system must be used to record non-conformances to the EMPr</li> </ul>

***OBJECTIVE 10: Minimise the establishment and spread of alien invasive plants***

On-going alien plant monitoring and removal should be undertaken on all areas of natural vegetation on an annual basis. Some alien invasive plant species occur in the study area and there is a potential for alien plants to spread or become established following disturbance on site.

<b>Project Component/s</b>	<ul style="list-style-type: none"> <li>» Facility Substation Complex</li> <li>» Ancillaries</li> </ul>
<b>Potential Impact</b>	» Invasion of natural vegetation surrounding the site by declared weeds or invasive alien species
<b>Activities/Risk Sources</b>	» Construction
<b>Mitigation: Target/Objective</b>	» No alien plants within project control area during the construction and operation phases

Mitigation: Action/Control	Responsibility	Timeframe
Avoid creating conditions in which alien plants may become established: <ul style="list-style-type: none"> <li>» Keep disturbance of indigenous vegetation to a minimum.</li> <li>» Rehabilitate disturbed areas as quickly as possible.</li> <li>» Do not import soil from areas with alien plants.</li> </ul>	Contractor	Construction
Establish an on-going monitoring programme to detect and quantify any alien species that may become	Contractor	Construction

Mitigation: Action/Control	Responsibility	Timeframe
established and identify the problem species (as per Conservation of Agricultural Resources Act and Biodiversity Act)		
Immediately control any alien plants that become established using registered control methods	Contractor	Construction

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» Disturbed areas rehabilitated, if area does not establish naturally, and at least 40% plant cover achieved on rehabilitated sites over a period of 2 to 5 years</li> <li>» Site free of erosion and alien invasive plants</li> </ul>
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>» On-going monitoring of area by EO during construction</li> <li>» If any alien invasive species are detected then the distribution of these should be mapped and investigated</li> <li>» The results should be interpreted in terms of the risk posed to sensitive habitats within and surrounding the project area</li> <li>» Reporting frequency depends on legal compliance framework</li> </ul>

### **OBJECTIVE 11: Minimise soil degradation and erosion**

The soil on site may be impacted in terms of:

- » Soil degradation including erosion (by wind and water) and subsequent deposition elsewhere.
- » Uncontrolled run-off relating to construction activity (excessive wetting, uncontrolled discharge, etc.) will also lead to accelerated erosion and possible sedimentation of drainage lines.
- » Degradation of the natural soil profile due to excavation, stockpiling, compaction, pollution and other construction activities will affect soil forming processes and associated ecosystems. Degradation of parent rock is considered low as there are no deep excavations envisaged.

<b>Project Component/s</b>	<ul style="list-style-type: none"> <li>» Facility Substation Complex</li> <li>» Ancillaries</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Soil and rock degradation</li> <li>» Soil erosion</li> <li>» Increased deposition of soil into drainage systems</li> <li>» Increased run-off over the site</li> </ul>
<b>Activities/Risk Sources</b>	<ul style="list-style-type: none"> <li>» Removal of vegetation, excavation, stockpiling, compaction and pollution of soil through uncontrolled spillage</li> <li>» Rainfall - water erosion of disturbed areas</li> <li>» Wind erosion of disturbed areas</li> </ul>

	» Concentrated discharge of water from construction activity
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» Minimise extent of disturbance areas</li> <li>» Minimise activity within disturbance areas</li> <li>» Minimise soil degradation (mixing, wetting, compaction, etc.)</li> <li>» Minimise soil erosion</li> <li>» Minimise deposition of soil into drainage lines</li> <li>» Minimise instability of embankments/excavations</li> </ul>

<b>Mitigation: Action/Control</b>	<b>Responsibility</b>	<b>Timeframe</b>
Identify disturbance areas and restrict construction activity to these areas	Contractor	Before and during construction
Rehabilitate disturbance areas as soon as practicable when construction in an area is complete	Contractor	During and after construction
Any new access roads are required to be carefully planned and constructed to minimise the impacted area and prevent unnecessary excavation, placement, and compaction of soil	Engineer Contractor	Design and construction
Minimise unnecessary removal of vegetation which adds stability to soil	Contractor	Construction
Excavated topsoil must be stockpiled in designated areas separate from base material at a maximum height of 2m and covered (during windy conditions) or vegetated until replaced during rehabilitation	Contractor	Site establishment & duration of contract
Topsoil must not be stripped or stockpiled when it is raining or when the soil is wet as compaction will occur. ECO/EO to monitor this activity.	Contractor/ECO /EO	Site establishment Maintenance: for duration of contract
Implement appropriate erosion control measures (i.e. run-off attenuation on slopes (sand bags, logs), silt fences, storm water catch-pits, shade nets, or temporary mulching over denuded area as required)	Contractor	Erection: Before construction Maintenance: Duration of contract
Control depth of excavations and stability of cut faces/sidewalls using appropriate methods	Contractor	Duration of contract
Implement an appropriate storm water management plan	Contractor	Duration of construction

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» No activity outside demarcated disturbance areas</li> <li>» Minimal level of soil erosion around site</li> <li>» No activity in restricted areas</li> </ul>
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>» On-going inspections of the site by the ECO and EO</li> <li>» Monthly inspections of erosion control devices</li> </ul>

	<ul style="list-style-type: none"> <li>» Immediate reporting of ineffective erosion and sediment control systems</li> <li>» An incident reporting system must be in place to record non-conformances</li> </ul>
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**OBJECTIVE 12: Protection of heritage resources**

No significant archaeological sites/materials were observed within the development area during the investigation. Although it is unlikely that archaeological remains will be found in situ, there is always a possibility that human remains and/or other archaeological and historical material may be uncovered during the development.

<b>Project Component/s</b>	<ul style="list-style-type: none"> <li>» Facility Substation Complex</li> <li>» Ancillaries</li> </ul>
<b>Potential Impact</b>	» Heritage objects/ artefacts/ unidentified sites/ burial and grave sites found on site are inappropriately managed or destroyed
<b>Activity/Risk Source</b>	<ul style="list-style-type: none"> <li>» Site preparation and earthworks</li> <li>» Foundations or plant equipment installation</li> <li>» Mobile construction equipment movement on site</li> </ul>
<b>Mitigation: Target/Objective</b>	» To ensure that any heritage objects found on site are treated appropriately and in accordance with the relevant legislation

<b>Mitigation: Action/control</b>	<b>Responsibility</b>	<b>Timeframe</b>
Areas required to be cleared during construction must be clearly marked in the field to avoid unnecessary disturbance of adjacent areas	Contractor & EO	Pre-construction
Project employees and any contract staff will maintain, at all times, a high level of awareness of the possibility of discovering heritage sites. Familiarise all staff and contractors with procedures for dealing with heritage objects/sites if uncovered	Contractor	Duration of contract
Construction managers/foremen/ECO/EO should familiarise himself/herself before construction starts on the possible types of heritage sites and cultural material they may encounter and the procedures to follow if they find sites. The ECO and the contractor's EO may be trained to identify/follow the relevant procedure and report to the site manager if heritage sites are found.	Contractor	Duration of contract
If concentrations of historical and pre-colonial archaeological heritage material and/or human remains (including graves and burials) are	Proponent, Contractor and in consultation with	Duration of contract

Mitigation: Action/control	Responsibility	Timeframe
<p>potentially uncovered during construction, all work in the immediate area affecting the find must cease immediately and be reported to the South African Heritage Resources Agency (SAHRA) and/or the MacGregor Museum, Kimberly (+27 (0) 53 839 2706 Or 021 462 4502) so that systematic and professional investigation/excavation can be undertaken if considered necessary. Phase 2 mitigation in the form of test-pitting/sampling or systematic excavations and collections of the pre-colonial shell middens and associated artefacts could then be conducted to establish the contextual status of the sites and possibly remove the archaeological deposit before development activities in the immediate area affecting the find continue.</p>	<p>Specialist</p>	
<p>A person must be trained as a site monitor to report any archaeological sites found during the development. Construction managers/foremen and/or the ECO/ EO/ Environmental representative should be informed before construction starts on the possible types of heritage sites and cultural material they may encounter and the procedures to follow when they find sites.</p>	<p>Proponent , and Contractor in consultation with Specialist</p>	<p>Pre-construction</p>

<p><b>Performance Indicator</b></p>	<ul style="list-style-type: none"> <li>» No unnecessary disturbance outside of designated work areas</li> <li>» All heritage items located are dealt with as per the legislative guidelines</li> <li>» Project employees and any contract staff aware of potential for uncovering heritage materials during construction</li> </ul>
<p><b>Monitoring</b></p>	<ul style="list-style-type: none"> <li>» Observation of clearing and excavation activities by EO throughout construction phase</li> <li>» Appropriate permits obtained from SAHRA prior to the disturbance or destruction of heritage sites, if applicable</li> <li>» An incident reporting system must be used to record non-conformances to the EMPr</li> </ul>

***OBJECTIVE 13: Minimisation of visual impacts associated with construction***

During the construction phase heavy vehicles, components, equipment and construction crews will frequent the area and may cause, at the very least, a cumulative visual nuisance to landowners and residents in the area as well as

road users, albeit for a limited period. The placement of lay-down areas and temporary construction camps should be carefully considered in order to not negatively influence the future perception of the project. Secondary visual impacts associated with the construction phase, such as the sight of construction vehicles, dust and construction litter must be managed to reduce visual impacts.

<b>Project Component/s</b>	» Facility Substation Complex » Ancillaries
<b>Potential Impact</b>	» Visual impact of general construction activities » Potential scarring of the landscape due to vegetation clearing
<b>Activity/Risk Source</b>	» The viewing of the above mentioned by observers on or near the site
<b>Mitigation: Target/Objective</b>	» Minimal visual intrusion by construction activities and construction accommodation and intact vegetation cover outside of immediate works areas

<b>Mitigation: Action/Control</b>	<b>Responsibility</b>	<b>Timeframe</b>
Ensure that vegetation is not unnecessarily removed during the construction period	Contractor	Planning
Reduce the construction period as far as possible through careful logistical planning and productive implementation of resources	Contractor	Planning
Plan the placement of laydown areas and temporary construction equipment camps in order to minimise vegetation clearing (i.e. in already disturbed areas) wherever possible	Contractor	Construction
Restrict the activities and movement of construction workers and vehicles to the immediate construction site and existing access roads/ tracks	Contractor	Construction
Ensure that rubble, litter, and disused construction materials are appropriately stored (if not removed daily) and then disposed regularly at licensed waste facilities	Contractor	Construction
Reduce and control construction dust using approved dust suppression techniques as and when required (i.e. whenever dust becomes apparent)	Contractor	Construction
Restrict construction activities to daylight hours whenever possible in order to reduce lighting impacts	Contractor	Construction
Rehabilitate all disturbed areas immediately after the completion of construction works	Contractor	Construction

<b>Performance Indicator</b>	» Vegetation cover near the site is intact with no evidence of degradation or erosion » Construction site is kept in a neat and tidy state
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<b>Monitoring</b>	<ul style="list-style-type: none"> <li>» Monitoring of vegetation clearing during the construction phase by the EO</li> <li>» Monitoring of rehabilitation activities to ensure appropriate rehabilitation of the site</li> <li>» An incident reporting system will be used to record non-conformances to the EMPr</li> <li>» Public complaints register must be developed and maintained on site</li> </ul>
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**OBJECTIVE 14: Noise control**

Traffic movement to and from the site, particularly of heavy-duty vehicles during construction, could potentially result in a noise impact.

<b>Project component/s</b>	<ul style="list-style-type: none"> <li>» Facility Substation Complex</li> <li>» Ancillaries</li> </ul>
<b>Potential Impact</b>	» Nuisance noise from construction affecting the surrounding communities
<b>Activity/risk source</b>	<ul style="list-style-type: none"> <li>» Site preparation and earthworks</li> <li>» Construction-related transport</li> <li>» Foundations or plant equipment installation</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» To minimise noise to any surrounding residences from the construction activities</li> <li>» To comply with Noise Control Regulations and SANS Guidelines</li> <li>» To ensure noise levels are acceptable at residences in close proximity to construction activities</li> </ul>

Mitigation: Action/control	Responsibility	Timeframe
On-site construction activities should be limited to daylight hours as far as possible	Contractor	Duration of contract
Construction noise shall be managed according to the Noise Control Regulations and SANS 10103	Contractor	Duration of contract
All construction equipment, including vehicles, must be properly and appropriately maintained in order to minimise noise generation, e.g. silencers must be in good working order	Contractor	Duration of contract

<b>Performance Indicator</b>	» No complaints received concerning noise
<b>Monitoring</b>	» A complaints register must be maintained, in which any complaints from the community will be logged. Complaints will be investigated and, if appropriate, acted upon

- » An incident reporting system must be used to record non-conformances to the EMPr

**OBJECTIVE 15: Appropriate handling and management of waste**

The main wastes expected will include spoil from excavation activities, general construction waste, hazardous waste (i.e. fuel), and liquid waste (including grey water and sewage). In order to manage the wastes effectively, guidelines for the assessment, classification, and management of wastes, along with industry principles for minimising construction wastes must be implemented.

<b>Project Component/s</b>	<ul style="list-style-type: none"> <li>» Facility Substation Complex</li> <li>» Ancillaries</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Inefficient use of resources resulting in excessive waste generation</li> <li>» Litter or contamination of the site or water through poor waste management practices</li> </ul>
<b>Activity/Risk Source</b>	<ul style="list-style-type: none"> <li>» Packaging</li> <li>» Other construction wastes</li> <li>» Hydrocarbon use and storage</li> <li>» Spoil material from excavation, earthworks, and site preparation</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» To comply with waste management legislation</li> <li>» To minimise production of waste</li> <li>» To ensure appropriate waste storage and disposal</li> <li>» To avoid environmental harm from waste disposal</li> <li>» A waste manifest should be developed for the ablutions showing proof of disposal of sewage at appropriate wastewater treatment works</li> </ul>

<b>Mitigation: Action/control</b>	<b>Responsibility</b>	<b>Timeframe</b>
The storage of flammable and combustible liquids such as oils must be in designated areas which are appropriately bunded, and stored in compliance with Material Safety Data Sheets (MSDS) files.	Contractor	Duration of contract
Any spills will receive the necessary clean-up action. Bioremediation kits are to be kept on-site and used to remediate any spills that may occur. Appropriate arrangements to be made for appropriate collection and disposal of all cleaning materials, absorbents and contaminated soils (in accordance with a waste management plan)	Contractor	Duration of contract



<b>Mitigation: Action/control</b>	<b>Responsibility</b>	<b>Timeframe</b>
Any storage and disposal permits/approvals which may be required must be obtained, and the conditions attached to such permits and approvals will be complied with	Contractor	Duration of contract
Routine servicing and maintenance of vehicles is not to take place on-site (except for emergency situations or e.g. large cranes which cannot be moved off-site). If repairs of vehicles must take place on site, an appropriate drip tray must be used to contain any fuel or oils	Contractor	Duration of contract
Transport of all hazardous substances must be in accordance with the relevant legislation and regulations	Contractor	Duration of contract
Waste disposal records must be available for review at any time	Contractor	Duration of contract
Construction contractors must provide specific detailed waste management plans to deal with all waste streams	Contractor	Duration of contract
Specific areas must be designated on-site for the temporary management of various waste streams, i.e. general refuse, construction waste (wood and metal scrap) and contaminated waste. Location of such areas must seek to minimise the potential for impact on the surrounding environment, including prevention of contaminated runoff, seepage and vermin control	Contractor	Duration of contract
Where possible, construction and general wastes on-site must be reused or recycled. Bins and skips must be available on-site for collection, separation and storage of waste streams (such as wood, metals, general refuse etc.)	Contractor	Duration of contract
Disposal of waste must be in accordance with relevant legislative requirements, including the use of licensed contractors and licensed waste disposal sites	Contractor	Duration of contract
Hydrocarbon waste must be contained and stored in sealed containers within an appropriately bunded area	Contractor	Duration of contract
Waste and surplus dangerous goods must be kept to a minimum and must be transported by approved waste contractors to sites designated for their disposal	Contractor	Duration of contract
Documentation (waste manifest) must be maintained detailing the quantity, nature and fate of any hazardous waste	Contractor	Duration of contract
An incident/complaints register must be established and maintained on-site	Contractor	Duration of contract
Hazardous and non-hazardous waste must be separated at source. Separate waste collection bins must be provided for this purpose. These bins must be	Contractors	Erection: during site establishment

<b>Mitigation: Action/control</b>	<b>Responsibility</b>	<b>Timeframe</b>
clearly marked and appropriately covered		Maintenance: for duration of Contract within a particular area
All solid waste collected must be disposed of at a registered waste disposal site. A certificate of disposal must be obtained and kept on file. The disposal of waste must be in accordance with all relevant legislation. Under no circumstances may solid waste be burnt or buried on site	Contractors	Erection: during site establishment Maintenance: for duration of Contract within a particular area
Supply waste collection bins at construction equipment and construction crew camps	Contractors	Erection: during site establishment Maintenance: for duration of Contract within a particular area
Construction equipment must be refuelled within designated refuelling locations, or where remote refuelling is required, appropriate drip trays must be utilised	Contractor	Duration of contract
All stored fuels to be maintained within a bund and on a sealed surface	Contractor	Duration of contract
Fuel storage areas must be inspected regularly to ensure bund stability, integrity and function	Contractor	Duration of contract
Construction machinery must be stored within a bunded area and on a sealed surface	Contractor	Duration of contract
Oily water from bunds at the substation must be removed from site by licensed contractors	Contractor	Duration of contract
Spilled cement and concrete must be cleaned up as soon as possible and disposed of at a suitably licensed waste disposal site	Contractor	Duration of contract
Corrective action must be undertaken immediately if a complaint is made, or potential/actual leak or spill of polluting substance identified. This includes stopping the contaminant from further escaping, cleaning up the affected environment as much as practically possible and implementing preventive measures	Contractor	Duration of contract
In the event of a major spill or leak of contaminants, the relevant administering authority must be immediately notified as per the notification of	Contractor	Duration of contract

Mitigation: Action/control	Responsibility	Timeframe
emergencies/incidents. Spill kits to be kept on-site		
Any contaminated/polluted soil removed from the site must be disposed of at a licensed hazardous waste disposal facility	Contractor	Duration of contract
Upon the completion of construction, the area will be cleared of potentially polluting materials	Contractor	Completion of construction

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» No complaints received regarding waste on site or indiscriminate dumping</li> <li>» Availability of all appropriate waste manifests for all waste streams</li> </ul>
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>» Observation of waste management practices throughout construction phase by EO and contractor</li> <li>» Supervision of waste management practices throughout construction phase by EO and contractor</li> <li>» A complaints register must be maintained, in which any complaints from the community will be logged. Complaints will be investigated and, if appropriate, acted upon</li> <li>» An incident reporting system must be used to record non-conformances to the EMP</li> </ul>

***OBJECTIVE 16: Appropriate handling and storage of chemicals and hazardous substances***

The construction phase will involve the storage and handling of a variety of chemicals including adhesives, abrasives, oils and lubricants, paints and solvents.

<b>Project Component/s</b>	<ul style="list-style-type: none"> <li>» Facility Substation Complex</li> <li>» Ancillaries</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Release of contaminated water from contact with spilled chemicals</li> <li>» Generation of contaminated wastes from used chemical containers</li> </ul>
<b>Activity/Risk Source</b>	<ul style="list-style-type: none"> <li>» Vehicles associated with site preparation and earthworks</li> <li>» Construction activities of area and linear infrastructure</li> <li>» Hydrocarbon use and storage</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» To ensure that the storage and handling of chemicals and hydrocarbons on-site does not cause pollution to the environment or harm to persons or animals</li> <li>» To ensure that the storage and maintenance of machinery on-</li> </ul>

	site does not cause pollution of the environment or harm to persons or animals
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<b>Mitigation: Action/Control</b>	<b>Responsibility</b>	<b>Timeframe</b>
Appropriate spill kits must be made available onsite for the clean-up of spills and leaks of contaminants	Contractor	Duration of contract
Corrective action must be undertaken immediately if a potential/actual leak or spill of a polluting substance is identified. This includes stopping the contaminant from further escaping, cleaning up the affected environment as much as practically possible and implementing preventive measures	Contractor	Duration of contract
In the event of a major spill or leak of contaminants, the relevant administering authority must be immediately notified as per the notification of emergencies/incidents	Contractor	Duration of contract
Spilled cement must be cleaned up as soon as possible and disposed of at a suitably licensed waste disposal site	Contractor	Duration of contract
Any contaminated/polluted soil can be stored onsite to a maximum of 90 days before having to be removed from the site and must be disposed of at a licensed hazardous waste disposal facility. If not removed from the site within 90 days, it could require a Waste Management License.	Contractor	Duration of contract
Routine servicing and maintenance of vehicles must not take place on-site but on designated bunded areas at the camp (except for emergencies). If repairs of vehicles must take place, an appropriate drip tray must be used to contain any fuel or oils leaks	Contractor	Duration of contract
All stored fuels must be maintained within a bunded area and on a sealed surface	Contractor	Duration of contract
Fuel storage areas must be inspected regularly to ensure bund stability, integrity and function	Contractor	Duration of contract
Small construction machineries (i.e. stumpers, generators etc.) must be stored in an appropriately sealed area	Contractor	Duration of contract
The storage of flammable and combustible liquids such as oils will be in designated areas which are appropriately bunded, and stored in compliance with Material Safety Data Sheets (MSDS) files	Contractor	Duration of contract
Drip trays must be placed under stationery machineries in sensitive areas	Contractor	Duration of contract
Any storage and disposal permits/approvals which may be required must be obtained, and the conditions	Contractor	Duration of contract

Mitigation: Action/Control	Responsibility	Timeframe
attached to such permits and approvals must be compiled with		
Transport of all hazardous substances must be in accordance with the relevant legislation and regulations	Contractor	Duration of contract
All small chemical substances used onsite must be accompanied by a portable drip tray to store them	Contractor	Duration of contract
Construction vehicles must be washed within designated area, agreed with the EO and the site manager	Contractor	Duration of contract
The sediment control and water quality structures used on-site must be monitored and maintained in an operational state at all times	Contractor	Duration of contract
Upon the completion of construction, the area must be cleared of potentially polluting materials	Contractor	Completion of construction

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» No chemical spills outside of designated storage areas</li> <li>» No unattended water or soil contamination by spills</li> <li>» No complaints received regarding waste on site or indiscriminate dumping</li> </ul>
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>» Supervision of waste management practices throughout construction phase by EO and contractor</li> <li>» A complaints register must be maintained, in which any complaints from the community will be logged</li> <li>» An incident reporting system must be used to record non-conformances to the EMPr</li> </ul>

### 6.3 Detailing Method Statements

The environmental specifications are required to be underpinned by a series of Method Statements, within which the Contractors and Service Providers are required to outline how any identified environmental risks will be practically mitigated and managed for the duration of the contract, or for the time period in which that risk will exist, and how specifications within this EMPr will be met. That is, the Contractor will be required to describe how specified requirements will be achieved through the submission of written Method Statements to the Site Manager and ECO.

A Method Statement is defined as "a written submission by the Contractor in response to the environmental specification or a request by the Site Manager and ECO, setting out the plant, materials, labour and method the Contractor proposes using to conduct an activity, in such detail that the Site Manager and ECO is able to assess whether the Contractor's proposal is in accordance with the

Specifications and/or will produce results in accordance with the Specifications".  
The Method Statement must cover applicable details with regard to:

- » Responsible person/s;
- » Construction procedures;
- » Materials and equipment to be used;
- » Getting the equipment to and from site;
- » How the equipment/material will be moved while on-site;
- » How and where material will be stored;
- » The containment (or action to be taken if containment is not possible) of leaks or spills of any liquid or material that may occur;
- » Timing and location of activities;
- » Compliance/non-compliance with the Specifications; and
- » Any other information deemed necessary by the Site Manager and/or ECO.

Specific method statements required may include, *inter alia*:

- » Site establishment
- » Preparation of the site
- » Soil management/stockpiling and erosion control.
- » Excavations and backfilling procedure.
- » Stipulate norms and standards for water supply and usage (i.e.: comply strictly to licence and legislation requirements and restrictions, if applicable)
- » Storm water management procedures
- » Wash bay for the construction vehicles and or machineries
- » Ablution facilities (placement, maintenance, management and servicing)
- » Solid Waste Management:
- » Liquid waste management:
- » Dust and noise pollution
- » Hazardous substance storage (Ensure compliance with all national, regional and local legislation with regard to the storage of oils, fuels, lubricants, solvents, wood treatments, bitumen, cement, pesticides and any other harmful and hazardous substances and materials. South African National Standards apply).
- » Fire prevention and management measures on site.
- » Fauna and flora protection process on and off site (i.e. removal to reintroduction or replanting, if necessary).
- » Incident and accident reporting protocol.
- » General administration
- » Designate access road/ tracks and the protocol while roads are in use.
- » Requirements on gate control protocols.

The Contractor may not commence the activity covered by the Method Statement until it has been provided to, reviewed and accepted by the Site Manager and/or ECO, except in the case of emergencies and then only with the consent of the Site Manager. Review and acceptance (or approval where required) of the Method Statement will not absolve the Contractor from their obligations or responsibilities in terms of their contract.

Failure to submit a method statement may result in suspension of the activity concerned until such time as a method statement has been submitted and approved. The ECO must monitor the construction activities to ensure that these are undertaken in accordance with the approved Method Statement(s).

#### **6.4 Awareness and Competence: Construction Phase**

To achieve effective environmental management, it is important that Contractors are aware of the responsibilities in terms of the relevant environmental legislation and the contents of this EMPr. The Contractor is responsible for informing employees and sub-contractors of their environmental obligations in terms of the environmental specifications, and for ensuring that employees are adequately experienced and properly trained in order to execute the works in a manner that will minimise environmental impacts.

The Contractors obligations in this regard include the following:

- » Employees must have a basic understanding of the key environmental features of the construction site and the surrounding environment.
- » Ensuring that a copy of the EMPr is readily available on-site, and that all site employees are aware of the location and have access to the document.
- » Employees shall be familiar with the requirements of the EMPr and the environmental specifications as they apply to the construction of the Project.
- » Ensuring that, prior to commencing any site works, all employees and sub-contractors have attended an Environmental Awareness Training course (see 6.4.1 below).
  - The course should be sufficient to provide the site staff with an appreciation of the project's environmental requirements, and how they are to be implemented.
- » Awareness of any other relevant environmental matters, which are deemed necessary by the ECO.
- » Ensure that construction workers have received basic training in environmental management, including the storage and handling of hazardous substances, minimisation of disturbance to sensitive areas, management of waste, and prevention of water pollution.
- » Ensure that employees receive environmental awareness training.

- » Training should be done either in a written or verbal format but must be appropriate for the receiving audience.
- » Ensuring that employee information posters, outlining the environmental “do’s” and “don’ts” are erected at prominent locations throughout the site.
- » Records must be kept of those that have completed the relevant training.
- » Refresher sessions must be held annually to ensure the contractor staffs are aware of their environmental obligations as practically possible, detailed below.

#### **6.4.1 Environmental Awareness Training**

Environmental Awareness Training must take the form of an on-site talk and demonstration by the ECO and Contractor’s EO before the commencement of site establishment and construction on site. The education/awareness programme should be aimed at all levels of management and construction workers within the contractor team. A record of attendance of this training must be maintained by the ECO and Contractor’s EO on site. Proof of awareness training should be kept on record.

#### **6.4.2 Induction Training**

Environmental induction training must be presented to all persons who are to work on the site – be it for short or long durations; Contractor’s or Engineer’s staff; administrative or site staff; sub-contractors or visitors to the site.

This induction training should include discussing the proponent’s environmental policy and values, the function of the EMPr and Contract Specifications and the importance and reasons for compliance to these. The induction training must highlight overall do’s and don’ts on site and clarify the contractual and legal repercussions of non-compliance (penalty fees will be outlined in the service level agreement between the proponent and the contractor). The non-conformance reporting system must be explained during the induction as well. Opportunity for questions and clarifications must form part of this training. A record of attendance of this training must be maintained by the EO on site. Proof of induction training should be kept on record.

#### **6.4.3 Toolbox Talks**

Toolbox talks should be held on a scheduled and regular basis (at least twice a month/ if when necessary) where foremen, environmental and safety representatives of different components of the Works and sub-consultants hold talks relating to environmental practices and safety awareness on site. These talks should also include discussions on possible common incidents occurring on



site and ones recommended by the onsite ECO/EO and the prevention of reoccurrence thereof. Records of attendance and the awareness talk subject must be kept on file.

## **6.5 Monitoring Schedule: Construction Phase**

A monitoring schedule should be in place internally not only to ensure conformance with the conditions of the EMPr, but also to monitor any environmental issues and impacts which have not been accounted for in the EMPr that are, or could result in significant environmental impacts for which corrective action is required. The independent ECO will be responsible for monitoring for the most part although will include others on a needs basis (also refer to section 6.5.2 below). The Project Manager will ensure that the internal monitoring is conducted and reported.

The aim of the monitoring and auditing process would be to monitor the implementation of the specified environmental specifications, in order to:

- » Monitor and audit compliance with the prescriptive and procedural terms of the environmental specifications.
- » Ensure adequate and appropriate interventions to address non-compliance.
- » Ensure adequate and appropriate interventions to address environmental degradation.
- » Provide a mechanism for the lodging and resolution of public complaints.
- » Ensure appropriate and adequate record keeping related to environmental compliance.

### **6.5.1. Non-Conformance Reports**

All supervisory staff including Foremen, Engineers, ECO and EO must be provided the means to be able to submit non-conformance reports to the Site Manager. Non-conformance reports will describe, in detail, the cause, nature and effects of any environmental non-conformance by the Contractor. Records of penalties imposed may be required by the relevant authority within 48 (forty eight) hours.

The non-conformance report will be updated on completion of the corrective measures indicated on the finding sheet. The report must indicate that the remediation measures have been implemented timeously and that the non-conformance can be closed-out to the satisfaction of the Site Manager and ECO/EO.

### **6.5.2. Monitoring Reports**

Monitoring reports will be compiled by the ECO on a monthly basis and, if requested, must be submitted to DEA for their records. This report should include details of the activities undertaken in the reporting period, any non-conformances or incidents recorded if any, corrective action required, and details of those non-conformances or incidents which have been closed out.

### **6.5.3. Final Audit Report**

A final Environmental Audit Report must be compiled by an independent auditor and be submitted to DEA upon completion of the construction and rehabilitation activities. This report must indicate the date of the audit, the name of the auditor and the outcome of the audit in terms of compliance with the Environmental Authorisation conditions and the requirements of the EMPr.

**MANAGEMENT PROGRAMME: REHABILITATION**

**CHAPTER 7**

**Overall Goal:** Undertake the rehabilitation measures in a way that:

- » Ensures rehabilitation of disturbed areas following the execution of the works, such that residual environmental impacts are remediated or curtailed.

**7.1. Objectives**

In order to meet this goal, the following objective, actions and monitoring requirements are relevant:

***OBJECTIVE 1: Ensure appropriate rehabilitation of disturbed areas such that residual environmental impacts are remediated or curtailed***

Areas requiring rehabilitation will include all areas disturbed during the construction phase and that are not required for regular operation and maintenance operations. Rehabilitation should be undertaken in an area as soon as possible after the completion of construction activities within that area.

<b>Project Component/s</b>	<ul style="list-style-type: none"> <li>» Facility Substation Complex</li> <li>» Ancillaries</li> </ul>
<b>Potential Impact</b>	» Environmental integrity of the site undermined resulting in reduced visual aesthetics, erosion and increased runoff, and the requirement for on-going management intervention
<b>Activity/Risk Source</b>	<ul style="list-style-type: none"> <li>» Temporary construction areas</li> <li>» Temporary access roads/tracks</li> <li>» Other disturbed areas/footprints</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» Ensure and encourage site rehabilitation of disturbed areas</li> <li>» Ensure that the site is appropriately rehabilitated following the execution of the works, such that residual environmental impacts (including erosion) are remediated or curtailed</li> </ul>

Mitigation: Action/Control	Responsibility	Timeframe
All temporary facilities, equipment, and waste materials (including spoil material) must be removed from site	Contractor	Following execution of the works
All temporary fencing and danger tape must be removed once the construction phase has been completed	Contractor	Following completion of construction

Mitigation: Action/Control	Responsibility	Timeframe
		activities in an area
The area that previously housed the construction equipment camp is to be checked for spills of substances such as oil, paint, etc. and these should be cleaned up	Contractor	Following completion of construction activities in an area
All hardened surfaces within the construction equipment camp area, not forming part of permanent laydown areas, should be ripped, all imported materials removed, and the area shall be top soiled and re-vegetated	Contractor	Following completion of construction activities in an area
Temporary roads must be closed and access across these blocked	Contractor	Following completion of construction activities in an area
Necessary drainage works and anti-erosion measures must be installed, where required, to minimise loss of topsoil and control erosion	Contractor	Following completion of construction activities in an area
Rehabilitation must be in line with the requirements of the landowner for the land use (except in those areas of remaining natural vegetation which are disturbed)	Contractor in consultation with rehabilitation specialist	Following completion of construction activities in an area
Re-vegetated areas may have to be protected from wind erosion and maintained until an acceptable plant cover has been achieved	Contractor in consultation with rehabilitation specialist	Post-rehabilitation
Erosion control measures should be used in sensitive areas	Contractor in consultation with rehabilitation specialist (if required)	Post-rehabilitation
Alien plant management must be undertaken as per the alien management and monitoring plan to be developed pre-construction	Contractor	Post-rehabilitation
Topsoil replaced on all areas and stabilised where practicable	Contractor	Rehabilitation

<b>Performance Indicator</b>	<ul style="list-style-type: none"><li>» All areas of site, including construction equipment camp and working areas, cleared of equipment and temporary facilities</li><li>» Topsoil replaced on all areas and stabilised where practicable or required after construction and temporarily utilised areas</li><li>» Disturbed areas rehabilitated and acceptable plant cover achieved on rehabilitated sites</li><li>» Appropriate vegetation utilised in rehabilitation activities</li><li>» Complete development area free of alien invasive plants</li></ul>
<b>Monitoring</b>	<ul style="list-style-type: none"><li>» On-going inspection of rehabilitated areas in order to determine effectiveness of rehabilitation measures implemented</li><li>» On-going alien plant monitoring and removal should be undertaken on an annual basis as per the alien monitoring and management plan to be developed pre-construction</li><li>» An incident reporting system must be used to record non-conformances to the EMPr</li></ul>

**MANAGEMENT PROGRAMME: OPERATION**

**CHAPTER 8**

**Overall Goal:** To ensure that the operation of the proposed infrastructure does not have unforeseen impacts on the environment and to ensure that all impacts are monitored and the necessary corrective action taken in all cases. In order to address this goal, it is necessary to operate the facility in a way that:

- » Ensures that operation activities are properly managed in respect of environmental aspects and impacts.
- » Enables the proposed facility operation activities to be undertaken without significant disruption to other land uses in the area, in particular with regard to farming practices, traffic and road use, and effects on local residents.
- » Minimises impacts on fauna using the site.

An Environmental Manager must ensure the implementation of the operational EMPr.

**8.1. Objectives**

In order to meet this goal, the following objectives have been identified, together With necessary actions and monitoring requirements.

***OBJECTIVE 1: Protection of Indigenous natural vegetation and fauna, and maintenance of rehabilitated areas***

Indirect impacts on vegetation and fauna during operation could result from maintenance activities and the movement of people and vehicles on site and in the surrounding area. In order to ensure the long-term environmental integrity of the site following construction, maintenance of the areas rehabilitated post-construction must be undertaken until these areas have successfully re-established.

<b>Project component/s</b>	<ul style="list-style-type: none"> <li>» Service roads utilised during regular maintenance</li> <li>» Areas disturbed during the construction phase and subsequently rehabilitated</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Disturbance to or loss of vegetation and/or habitat</li> </ul>
<b>Activity/Risk Source</b>	<ul style="list-style-type: none"> <li>» Movement of employee vehicles within and around site</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» Maintain minimised footprints of disturbance of vegetation/habitats on-site</li> </ul>

	» Ensure and encourage plant regrowth in non-operational areas of post-construction rehabilitation
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Mitigation: Action/Control	Responsibility	Timeframe
Vehicle movements must be restricted to designated roadways	Contractor and Proponent	Operation
No disturbance of vegetation outside of the project site must occur	Contractor and Proponent	Operation
Existing roads must be maintained to ensure limited erosion and impact on areas adjacent to roadways	Contractor and Proponent	Operation
An on-going alien plant monitoring and eradication programme must be implemented, where necessary	Contractor and Proponent	Operation

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» No further disturbance to vegetation or terrestrial faunal habitats</li> <li>» Continued improvement of rehabilitation efforts</li> <li>» No disturbance of vegetation outside of project site</li> </ul>
<b>Monitoring</b>	» Regular inspection to monitor plant regrowth/performance of rehabilitation efforts and weed infestation compared to natural/undisturbed areas

## **OBJECTIVE 2: Protection of avifauna**

During operation, electrocutions within the facility substation could potentially have a negative impact on a variety of bird species, particularly those species that regularly utilize the electrical infrastructure to perch, or breed and nest as well as those tolerant of disturbances e.g. crows, herons, sparrows, owls, kestrels, falcons and geese. Nesting of small passerine birds, crows or ravens on or within substation infrastructure may also lead to electrocutions and outages. Mitigation measures may reduce the number of electrocutions and outages, with the resulting impact significance being **Low**.

<b>Project Component/s</b>	<ul style="list-style-type: none"> <li>» Facility Substation Complex</li> <li>» Ancillaries</li> </ul>
<b>Potential Impact</b>	» Electrocution at Facility Substation Complex
<b>Activities/Risk Sources</b>	» Operation of the facility substation without appropriate mitigation measures
<b>Mitigation: Target/Objective</b>	» Maintain a low number of collision and electrocution events

Mitigation: Action/Control	Responsibility	Timeframe
Bird perch deterrents and physical exclusion barriers, frames and covers may reduce incidence of birds perching and nesting on substation infrastructure.	Contractor	Operation
No nests may be removed, without first consulting the Endangered Wildlife Trust's (EWT) Wildlife and Energy Programme (WEP).	Contractor	Operation
Bird perch deterrents and physical exclusion barriers, frames and covers may reduce incidence of birds perching and nesting on substation infrastructure.	Contractor	Operation/planning
Potential Faulting (caused by nesting and perching of birds on structures in the substation) may require detailed, site specific mitigation dependent on the precise design and equipment in the new substation. Upon completion of construction, or during planning, an avifaunal specialist is to be contacted to determine if mitigation is required and if so, what mitigation measures are to be implemented.	Contractor	Operation/planning

<b>Performance Indicator</b>	» Minimal collision or electrocution events
<b>Monitoring</b>	» Observation of electrocution or collision events with the power line » Monitor the substation area for mortalities

### **OBJECTIVE 3: Minimise soil degradation and erosion**

The soil on site may be impacted in terms of:

- » Soil degradation including erosion (by wind and water) and subsequent deposition elsewhere is of a concern across the entire site if not managed sufficiently.
- » Uncontrolled run-off relating to operational activities could also lead to accelerated erosion and possible sedimentation of drainage systems.
- » Degradation of the natural soil profile due to pollution.

<b>Project Component/s</b>	» Facility Substation Complex » Ancillaries
<b>Potential Impact</b>	» Soil degradation » Soil erosion



	<ul style="list-style-type: none"> <li>» Increased deposition of soil into drainage systems</li> <li>» Increased run-off over the site</li> </ul>
<b>Activities/Risk Sources</b>	<ul style="list-style-type: none"> <li>» Poor rehabilitation of cleared areas</li> <li>» Rainfall - water erosion of disturbed areas</li> <li>» Wind erosion of disturbed areas</li> <li>» Concentrated discharge of water from construction activity</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» Ensure rehabilitation of disturbed areas is maintained</li> <li>» Minimise soil degradation (i.e. wetting)</li> <li>» Minimise soil erosion and deposition of soil into drainage lines</li> <li>» Ensure continued stability of embankments/excavations</li> </ul>

<b>Mitigation: Action/Control</b>	<b>Responsibility</b>	<b>Timeframe</b>
Rehabilitate disturbance areas should the previous attempt be unsuccessful	Contractor	Operation
All bare areas should be revegetated with locally occurring species, to bind the soil and limit erosion potential.	Contractor	Operation
Maintain erosion control measures implemented during the construction and rehabilitation phases (i.e. run-off attenuation on slopes (sand bags, logs), silt fences, storm water catch-pits, and shade nets), if deemed necessary	Contractor	Operation

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» Minimal soil erosion around site</li> </ul>
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>» Immediate reporting of ineffective sediment control systems</li> <li>» An incident reporting system must record non-conformances according to the EMPr</li> </ul>

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**MANAGEMENT PROGRAMME: DECOMMISSIONING**

**CHAPTER 9**

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It is most likely that decommissioning activities of the infrastructure would comprise the disassembly and removal of the Project infrastructure.

Should the activity ever cease or become redundant, the applicant shall undertake the required actions as prescribed by legislation at the time and comply with all relevant legal requirements administered at any relevant and competent authority at that time.

The relevant mitigation measures contained under the construction EMPr (Chapter 6) should be applied during decommissioning, if still applicable at the time, and therefore is not repeated in this section. The EMPr for Rehabilitation (chapter 7) is also relevant to the decommissioning of the proposed infrastructure and must be adhered to. It must be noted that decommissioning activities will need to be undertaken in accordance with the legislation applicable at that time. This section of the EMPr will need to be revisited and amended at the time in accordance with the applicable legislation.

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## **FINALISATION OF THE EMPr**

## **CHAPTER 10**

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The EMPr is a dynamic document, which must be updated to include any additional specifications as and when required. This will ensure that the construction and operation activities are planned and implemented considering sensitive environmental features.

**APPENDIX A:  
PROPOSED GRIEVANCE MECHANISM FOR PUBLIC  
COMPLAINTS AND ISSUES**

## **GRIEVANCE MECHANISM / PROCESS**

### **AIM**

The aim of the grievance mechanism is to ensure that grievances / concerns raised by local landowners and or communities are addressed in a manner that is:

- » Fair and equitable;
- » Open and transparent;
- » Accountable and efficient.

The Proponent has an overarching Grievance Mechanism that will be implemented to ensure effective and efficient management of grievances/ concerns raised by local landowners and or communities.

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**APPENDIX B:  
CURRICULA VITAE FOR THE SAVANNAH  
ENVIRONMENTAL PROJECT TEAM AND SPECIALIST  
CONSULTANTS**

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