
PROPOSED BOSHOF - LES MARAIS / BUITENFONTEIN SOLAR ENERGY FACILITY, NEAR BOSHOF, FREE STATE PROVINCE

DRAFT ENVIRONMENTAL MANAGEMENT PROGRAMME

Submitted as part of the Final Basic Assessment Report

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PROJECT DETAILS

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DEFINITIONS AND TERMINOLOGY

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.

Archaeological material: Remains resulting from human activities which are in a state of disuse and are in or on land and which are older than 100 years, including artefacts, human and hominid remains and artificial features and structures.

Cumulative impacts: The impact of an activity that in itself may not be significant, but may become significant when added to the existing and potential impacts eventuating from similar or diverse activities or undertakings in the area.

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

'Do nothing' alternative: The 'do nothing' alternative is the option of not undertaking the proposed activity or any of its alternatives. The 'do nothing' alternative also provides the baseline against which the impacts of other alternatives should be compared.

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 Basic Assessment 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: An operational plan that organises and co-ordinates mitigation, rehabilitation and monitoring measures in order to guide the implementation of a proposal and its ongoing maintenance after implementation.

Fossil: Mineralised bones of animals, shellfish, plants and marine animals. A trace fossil is the track or footprint of a fossil animal that is preserved in stone or consolidated sediment.

Heritage: That which is inherited and forms part of the National Estate (Historical places, objects, fossils as defined by the National Heritage Resources Act of 2000).

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.

Photovoltaic effect: Electricity can be generated using photovoltaic panels (semiconductors) which are comprised of individual photovoltaic cells that absorb solar energy to produce electricity. The absorbed solar radiation excites the electrons inside the cells and produces what is referred to as the Photovoltaic Effect.

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.

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PROJECT DETAILS

CHAPTER 1

Bluewave Capital SA (Pty) Ltd (Bluewave Capital), an Independent Power Producer (IPP), is proposing the establishment of a small-scale commercial solar energy facility (using photovoltaic technology) of approximately 5 MW in capacity. The facility is proposed to be located approximately 5km south east of the town of Boshof, on the eastern point of the Farm Les Marais 137, in the Free State Province. The proposed project will be referred to as the **Boshof - Les Marais / Buitenfontein Solar Energy Facility**.

The purpose of the project is to generate electricity which will be fed-into the national electricity grid. The project will participate in the Department of Energy's Small Projects Renewable Energy Independent Power Producer Procurement Programme (REIPPP). The REIPPP Programme has been designed to contribute towards the South African government's renewable energy target of 17GW by 2030, and to stimulate the renewable industry in South Africa.

The facility development footprint will be less than 19.5 ha in extent within which the following infrastructure will be established:

- » Photovoltaic (PV) panels up to 4m in height (fixed or tracking technology) with a capacity of up to 5MW.
 - » Mounting structures to be either rammed steel piles or piles with pre-manufactured concrete footing to support the PV panels.
 - » Cabling between the project components, to be lain in trenches ~ 1-2m deep.
 - » Power inverters between the PV arrays ($\pm 4.5\text{m}^2$).
 - » Power lines to evacuate the power into the Eskom grid via the Bosplaat Rural Substation.
 - » Internal access roads (up to 7m wide).
 - » Water storage facilities/ reservoirs ($1\ 000\ \text{m}^3$).
 - » Office, workshop area for maintenance and storage (50m^2).
 - » During construction (temporary infrastructure) such as temporary housing for workers and a laydown area (~1 hectare in extent) will also be required.
- Fencing.

Through the environmental assessment of impacts associated with the Boshof - Les Marais / Buitenfontein Solar Energy Facility, both potentially positive and negative impacts were identified. All impacts were assessed to be of low significance.

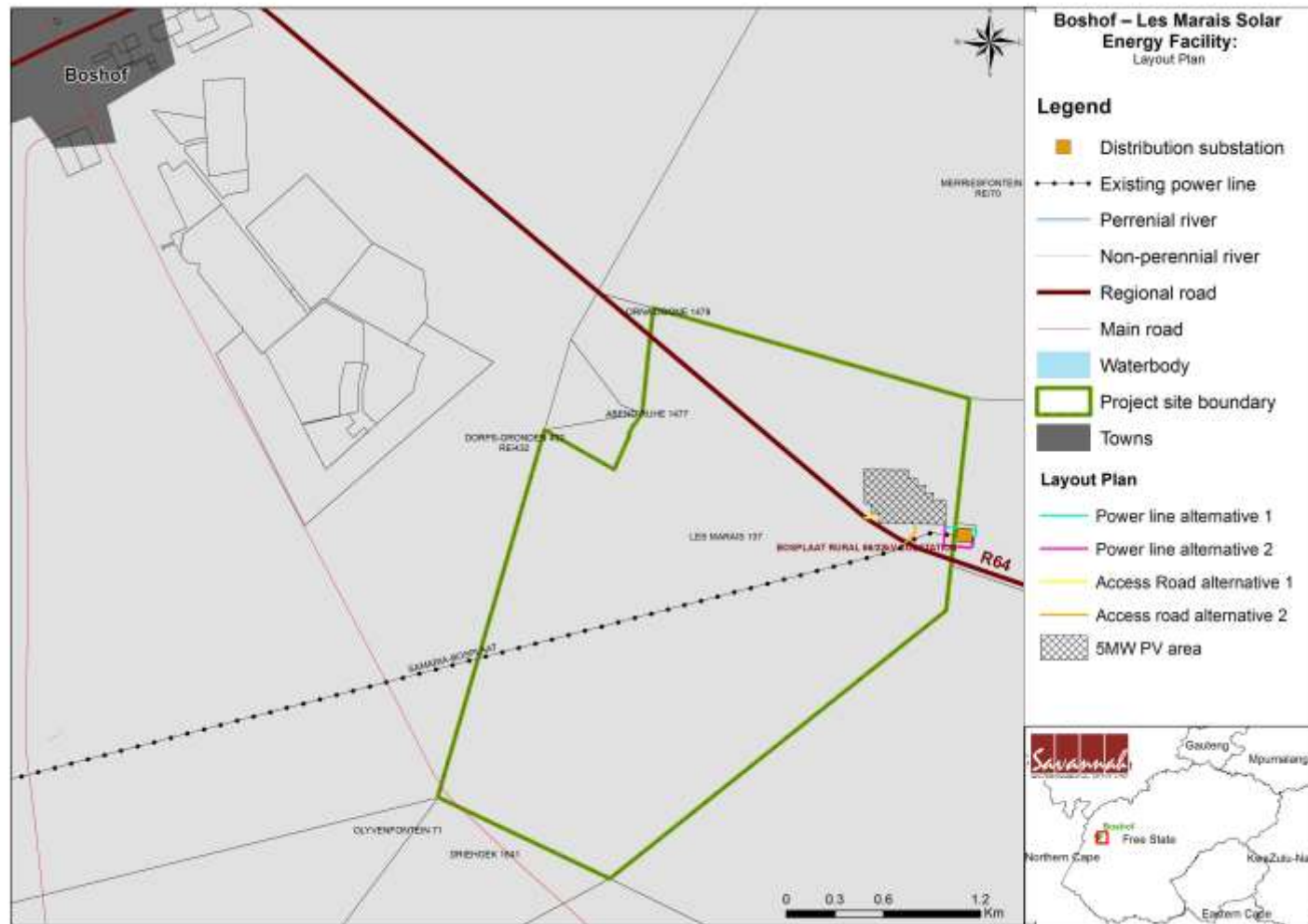


Figure 1.1: Locality map showing the development area for the proposed Boshof - Les Marais / Buitenfontein Solar Energy Facility

1.1. Activities and Components associated with the Construction Operation and Decommissioning Solar Energy Facility

Table 1.1: Activities associated with the construction of a PV facility

Main Activity/Project Component	Components of Activity	Details
Planning		
Conduct technical surveys	<ul style="list-style-type: none"> » Geotechnical survey by geotechnical engineer. » Site survey and confirmation of the infrastructure micro-siting footprint. 	<ul style="list-style-type: none"> » All surveys are to be undertaken prior to initiating construction.
Construction		
Undertake site preparation	<ul style="list-style-type: none"> » Clearance of vegetation at the infrastructure footprints. » Where required, some levelling of the land may occur. » Excavation of trenches for underground cables. 	<ul style="list-style-type: none"> » These activities will require the stripping of topsoil, which will need to be appropriately stockpiled for use in rehabilitation.
Construction of internal access roads	<ul style="list-style-type: none"> » Construct a 7 m wide gravel roads around the site. 	<ul style="list-style-type: none"> » The proposed internal access roads will be comprised of gravel tracks or compacted rock-fill.
Construct infrastructure foundations	<ul style="list-style-type: none"> » Mounting structures will either be pile driven, screwed or pre-cast concrete footings 	<ul style="list-style-type: none"> » Mounting structures will not involve the utilization of concrete, but would involve be pile driven, screwed or pre-cast concrete footings.
Transport of components and equipment to site	<ul style="list-style-type: none"> » Trucks will be used to transport all components to site: * The normal civil engineering construction equipment for the civil works (e.g. trucks, graders, compaction equipment, cement mixers, etc.). 	<ul style="list-style-type: none"> » The equipment will be transported to the site using appropriate National and Provincial routes, and the dedicated access/haul road to the site itself.
Establishment of PV panels	<ul style="list-style-type: none"> » PV panels are transported in containers. » The steel structures will be assembled on site. 	<ul style="list-style-type: none"> » The steel mounting structures, manufactured in South Africa, are custom made for the site. They are assembled on site.

Main Activity/Project Component	Components of Activity	Details
Connection of PV panels to the substation	» The PV panels will be connected to the on-site substation via underground cabling (where practical).	» The installation of these underground cables will require the excavation of trenches of approximately 400 mm – 1000 mm deep within which they can then be laid.
Connect substation to the grid	» The PV facility could possibly connect into the existing Bosplaat Rural Substation.	» The electricity generated at the site will run through underground cables.
Undertake site rehabilitation	» Remove all construction equipment from the site. » Rehabilitation of temporarily disturbed areas where practical and reasonable.	» On full commissioning of the facility (or a phase thereof), any access points to the site which are not required during the operation phase will be closed and prepared for rehabilitation.
Operation		
Operation	» PV panels. » Associated infrastructure.	» The operational phase is proposed to run for a period of approximately 20 years. » During this time, full time security, maintenance, supervision, and monitoring teams will be required on site. » The PV facility will be operational during daylight hours only but not under circumstances of mechanical breakdown, or maintenance activities. » No energy storage mechanisms (i.e. batteries) which would allow for continued generation at night or on cloudy days are proposed. » An estimated 50, 000 litres of water per annum would be required for cleaning of the panels and for offices and workshops and an estimated 3 million litres of water would be required for the construction of the plant.
Maintenance & Security	» Maintenance during the life cycle of the facility would include emergency repairs, routine panel	» The panels will be cleaned with water. » 24 hour on-site security, 2m – 5m high perimeter

Main Activity/Project Component	Components of Activity	Details
	maintenance, routine maintenance of medium voltage equipment and maintenance of the site.	fencing, and 1-2 security guards.
<i>Decommissioning</i>		
Site preparation	<ul style="list-style-type: none"> » Preparation of the site. » Mobilisation of construction equipment. 	<ul style="list-style-type: none"> » Depending on the economics of the development following the operational period, the plant will either be decommissioned or the operational phase will be extended. If it is deemed financially viable to continue, existing components may be disassembled and replaced with technology/ infrastructure available at that time. However, if the decision is made to decommission the facility the following activities will form part of the project scope.
Disassemble panels	<ul style="list-style-type: none"> » The panels will be disassembled and removed. 	<ul style="list-style-type: none"> » The components of the plant will be disassembled and removed. Thereafter they will be reused and recycled (where possible) or disposed of in accordance with regulatory requirements.

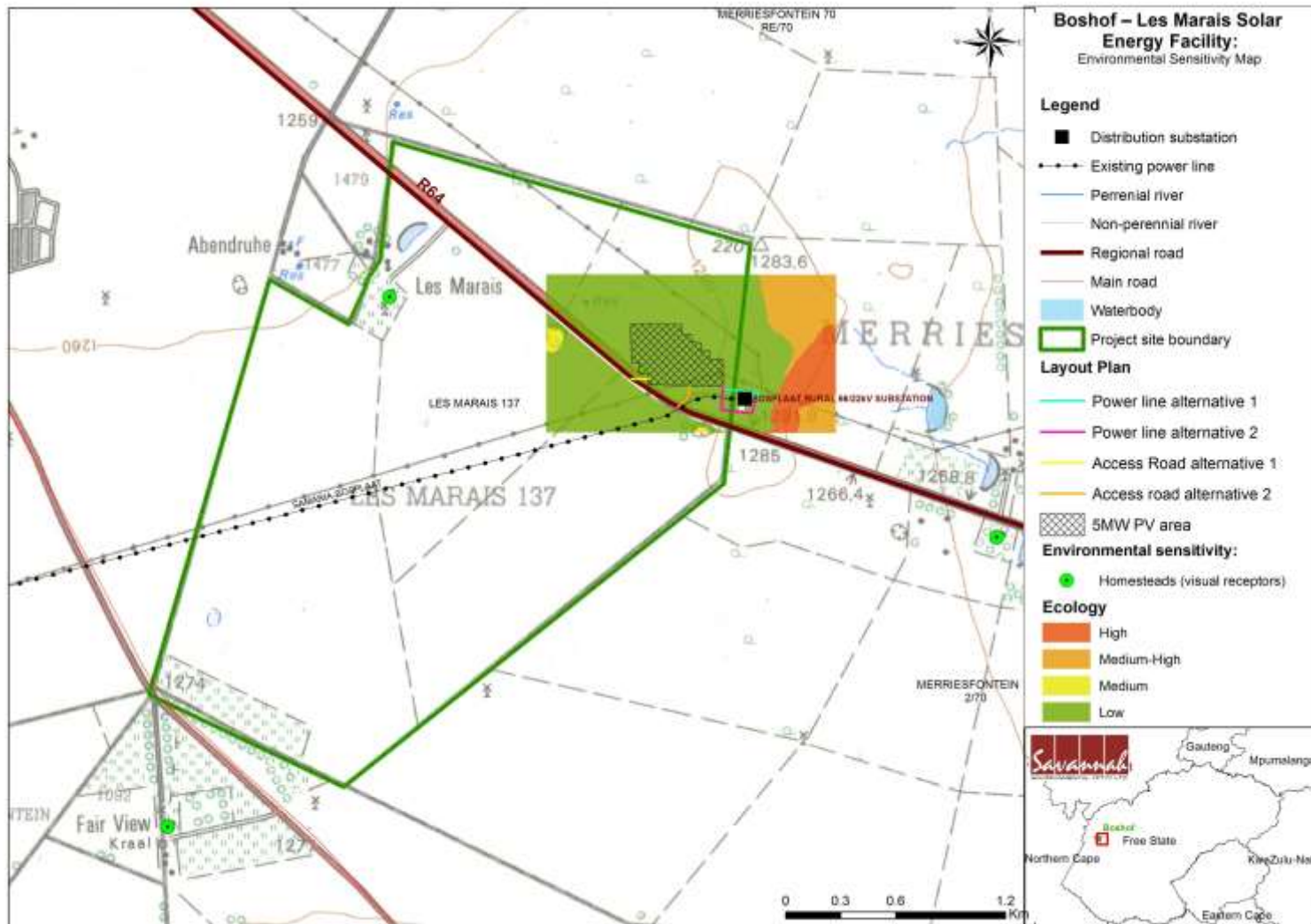


Figure 1.2: Sensitivity map for the Boshof - Les Marais / Buitenfontein Solar Energy Facility showing the development area in relation to identified environmentally sensitive areas

1.3. Benefits of the Proposed Project

Internationally there is increasing pressure on countries to increase their share of renewable energy generation due to concerns such as climate change and exploitation of resources. The South African Government has set a target for renewable energy of 17 GW all new installed generating capacity (new build) being derived from renewable energy forms, to be produced mainly from biomass, wind, solar and small-scale hydro.

Through pre-feasibility assessments and research, the viability of establishing a 5MW Solar energy facility in the Free State Province has been established by **Bluewave Capital SA (Pty) Ltd**. The positive implications of establishing a solar energy facility on the demarcated sites within the Free State include:

- » The project would assist the South African government in reaching their set targets for renewable energy.
- » The potential to harness and utilise good solar energy resources would be realised.
- » The consolidation of solar facility infrastructure within an area (specifically considering the proximity to the other solar facilities to be developed).
- » The National electricity grid in the Free State would benefit from the additional generated power.
- » Promotion of clean, renewable energy in South Africa.
- » Positive impacts on the tourism economy of the area.
- » Creation of local employment and business opportunities for the area.

The proposed development represents an investment in clean, renewable energy infrastructure, which, given the challenges created by climate change, represents a positive social benefit for society as a whole. The proposed project will not consume energy, but will instead provide a new source of clean, renewable electricity to the South African power grid. This generation of renewable power will aid in reducing the dependency on other power generation fuels and enhancing the reliability of the regional energy supply.

PURPOSE AND OBJECTIVES OF THE EMP

CHAPTER 2

An Environmental Management Programme (EMP) is defined as “an environmental management tool used to ensure that undue or reasonably avoidable adverse impacts associated with the planning, construction, operation and decommissioning of a project are avoided or mitigated, and that the positive benefits of the projects are enhanced.”¹ The objective of this EMP 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 EMP is to ensure continuous improvement of environmental performance, reducing negative impacts and enhancing positive effects during the construction and operation of the facility. An effective EMP is concerned with both the immediate outcome as well as the long-term impacts of the project.

The EMP provides specific environmental guidance for the construction and operation phases of a project, and is intended to manage and mitigate construction and operation 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 Construction and Operational Environmental Management Plan (CEMP and OEMP) has been compiled for the proposed Boshof - Les Marais / Buitenfontein Solar Facility. This EMP is applicable to all employees and contractors working on the pre-construction, construction, and operation and maintenance phases of the project. The document will be adhered to, updated as relevant throughout the project life cycle.

This EMP has been compiled in accordance with Section 33 of EIA Regulations and will be further developed in terms of specific requirements listed in any authorisations issued for the proposed project. The EMP has been developed as a set of environmental specifications (i.e. principles of environmental management), 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 various monitoring and implementation tools).

¹ Provincial Government Northern Cape, Department of Environmental Affairs and Development Planning: *Guideline for Environmental Management Plans*. 2005

This EMP has the following objectives:

- » Outline mitigation measures and environmental specifications which are required to be implemented for the planning, construction and rehabilitation, operation, and decommissioning phases of the project in order to manage and minimise the extent of potential environmental impacts associated with the facility.
- » Ensure that all the phases of the project do not result in undue or reasonably avoidable adverse environmental impacts, and ensure that any potential environmental benefits are enhanced.
- » Identify entities responsible for the implementation of the measures and outline functions and responsibilities.
- » 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 Basic Assessment process.

The management and mitigation measures identified within the Environmental Basic Assessment (BA) process are systematically addressed in this EMP, and ensure the minimisation of adverse environmental impacts to an acceptable level.

Bluewave Capital SA (Pty) Ltd must ensure that the implementation of the project complies with the requirements of all environmental authorisations, permits, and obligations emanating from relevant environmental legislation. This obligation is partly met through the development and the implementation of this EMP and through its integration into the contract documentation. Since this EMP is part of the Basic Assessment process for the proposed Boshof - Les Marais / Buitenfontein Solar Energy Facility, it is important that this document be read in conjunction with the final Basic Assessment Report compiled for this project. This will contextualise the EMP and enable a thorough understanding of its role and purpose in the integrated environmental management process. Should there be a conflict of interpretation between this EMP and the environmental authorisation, the stipulations in the environmental authorisation shall prevail over that of the EMP, unless otherwise agreed by the authorities in writing. Similarly, any provisions in legislation overrule any provisions or interpretations within this EMP.

This EMP shall be binding on all the parties involved in the construction and operational phases of the project, and shall be enforceable at all levels of contract and operational management within the project. The document must be adhered to, updated as relevant throughout the project life cycle.

STRUCTURE OF THIS EMP

CHAPTER 3

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

- » Key legislation applicable to the development;
- » Planning and design activities;
- » Construction activities;
- » Operation activities; and
- » Decommissioning activities.

These chapters set out the procedures necessary for Boshof - Les Marais / Buitenfontein Solar Energy Facility, as the project developer, 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 EMP has been structured in table format in order to show the links between the goals for each phase and their associated objectives, activities/risk sources, mitigation actions, monitoring requirements and performance indicators. A specific EMP table has been established for each environmental objective. The information provided within the EMP table for each objective is illustrated below:

OBJECTIVE: Description of the objective, which is necessary to meet the overall goals; which take into account the findings of the Basic Assessment specialist studies

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

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

Performance Indicator	Description of key indicator(s) that track progress/indicate the effectiveness of the EMP.
Monitoring	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 EMP tables are required to be reviewed and possibly modified whenever changes, such as the following, occur:

- » Planned activities change (i.e. in terms of the components and/or layout of the facility);
- » Modification to or addition to environmental objectives and targets;
- » Relevant legal or other requirements are changed or introduced; and
- » 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. Project Team

This draft EMP was compiled by:

	Name	Company
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	John Almond	Naturaviva
	Jaco van der Walt	Heritage Contracts and Archaeological Consulting
	Karen Hansen	Karen Hansen Landscape Architect
	Johann Lanz	Johann Lanz Consulting

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

KEY LEGISLATION APPLICABLE TO THE DEVELOPMENT CHAPTER 4

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

- » National Environmental Management Act (Act No 107 of 1998).
- » EIA Regulations, published under Chapter 5 of the NEMA (GNR R545, GNR 546 in Government Gazette 33306 of 18 June 2010).
- » Guidelines published in terms of the NEMA Basic Assessment Regulations, in particular:
 - * Companion to the National Environmental Management Act (NEMA) Environmental Impact Assessment (EIA) Regulations of 2010 (Draft Guideline; DEA, 2010).
 - * Public Participation in the Basic Assessment Process (DEA, 2010).
 - * Integrated Environmental Management Information Series (published by DEA).
- » International guidelines, including the Equator Principles.

Several other Acts, standards, or guidelines have also informed the project process and the scope of issues addressed and assessed in the Basic Assessment Report. 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 establishment of the proposed Boshof - Les Marais / Buitenfontein Solar Energy Facility

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
National Legislation			
National Environmental Management Act (Act No 107 of 1998)	<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 544 - 546 of June 2010 a Scoping and EIA Process is required to be undertaken for the proposed project.</p>	<p>Department of Environmental Affairs – competent authority</p> <p>Free State Department of Economic Development, Tourism and Environmental Affairs (FS DEDTEA) – commenting authority</p>	<p>The listed activities triggered by the proposed solar energy facility have been identified and assessed in the EIA process being undertaken (i.e. Scoping and EIA).</p> <p>This Basic Assessment Report will be submitted to the competent and commenting authority in support of the application for authorisation.</p>
National Environmental Management Act (Act No 107 of 1998)	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	Department of Environmental Affairs	While no permitting or licensing requirements arise directly by virtue of the proposed project, this section has found application during the EIA Phase through the

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
	<p>degradation of the environment associated with this project is avoided, stopped or minimised.</p> <p>In terms of NEMA, it has become the legal duty of a project proponent to consider a project holistically, and to consider the cumulative effect of a variety of impacts.</p>		<p>consideration of potential impacts (cumulative, direct, and indirect). It will continue to apply throughout the life cycle of the project.</p>
<p>Environment Conservation Act (Act No 73 of 1989)</p>	<p>National Noise Control Regulations (GN R154 dated 10 January 1992)</p>	<p>Department of Environmental Affairs</p> <p>Department of Environment and Nature Conservation</p> <p>Local Authorities</p>	<p>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. Therefore is no requirement for a noise permit in terms of the legislation.</p> <p>On-site activities should be limited to 6:00am - 6:00pm, Monday – Saturday (excluding public holidays).</p> <p>Should activities need to be undertaken outside of these times, the surrounding communities will need to be</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
			notified and appropriate approval will be obtained from DEA and the Local Municipality.
National Water Act (Act No 36 of 1998)	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.	Department of Water Affairs Provincial Department of Water Affairs	A water use license (WUL) is required to be obtained if drainage lines are impacts on. Currently no drainage lines occur on the site and will not be impacted by the proposed layout of the facility. Should water be abstracted from the borehole on site or any other natural resource for use within the facility, a water use license may be required.
National Water Act (Act No 36 of 1998)	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.	Department of Water Affairs Provincial Department of Water Affairs	This section of the Act will apply with respect to the potential impact on drainage lines, primarily during the construction phase (i.e. pollution from construction vehicles).
Minerals and Petroleum Resources Development Act (Act No 28 of 2002)	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	Department of Mineral Resources	As no borrow pits are expected to be required for the construction of the facility, no mining permit or right is required to be obtained.

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
	<p>the Act. Requirements for Environmental Management Programmes and Environmental Management Plans are set out in S39 of the Act.</p> <p>S53 Department of Mineral Resources: Approval from the Department of Mineral Resources (DMR) may be required to use land surface contrary to the objects of the Act in terms of section 53 of the Mineral and Petroleum Resources Development Act, (Act No 28 of 2002): In terms of the Act approval from the Minister of Mineral Resources is required to ensure that proposed activities do not sterilise a mineral resources that might occur on site</p>		<p>A Section 53 application will be submitted the Free State DMR office.</p>
<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>	<p>Department of Environmental Affairs</p>	<p>No permitting or licensing requirements arise from this legislation.</p> <p>The Act provides that an air quality officer may require any person to submit an atmospheric impact report if there is reasonable suspicion that the</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
			person has failed to comply with the Act.
National Heritage Resources Act (Act No 25 of 1999)	<p>S38 states that Heritage Impact Assessments (HIAs) are required for certain kinds of development including:</p> <ul style="list-style-type: none"> » The construction of a road, power line, pipeline, canal or other similar linear development or barrier exceeding 300 m in length; and » Any development or other activity which will change the character of a site exceeding 5 000 m² in extent. <p>Stand alone HIAs are not required where an EIA Process 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>	South African Heritage Resources Agency	<p>A permit may be required should identified cultural/heritage sites on site be required to be disturbed or destroyed as a result of the proposed development.</p> <p>A HIA has been undertaken as part of the Basic Assessment Process to identify heritage sites. The Middle Stone Age artefacts found are considered to be of low significance.</p>
National Environmental Management: Biodiversity Act (Act No 10 of 2004)	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	Department of Environmental Affairs	As the applicant will not carry out any restricted activity, as is defined in S1 of the Act, no permit is required to be obtained in this regard.

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
	<p>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 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</p>		<p>Specialist flora and fauna studies have been undertaken as part of the basic Assessment process. 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 the potential for them to be affected has been considered.</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
	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, (G 34809, GoN 1002), 9 December 2011).		
Conservation of Agricultural Resources Act (Act No 43 of 1983)	Regulation 15 of GNR1048 provides for the declaration of weeds and invader plants, and these are set out in Table 3 of GNR1048. Weeds are described as Category 1 plants, while invader plants are described as Category 2 and Category 3 plants. These regulations provide that Category 1, 2 and 3 plants must not occur on land and that such plants must be controlled by the methods set out in Regulation 15E.	Department of Agriculture	This Act will find application throughout the life cycle of the project. In this regard, soil erosion prevention and soil conservation strategies must be developed and implemented. In addition, a weed control and management plan must be implemented. The permission of agricultural authorities will be required if the Project requires the draining of vleis, marshes or water sponges on land outside urban areas.
National Forests Act (Act No. 84 of 1998)	» 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	National Department of Forestry	A permit would need to be obtained for any protected trees that are affected by the development.

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
	<p>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>» GN 1042 provides a list of protected tree species.</p>		
<p>National Veld and Forest Fire Act (Act 101 of 1998)</p>	<p>In terms of S21 the applicant would be obliged to burn firebreaks to ensure that should a veldfire occur on the property, that it does not spread to adjoining land.</p> <p>In terms of S12 the applicant must ensure that the firebreak is 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.</p> <p>In terms of S17, the applicant must have such equipment, protective clothing, and trained personnel for extinguishing fires.</p>	<p>Department of Water Affairs</p>	<p>While no permitting or licensing requirements arise from this legislation, and this Act will find application during the construction and operational phase of the project.</p>
<p>Hazardous Substances Act (Act No 15 of 1973)</p>	<p>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</p>	<p>Department of Health</p>	<p>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</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
	<p>inflammable nature or the generation of pressure thereby in certain instances and 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> <p>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 as Group I or Group II substance</p> <p>Group IV: any electronic product; and Group V: any radioactive material.</p> <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>operational context they are used, stored or handled. If applicable, a license is required to be obtained from the Department of Health.</p>
<p>Development Facilitation Act (Act No 67 of 1995)</p>	<p>Provides for the overall framework and administrative structures for planning</p>	<p>Local Municipality</p>	<p>The applicant must submit a land development application in the</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
	throughout the Republic. S(2 - 4) provide general principles for land development and conflict resolution.	District Municipality	prescribed manner and form as provided for in the Act. A land development applicant who wishes to establish a land development area must comply with procedures set out in the Act.
Subdivision of Agricultural Land Act (Act No 70 of 1970)	Details land subdivision requirements and procedures. Applies for subdivision of all agricultural land in the province	Local Municipality District Municipality	Subdivision will have to be in place prior to any subdivision approval in terms of S24 and S17 of the Act.
National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008)	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. The Minister may amend the list by – » Adding other waste management activities to the list. » Removing waste management activities from the list. » Making other changes to the particulars on the list. In terms of the Regulations published in terms of this Act (GN 718), A Basic Assessment or Environmental Impact	National Department of Water and Environmental Affairs Provincial Department of Environmental Affairs (general waste)	As no waste disposal site is to be associated with the proposed project, no permit is required in this regard. 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). The volumes of waste to be generated and stored on the site during construction and operation of the facility will not require a

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
	<p>Assessment is required to be undertaken for identified listed activities.</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"> » 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. » Adequate measures are taken to prevent accidental spillage or leaking. » The waste cannot be blown away. » Nuisances such as odour, visual impacts and breeding of vectors do not arise; and » Pollution of the environment and harm to health are prevented. 		<p>waste license (provided these remain below the prescribed thresholds).</p> <ul style="list-style-type: none"> » in excess of 100m³ of general waste » in excess of 35m³ of hazardous waste
<p>National Road Traffic Act (Act No 93 of 1996)</p>	<ul style="list-style-type: none"> » 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 	<ul style="list-style-type: none"> » South African National Roads Agency Limited (national roads) » Provincial Department of Transport 	<ul style="list-style-type: none"> » An abnormal load/vehicle permit may be required to transport the various components to site for construction. These include route clearances and permits will be required for vehicles

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
	<p>loads and vehicles on public roads and the detailed procedures to be followed in applying for exemption permits are described and discussed.</p> <ul style="list-style-type: none"> » 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. » 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>carrying abnormally heavy or abnormally dimensioned loads.</p> <ul style="list-style-type: none"> » Transport vehicles exceeding the dimensional limitations (length) of 22m. » Depending on the trailer configuration and height when loaded, some of the power station components may not meet specified dimensional limitations (height and width).
Provincial Legislation			
The Nature Conservation Ordinance 8 of 1969 and amendments	Lists plant and animal species as protected	Free State Department of Economic Development, Tourism and Environmental Affairs	Only <i>Boophone disticha</i> was observed at the site and is restricted to the rocky ridge and would not be impacted by the

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
			development. Although <i>Acacia erioloba</i> is common in the broader area.

MANAGEMENT PROGRAMME: PLANNING AND DESIGN CHAPTER 5

Overall Goal: undertake the planning and design phase in a way that:

- » Ensures that the design of the facility responds to the identified environmental constraints and opportunities.
- » Ensures that adequate regard has been taken of any landowner and community concerns and that these are appropriately addressed through design and planning (where appropriate).
- » Ensures that the best environmental options are selected for the linear components, including the access roads and power line alignments.
- » Enables the solar energy facility 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: Ensure the facility design responds to identified environmental constraints and opportunities

In order to minimise impacts associated with the construction and operation of the facility, the following is required to be undertaken during the final design phase:

- » Geotechnical survey – this will investigate flood potential, foundation conditions, potential for excavations, and the availability of natural construction materials. This study will serve to inform the type of foundations required to be constructed (i.e. for the substation), and the extent of earthworks and compaction required in the establishment of the internal access roads.
- » A storm-water management plan – this will detail how storm-water runoff (i.e. over engineered hard surfaces) can be managed to reduce velocities and volumes of water that could lead to erosion and potential sedimentation of drainage systems.

The implementation of the EMP within this area will minimise and/or mitigate impacts on the environment, specifically on the ecology of the project area.

Project Component/s	<ul style="list-style-type: none"> » PV panels. » Substation. » Access roads. » Power line.
Potential Impact	» Impact on identified sensitive areas.
Activities/Risk Sources	» Positioning of all the facilities components.
Mitigation: Target/Objective	<ul style="list-style-type: none"> » The design of the facility responds to the identified environmental constraints and opportunities. » Site sensitivities are taken into consideration and avoided as far as possible, thereby mitigating potential impacts.

Mitigation: Action/Control	Responsibility	Timeframe
Undertake a detailed geotechnical survey prior to the commencement of construction.	Geotechnical specialist	Design
Avoid identified sensitive areas within the site within the final design of the facility.	Engineering design consultant and Bluewave Capital SA (Pty) Ltd and EPC	Design review
Consider and incorporate design level mitigation measures recommended by the specialists as detailed within the Basic Assessment Report and relevant appendices.	Engineering design consultant, solar component supplier, and Bluewave Capital SA (Pty) Ltd and EPC	Design review
External access point and internal access road to be carefully planned to maximise road user safety.	Bluewave Capital SA (Pty) Ltd Design engineer/EPC Contractor and EPC	Design
Compile a comprehensive erosion and storm water management plan for hard surfaces as part of the final design of the project (refer to Appendix C for principles to be considered). This must include appropriate means for the handling of storm water within the site, e.g. separate clean and dirty water streams around the plant, install stilling basins to capture large volumes of run-off, trapping sediments, and reduce flow velocities (i.e. water used when washing the panels).	Bluewave Capital SA (Pty) Ltd design engineer and contractor and EPC	Design
Use bird-friendly power line towers and conductor designs.	Bluewave Capital SA (Pty) Ltd and EPC	Design

Mitigation: Action/Control	Responsibility	Timeframe
In designing the facility, use should be made of existing road infrastructure as far as possible. Where no road infrastructure exists, new roads should be placed within existing disturbed areas or management measures must be implemented to ensure minimum damage is caused to natural habitats.	Bluewave Capital SA (Pty) Ltd/ Design engineer and EPC	Design phase
Roads must be designed so that changes to surface water runoff are avoided or minimised and erosion is not initiated.	Bluewave Capital SA (Pty) Ltd/ Design engineer and EPC	Design phase
The facility should be designed in such a manner to allow surface and subsurface movement of water along drainage lines so as not to impede natural surface and subsurface flows. Drainage measures must promote the dissipation of storm water.	Bluewave Capital SA (Pty) Ltd/ Design engineer and EPC	Design phase
Submit a final layout to the DEA prior to the commencement of construction	Bluewave Capital SA (Pty) Ltd and EPC	Pre-construction
A traffic management plan must be prepared for site access roads to ensure no hazards result from increased traffic and that traffic flow is not adversely affected.	Bluewave Capital SA (Pty) Ltd and EPC	Pre-Construction

Performance Indicator	<ul style="list-style-type: none"> » The design meets the objectives and does not degrade the environment. » Design and layouts respond to the mitigation measures and recommendations in the Basic Assessment Report.
Monitoring	<ul style="list-style-type: none"> » Review of the design by the Project Manager and the Environmental Control Officer (ECO) prior to the commencement of construction.

OBJECTIVE: Ensure the selection of the best environmental option for the alignment of the power line and access roads

- » **Access Road** – An existing gravel access road will be upgraded and utilised to access the site. The existing gravel road is connected to the R377.
- » **Power line** – The proposed power line will be ~950m in length, connecting to the existing Bosplaat Rural Substation

Project	» Power line.
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Component/s	» Access roads.
Potential Impact	» Route that degrades the environment unnecessarily, particularly with respect to visual aesthetics, loss of indigenous flora, and erosion.
Activities/Risk Sources	» Alignment of power line within corridor. » Alignment of access roads.
Mitigation: Target/Objective	» To ensure selection of best environmental option for alignment of linear infrastructure. » Environmental sensitivities are taken into consideration and avoided as far as possible, thereby mitigating potential impacts.

Mitigation: Action/Control	Responsibility	Timeframe
Locate power line and access roads within disturbed corridors, as far as possible.	Bluewave Capital SA (Pty) Ltd and EPC	Prior to submission of the final construction layout plan
Consider design level mitigation measures recommended by the specialists as detailed within the Basic Assessment report and relevant appendices.	Bluewave Capital SA (Pty) Ltd and EPC	Design
Plan any new access roads according to contour lines to minimise cutting and filling operations.	Bluewave Capital SA (Pty) Ltd and EPC	Design

Performance Indicator	» Power line and road alignments meet environmental objectives. » Selected linear alignments that minimise any negative environmental impacts and maximise any benefits.
Monitoring	» Ensure that the design implemented meets the objectives and mitigation measures in the Basic Assessment Report through review of the design by the Project Manager, and the ECO prior to the commencement of construction.

OBJECTIVE: Minimise storm water runoff (guideline for storm water management plan)

Management of storm water will be required during the construction phase of the facility. A detailed storm water management plan is required to be compiled as part of the final design to ensure compliance with applicable regulations and to prevent off-site migration of contaminated storm water or increased soil erosion.

The section below provides a guideline for the management of storm water on site and will need to be supplemented with the relevant method statements during the construction phase of the facility.

Project Component/s	<ul style="list-style-type: none"> » Storm water management components. » Any hard engineered surfaces (i.e. access roads).
Potential Impact	<ul style="list-style-type: none"> » Poor storm water management and alteration of the hydrological regime (i.e. drainage lines).
Activities/Risk Sources	<ul style="list-style-type: none"> » Construction of the facility (i.e. placement of hard engineered surfaces).
Mitigation: Target/Objective	<ul style="list-style-type: none"> » Appropriate management of storm water to minimise impacts on the environment.

Mitigation: Action/Control	Responsibility	Timeframe
A Method Statement for the management of storm water which also considers the recommendations below is to be submitted to the ECO prior to commencement of construction activities.	Bluewave Capital SA (Pty) Ltd and EPC	Pre-construction
Reduce the potential increase in surface flow velocities and the resultant impact on the localised drainage system as a result of increased sedimentation through the implementation of appropriate erosion management measures.	Bluewave Capital SA (Pty) Ltd and EPC	Planning and design
Appropriately plan hard-engineered bank erosion protection structures.	Bluewave Capital SA (Pty) Ltd and EPC	Planning and design
Ensure suitable handling of storm water within the site (i.e. separate clean and dirty water streams around the plant and install stilling basins to capture large volumes of run-off, trapping sediments and reduce flow velocities) through appropriate design of the facility.	Bluewave Capital SA (Pty) Ltd and EPC	Construction and operation
Design measures for storm water management need to allow for surface and subsurface movement of water along drainage lines so as not to impede natural surface and subsurface flows.	Bluewave Capital SA (Pty) Ltd and EPC	Planning and design

Performance Indicator	<ul style="list-style-type: none"> » Appropriate storm water management measures included within the facility design. » Sound water quality and quantity management during construction and operation.
Monitoring	<ul style="list-style-type: none"> » Devise a suitable surface water quality monitoring plan for implementation during construction and operation.

OBJECTIVE: Protection of avifauna

Given the proximity of the PV facility to the Bosplaat Rural Substation and the short length of the line, the risk to avifauna is not considered to be of high significance however the following mitigation measures must be noted.

Project Component/s	» Power line.
Potential Impact	» Collision and electrocution events with the overhead power line.
Activities/Risk Sources	» Operation of the power line without mitigation measures. .
Mitigation: Target/Objective	» Maintain a low number of collision, and electrocution events. » Ensure bird-friendly tower designs are implemented to minimise the risk of electrocutions.

Mitigation: Action/Control	Responsibility	Timeframe
Ensure bird-friendly tower designs are implemented to minimise the risk of electrocutions. Fit overhead power lines with appropriate flappers to increase the visibility thereof to avifauna.	Bluewave Capital SA (Pty) Ltd and EPC	Design and Construction
Notes of electrocution and collision events must be sent to a qualified Ornithologist for the recommendation of further mitigation measures if necessary.	ECO and avifauna specialist and EPC	Operation

Performance Indicator	» Minimal collision, or electrocution events.
Monitoring	» Observation of electrocution or collision events with the power line. » Monitor power line servitudes for mortalities.

OBJECTIVE: 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 solar energy facility. Any issues and concerns raised should be addressed as far as possible in as short a timeframe as possible.

Project component/s	» Solar energy facility and associated infrastructure
Potential Impact	» Impacts on affected and surrounding landowners and land uses
Activity/risk source	» Activities associated with solar energy facility construction » Activities associated with solar energy facility operation
Mitigation: Target/Objective	» Effective communication with affected and surrounding landowners » Addressing of any issues and concerns raised as far as possible in as short a timeframe as possible

Mitigation: Action/control	Responsibility	Timeframe
Compile and implement a grievance mechanism procedure for the public (as outlined in Appendix A) to be implemented during both the construction and operational phases of the facility. This procedure should include details of the contact person who will be receiving issues raised by interested and affected parties, and the process that will be followed to address issues.	Bluewave Capital SA (Pty) Ltd and EPC	Pre-construction (construction procedure) Pre-operation (operation procedure)
Develop and implement a grievance mechanism for the construction, operational and closure phases of the project for all employees, contractors, subcontractors and site personnel. This procedure should be in line with the South African Labour Law.	Bluewave Capital SA (Pty) Ltd/ Contractor and EPC	Pre-construction (construction procedure) Pre-operation (operation procedure)
Liaison with landowners is to be undertaken prior to the commencement of construction in order to provide sufficient time for them to plan agricultural activities.	Bluewave Capital SA (Pty) Ltd/ Contractor and EPC	Pre-construction

Performance Indicator	» Effective communication procedures in place.
Monitoring	» An incident reporting system should be used to record non-conformances to the EMP.

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 noise impacts, farming practices, traffic and road use, and effects on local residents.
- » Minimises the impact on any remaining indigenous natural vegetation and habitats of ecological value (i.e. drainage lines).
- » Minimises impacts on fauna using the site.
- » Minimises the impact on heritage site should they be uncovered.

6.1 Institutional Arrangements: Roles and Responsibilities for the Construction Phase

As the proponent, Bluewave Capital SA (Pty) Ltd must ensure that the implementation of the facility 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 EMP, and the implementation of the EMP through its integration into the contract documentation. Bluewave Capital SA (Pty) Ltd will retain various key roles and responsibilities during the construction of the facility.

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

Formal responsibilities are necessary to ensure that key procedures are executed. Specific responsibilities of the Project Manager; Site Manager; Safety, Health and Environment Representative; Environmental Control Officer (ECO) and Contractor for the construction phase of this project are as detailed below.

Project Manager will:

- » Ensure all specifications and legal constraints specifically with regards to the environment are highlighted to the Contractor(s) so that they are aware of these.

- » Ensure that Bluewave Capital SA (Pty) Ltd and its Contractor(s) are made aware of all stipulations within the EMP.
- » Ensure that the EMP is correctly implemented throughout the project by means of site inspections and meetings. This will be documented as part of the site meeting minutes.
- » Be fully conversed with the Basic Assessment for the project, the EMP, the conditions of the Environmental Authorisation (once issued), and all relevant environmental legislation.

Site Manager (Bluewave Capital SA (Pty) Ltd on-site Representative) will:

- » Be fully knowledgeable with the contents of the Basic Assessment and risk management.
- » Be fully knowledgeable with the contents and conditions of the Environmental Authorisation (once issued).
- » Be fully knowledgeable with the contents of the EMP.
- » Be fully knowledgeable with the contents of all relevant environmental legislation, and ensure compliance with these.
- » Have overall responsibility of the EMP and its implementation.
- » Conduct audits to ensure compliance to the EMP.
- » 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 **Environmental Control Officer** (ECO) must be appointed by Bluewave Capital SA (Pty) Ltd 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 EMP and the conditions of the Environmental Authorisation. Accordingly, the ECO will:

- » Be fully knowledgeable with the contents with the EIA.
- » Be fully knowledgeable with the contents with the conditions of the Environmental Authorisation (once issued).
- » Be fully knowledgeable with the contents with the EMP.
- » Be fully knowledgeable with the contents with 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 EMP is monitored through regular and comprehensive inspection of the site and surrounding areas.

- » Ensure that if the EMP conditions or specifications are not followed then appropriate measures are undertaken to address this.
- » 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 appropriate measures are undertaken to address any non-compliances recorded.
- » Ensure that a removal is ordered of any person(s) and/or equipment responsible for any contravention of the specifications of the EMP.
- » 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.
- » Independently report to DEA in terms of compliance with the specifications of the EMP and conditions of the Environmental Authorisation (once issued).
- » Keep record of all activities on site, problems identified, transgressions noted and a task schedule of tasks undertaken by the ECO.

As a general mitigation strategy, the Environmental Control Officer (ECO) should be present for the site preparation and initial clearing activities to ensure the correct demarcation of no-go areas, facilitate environmental induction with construction staff and supervise any flora relocation and faunal rescue activities that may need to take place during the site clearing (i.e. during site establishment, and excavation of foundations). Thereafter weekly site compliance inspections would probably be sufficient, provided that compliance with the requirements of the Environmental Authorisation, EMP and environmental legislation is maintained. In the absence of the ECO there should be a designated environmental officer present to deal with any environmental issues that may arise such as fuel or oil spills. The ECO shall remain employed until all rehabilitation measures, as required for implementation due to construction damage, are completed and the site handed over for operation.

Contractors and Service Providers: It is important that contractors are aware of the responsibilities in terms of the relevant environmental legislation and the contents of this EMP. 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 contractor's 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.
- » A copy of the EMP must be easily accessible to all on-site staff members.
- » Employees must be familiar with the requirements of this EMP and the environmental specifications as they apply to the construction of the proposed facility.
- » Prior to commencing any site works, all employees and sub-contractors must have attended an environmental awareness training course which must provide staff with an appreciation of the project's environmental requirements, and how they are to be implemented.
- » Staff will be informed of environmental issues as deemed necessary by the ECO.

All contractors (including sub-contractors and staff) and service providers are ultimately responsible for:

- » Ensuring adherence to the environmental management specifications.
- » Ensuring that Method Statements are submitted to the Site Manager (and ECO) for approval before any work is undertaken.
- » Any lack of adherence to the above will be considered as non-compliance to the specifications of the EMP.
- » Ensuring that any instructions issued by the Site Manager on the advice of the ECO are adhered to.
- » Ensuring that a report is tabled at each site meeting, which will document all incidents that have occurred during the period before the site meeting.
- » Ensuring that a register is kept in the site office, which lists all transgressions issued by the ECO.
- » Ensuring that a register of all public complaints is maintained.
- » Ensuring that all employees, including those of sub-contractors receive training before the commencement of construction in order that they can constructively contribute towards the successful implementation of the EMP (i.e. ensure their staff are appropriately trained as to the environmental obligations).

Contractor's Safety, Health and Environment Representative: The Contractor's Safety, Health and Environment (SHE) Representative, employed by the Contractor, is responsible for managing the day-to-day on-site implementation of this EMP, and for the compilation of regular Monitoring Reports. In addition, the SHE must act as liaison and advisor 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 SHE 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 EMP-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: Minimise impacts related to inappropriate site establishment

The movement of workers on site and layout of the construction camp needs to be well management in order to reduce the environmental impacts.

Project Component/s	<ul style="list-style-type: none"> » Area infrastructure (i.e. PV panels, and substation). » Linear infrastructure (i.e. power line, and access roads).
Potential Impact	<ul style="list-style-type: none"> » Hazards to landowners and public. » Damage to indigenous natural vegetation, due largely to ignorance of where such areas are located. » Loss of threatened plant species
Activities/Risk Sources	<ul style="list-style-type: none"> » Open excavations (foundations and cable trenches). » Movement of construction vehicles in the area and on-site.
Mitigation: Target/Objective	<ul style="list-style-type: none"> » To secure the site against unauthorised entry. » To protect members of the public/landowners/residents. » No loss of or damage to sensitive vegetation in areas outside the immediate development footprint.

Mitigation: Action/Control	Responsibility	Timeframe
Secure site, working areas and excavations in an appropriate manner, as agreed with the ECO.	Contractor and EPC	Site establishment, and duration

Mitigation: Action/Control	Responsibility	Timeframe
		of construction
Where necessary to control access, fence, and secure area (especially relevant to no-go areas).	Contractor and EPC	Site establishment, and duration of construction
Contractors and construction workers must be adequately informed of any no-go areas identified on the site and in the surrounding areas.	Bluewave Capital SA (Pty) Ltd and EPC	Construction
Adequate measures must be implemented to prevent unauthorised access to the working area and the internal access/haul routes.	Contractor and EPC	Site establishment, and duration of construction
Fence and secure contractor's equipment camp.	Contractor and EPC	Site establishment
The construction camp used to house equipment should be located in a disturbed area and must be screened off as far as practical during the entire construction phase.	Contractor and EPC	Erection: during site establishment Maintenance: for duration of Contract
Establish appropriately bunded areas for storage of hazardous materials (i.e. fuel to be required during construction).	Contractor and EPC	Site establishment
All unattended open excavations shall be adequately demarcated and/or fenced.	Contractor and EPC	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 locations on site.	Contractor and EPC	Site establishment, and duration of construction
Ablution or sanitation facilities should not be located within 100 m from a 1:100 year flood line (if any) including drainage lines.	Contractor and EPC	Site establishment, and duration of construction
Supply adequate waste collection bins at site where construction is being undertaken. Separate bins should be provided for general and hazardous waste. As far as possible, provision should be made for separation of waste for recycling.	Contractor and EPC	Site establishment, and duration of construction
The Contractor must take all reasonable measures to ensure the safety of the public in the surrounding area. Where the public could be	Contractor and EPC	Site establishment, and duration of construction

Mitigation: Action/Control	Responsibility	Timeframe
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. All unattended open excavations shall be adequately demarcated and/or fenced (fencing shall consist of a minimum of three strands of wire wrapped with danger tape. Adequate protective measures must be implemented to prevent unauthorised access to the working area and the internal access/haul routes.		

Performance Indicator	<ul style="list-style-type: none"> » Site is secure and there is no unauthorised entry. » No members of the public/ landowners injured. » Appropriate and adequate waste management and sanitation facilities provided at construction site.
Monitoring	<ul style="list-style-type: none"> » An incident reporting system will be used to record non-conformances to the EMP. » ECO to monitor all construction areas on a continuous basis until all construction is completed. Non-conformances will be immediately reported to the site manager.

OBJECTIVE: Appropriate management of the construction site and construction workers

The construction phase of the PV facility is expected to extend over a period of 8-10 months and create approximately 80 employment opportunities. Ideally low skilled and semi-skilled positions will be filled by locals living in and around the study area (from towns such as Boshof). This will however be dependent on the skills availability in the area.

Project Component/s	» Area and linear infrastructure.
Potential Impact	<ul style="list-style-type: none"> » Damage to indigenous natural vegetation and sensitive areas. » Damage to and/or loss of topsoil (i.e. pollution, compaction etc.). » Impacts on the surrounding environment due to inadequate sanitation and waste removal facilities. » Pollution/contamination of the environment.
Activities/Risk	» Vegetation clearing and levelling of equipment storage area/s.

Sources	<ul style="list-style-type: none"> » Access to and from the equipment storage area/s. » Ablution facilities. » Contractors not aware of the requirements of the EMP, leading to unnecessary impacts on the surrounding environment.
Mitigation: Target/Objective	<ul style="list-style-type: none"> » Limit equipment storage within demarcated designated areas. » Ensure adequate sanitation facilities and waste management practices. » Ensure appropriate management of actions by on-site personnel in order to minimise impacts to the surrounding environment.

Mitigation: Action/Control	Responsibility	Timeframe
The siting of the construction equipment camp/s must take cognisance of any sensitive areas identified by the Basic Assessment studies. The location of this construction equipment camp/s shall be approved by the project ECO.	Contractor and EPC	Pre-construction
As far as possible, minimise vegetation clearing and levelling for equipment storage areas.	Contractor and EPC	Site establishment, and during construction
Rehabilitate all disturbed areas at the construction equipment camp as soon as construction is complete within an area.	Contractor and EPC	Duration of Contract
Ensure waste removal facilities are maintained and emptied on a regular basis.	Contractor and EPC	Site establishment, and duration of construction
The terms of this EMP and the Environmental Authorisation (once issued) must be included in all tender documentation and Contractors contracts	Bluewave Capital SA (Pty) Ltd and EPC	Tender process
Ensure that all personnel have the appropriate level of environmental awareness and competence to ensure continued environmental due diligence and on-going minimisation 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.	Contractor and EPC	Duration of construction
Contractors must use chemical toilets/ablution facilities situated at designated areas of the site; no ablution activities will be permitted outside the designated areas. These facilities must be regularly serviced by appropriate contractors. A minimum of one toilet shall be provided per 15 persons at each working area such as the Contractor's camp.	Contractor and sub-contractor/s and EPC	Duration of contract

Mitigation: Action/Control	Responsibility	Timeframe
Cooking and eating of meals must take place in a designated area. No fires are allowed on site. No firewood or kindling may be gathered from the site or surrounds.	Contractor and sub-contractor/s and EPC	Duration of contract
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 and EPC	Duration of contract
No one other than the ECO or personnel authorised by the ECO may disturb flora or fauna outside of the demarcated construction area/s.	Contractor and sub-contractor/s and EPC	Duration of contract
Fire fighting equipment and training must be provided before the construction phase commences.	Contractor and sub-contractor/s and EPC	Duration of contract
Draft and implement a Code of conduct for construction workers.	Contractor and sub-contractor/s and EPC	Pre-construction
Contractors must ensure that all workers are informed at the outset of the construction phase of the conditions contained in the Code of Conduct, specifically consequences of stock theft and trespassing on adjacent farms.	Contractor and sub-contractor/s and EPC	Construction
On completion of the construction phase, all construction workers must leave the site within one week of their contract ending.	Contractor and sub-contractor/s and EPC	Construction
Develop and implement a grievance mechanism for the construction, operational and closure phases of the project for all employees, contractors, subcontractors and site personnel. This procedure should be in line with the South African Labour Law.	Bluewave Capital SA (Pty) Ltd/ Contractor and EPC	Pre-construction

Performance Indicator	<ul style="list-style-type: none"> » The construction camps have avoided sensitive areas, as approved by the ECO. » Ablution and waste removal facilities are in a good working order and do not pollute the environment due to mismanagement. » All areas are rehabilitated promptly after construction in an area is complete. » Excess vegetation clearing and levelling is not reported by the ECO.
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	<ul style="list-style-type: none"> » No complaints regarding contractor behaviour or habits. » Appropriate training of all staff is undertaken prior to them commencing work on the construction site. » Code of Conduct drafted before commencement of construction phase.
Monitoring	<ul style="list-style-type: none"> » Regular audits of the construction camps and areas of construction on site by the ECO. » Proof of disposal of sewage at an appropriate wastewater treatment works. » An incident reporting system should be used to record non-conformances to the EMP. » Observation and supervision of Contractor practices throughout construction phase by the ECO. » Complaints will be investigated and, if appropriate, acted upon. » An incident reporting system will be used to record non-conformances to the EMP.

OBJECTIVE: Maximise local employment and business opportunities associated with the construction phase

Although limited, employment opportunities could be created during the construction phase (i.e. approximately 80), specifically for semi-skilled and unskilled workers.

Project Component/s	» Construction and establishment activities associated with the establishment of the PV facility, including infrastructure etc.
Potential Impact	» The opportunities and benefits associated with the creation of local employment and business should be maximised.
Activities/Risk Sources	» The employment of outside contractors to undertake the work and who make use of their own labour will reduce the employment and business opportunities for locals. Employment of local labour will maximise local employment opportunities.
Mitigation: Target/Objective	<ul style="list-style-type: none"> » Bluewave Capital SA (Pty) Ltd, in discussions with the Ditsobotla Local Municipality, should aim to employ the majority of the low-skilled workers from the local area. This should also be made a requirement for all contractors. » Bluewave Capital SA (Pty) Ltd should also develop a database of local BEE service providers

Mitigation: Action/Control	Responsibility	Timeframe
Attempt to employ a majority of the low-	Bluewave Capital	Employment and

Mitigation: Action/Control	Responsibility	Timeframe
skilled workers from the local area.	SA (Pty) Ltd & contractors and EPC	business policy document that sets out local employment targets to be in place before construction phase commences.
Where required, implement appropriate training and skills development programmes prior to the initiation of the construction phase to ensure that local employment target is met.	Bluewave Capital SA (Pty) Ltd and EPC	Where required, training and skills development programmes to be initiated prior to the initiation of the construction phase
Skills audit to be undertaken to determine training and skills development requirements.	Bluewave Capital SA (Pty) Ltd and EPC	Skills audit to determine need for training and skills development programme undertaken within 1-month of commencement of construction phase commences.
Develop a database of local BEE service providers and ensure that they are informed of tenders and job opportunities.	Bluewave Capital SA (Pty) Ltd and EPC	Database of potential local BEE services providers to be completed before construction phase commences.
Identify potential opportunities for local businesses.	Bluewave Capital SA (Pty) Ltd and EPC	Pre-construction

Performance Indicator	<ul style="list-style-type: none"> » Employment and business policy document that sets out local employment and targets completed before construction phase commences; » Majority of semi and unskilled labour locally sourced. » Database of potential local BEE services providers in place before construction phase commences. » Skills audit to determine need for training and skills development programme undertaken within 1 month of commencement of construction phase.
Monitoring	<ul style="list-style-type: none"> » Bluewave Capital SA (Pty) Ltd and or appointed ECO must monitor indicators listed above to ensure that they have been met for the construction phase.

OBJECTIVE: Minimise impacts related to traffic management and transportation of equipment and materials to site (Traffic Management and Transportation Plan)

The construction phase of the project will be the most significant in terms of generating traffic impacts; resulting from the transport of equipment and materials and construction crews to the site and the return of the vehicles after delivery of materials. Potential impacts associated with transportation and access relate to works within the site boundary and external works outside the site boundary.

The components for the proposed facility will be transported to site by road. An existing gravel access road will be upgraded and utilised to access the site. The existing gravel road is connected to the R64.

The section below provides a guideline for the Traffic Management and Transportation Plan on site and will need to be supplemented with the relevant final transport plan devised by the EPC partner during the final design phase of the facility.

Project Component/s	» Delivery of any component required within the construction phase.
Potential Impact	<ul style="list-style-type: none"> » Impact of heavy construction vehicles on road surfaces, and possible increased risk in accidents involving people and animals. » Traffic congestion, particularly on narrow roads or on road passes where overtaking is not permitted. » Deterioration of road pavement conditions (both surfaced and gravel road) due to abnormal loads.
Activities/Risk Sources	<ul style="list-style-type: none"> » Construction vehicle movement. » Speeding on local roads. » Degradation of local road conditions. » Site preparation and earthworks. » Foundations or plant equipment installation. » Transportation of ready-mix concrete from off-site batching plant to the site. » Mobile construction equipment movement on-site. » Power line and substation construction activities.
Mitigation: Target/Objective	<ul style="list-style-type: none"> » Minimise impact of traffic associated with the construction of the facility on local traffic volume, existing infrastructure, property owners, animals, and road users. » To minimise potential for negative interaction between pedestrians or sensitive users and traffic associated with the facility construction

- » To ensure all vehicles are roadworthy and all materials/equipment are transported appropriately and within any imposed permit/licence conditions

Mitigation: Action/Control	Responsibility	Timeframe
The contractor's plans, procedures and schedules should be communicated with affected parties prior to the commencement of construction activities on site.	Bluewave Capital SA (Pty) Ltd and Contractor and EPC	Pre-construction
Source general construction material and goods locally where available to limit transportation over long distances.	Bluewave Capital SA (Pty) Ltd and Contractor and EPC	Pre-construction and construction
Appropriate dust suppression techniques must be implemented to minimise dust from gravel roads.	Bluewave Capital SA (Pty) Ltd and EPC	Construction
Construction vehicles and those transporting materials and goods should be inspected by the contractor or a sub-contractor to ensure that these are in good working order and not overloaded.	Contractor and EPC	Construction
Strict vehicle safety standards should be implemented and monitored.	Bluewave Capital SA (Pty) Ltd, Contractor and ECO and EPC	Construction
All relevant permits for abnormal loads must be applied for from the relevant authority.	Contractor (or appointed transportation contractor) and EPC	Pre-construction
A designated access to the proposed site must be created to ensure safe entry and exit.	Contractor and EPC	Pre-construction
No deviation from approved transportation routes must be allowed, unless roads are closed for whatever reason outside the control of the contractor.	Contractor and EPC	Duration of contract
Appropriate road management strategies must be implemented on external and internal roads with all employees and contractors required to abide by standard road and safety procedures.	Contractor (or appointed transportation contractor) and EPC	Pre-construction
Any traffic delays because of construction traffic must be co-ordinated with the appropriate authorities.	Contractor and EPC	Duration of contract
The movement of all vehicles within the site must be	Contractor and	Duration of

Mitigation: Action/Control	Responsibility	Timeframe
on designated roadways.	EPC	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 and EPC	Duration of contract
Appropriate maintenance of all vehicles of the contractor must be ensured.	Contractor and EPC	Duration of contract
All vehicles of the contractor 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 and EPC	Duration of contract
Keep hard road surfaces as narrow as possible.	Contractor and EPC	Duration of contract
Signs must be placed along construction roads to identify speed limits, travel restrictions and other standard traffic control information.	Contractor and EPC	Duration of contract

Performance Indicator	<ul style="list-style-type: none"> » Vehicles keeping to the speed limits. » Vehicles are in good working order and safety standards are implemented. » Local residents and road users are aware of vehicle movements and schedules. » No construction traffic related accidents are experienced. » Local road conditions and road surfaces are up to standard. » Complaints of residents are not received (e.g. concerning the speeding of heavy vehicles).
Monitoring	<ul style="list-style-type: none"> » Developer and or appointed ECO must monitor indicators listed above to ensure that they have been implemented.

OBJECTIVE: To avoid and or minimise the potential impact on current and future farming activities during the construction phase.

Construction activities of the proposed facility could lead to the loss of productive farm land. The site proposed for development is not cultivated but is utilised for grazing.

Project component/s	<ul style="list-style-type: none"> » Construction phase activities associated with the establishment of the PV facility and associated infrastructure.
Potential Impact	<ul style="list-style-type: none"> » The footprint of the solar energy facility and associated infrastructure will result in a loss of land that will impact on farming activities on the site.
Activities/risk sources	<ul style="list-style-type: none"> » The footprint occupied by the solar energy facility and associated infrastructure.

Mitigation: Target/Objective	» To minimise the loss of land taken up by the PV facility and associated infrastructure and to enable farming activities to continue where possible, specifically grazing.
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Mitigation: Action/control	Responsibility	Timeframe
Minimise the footprint of the PV facility and the associated infrastructure as far as possible.	Contractor and Bluewave Capital SA (Pty) Ltd and EPC	Pre-construction
Rehabilitate disturbed areas on completion of the construction phase. Details of the rehabilitation programme are in Appendix E.	Contractors and EPC	Construction

Performance Indicator	» Footprint of PV facility included in the Construction Phase EMP. » Meeting/s held with farmers during construction phase.
Monitoring	» ECO must monitor indicators listed above to ensure that they have been met for the construction phase.

OBJECTIVE: To avoid and or minimise the potential impacts of safety, noise and dust and damage to roads caused by construction vehicles during the construction phase

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.

Project Component/s	» Construction and establishment activities associated with the establishment of the PV facility, including infrastructure etc.
Potential Impact	» Heavy vehicles can generate noise and dust impacts. Movement of heavy vehicles can also damage roads.
Activities/Risk Sources	» The movement of heavy vehicles and their activities on the site can result in noise and dust impacts and damage roads.
Mitigation: Target/Objective	» To avoid and or minimise the potential noise and dust impacts associated with heavy vehicles, and minimise damage to roads.

Mitigation: Action/Control	Responsibility	Timeframe
Implement appropriate dust suppression measures for heavy vehicles and ensure that vehicles used to transport building materials are fitted with tarpaulins or covers.	Contractors and EPC	Duration of Construction

Mitigation: Action/Control	Responsibility	Timeframe
Ensure that all vehicles are road-worthy; drivers are qualified and are made aware of the potential noise, dust and safety issues.	Contractors and EPC	Duration of Construction
Ensure that drivers adhere to speed limits. Vehicles should be fitted with recorders to record when vehicles exceed the speed limit.	Contractors and EPC	Duration of Construction
Ensure that damage to roads is repaired before completion of construction phase.	Contractors and EPC	Duration of Construction

Performance Indicator	<ul style="list-style-type: none"> » Dust suppression measures implemented for all areas that require such measures during the construction phase commences. » Drivers made aware of the potential safety issues and enforcement of strict speed limits when they are employed. » Road worthy certificates in place for all heavy vehicles at outset of construction phase and up-dated on a monthly basis.
Monitoring	<ul style="list-style-type: none"> » Bluewave Capital SA (Pty) Ltd and/or appointed ECO must monitor indicators listed above to ensure that they have been met for the construction phase.

OBJECTIVE: 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 to the smallest area possible.

Project Component/s	All constructional activities that disturb the soil below surface, such as levelling, excavations etc.
Potential Impact	Lack of topsoil, resulting in significant decrease in soil fertility.
Activity/Risk Source	All constructional activities that disturb the soil below surface, such as levelling, excavations etc.
Mitigation: Target/Objective	Ensure effective topsoil covering on all disturbed areas.

Mitigation: Action/Control	Responsibility	Timeframe
If an activity will mechanically disturb below surface in any way, then the upper 10-30 cm of topsoil (depending on the specific topsoil depth at the site of disturbance) should first be stripped from the entire disturbed surface and stockpiled for re-spreading during rehabilitation.	Construction managers / Environmental manager	Duration of the construction phase

Mitigation: Action/Control	Responsibility	Timeframe
Topsoil stockpiles must be conserved against losses through erosion by establishing vegetation cover on them.	Construction managers / Environmental manager	Duration of the construction phase
Dispose of all subsurface spoils from excavations where they will not impact on agricultural land (for example on road surfaces) or where they can be effectively covered with topsoil.	Construction managers / Environmental manager	Duration of the construction phase
The stockpiled topsoil must be evenly spread over the entire disturbed surface.	Construction managers / Environmental manager	During rehabilitation after construction / operation.

Performance Indicator	That no disturbed areas are left without an effective covering of topsoil, and potential for re-vegetation, after rehabilitation.
Monitoring	Establish an effective record keeping system for each area where soil is disturbed for constructional purposes. These records should be included in environmental performance reports, and should include all the records below.

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

There are two vegetation types present within the broader site, Kimberly Thornveld and Western Free State Clay Grassland. Within the vicinity of the proposed development area, only Kimberly Thornveld is present. The open plains where the development area itself is located is characterised by occasional scattered trees of *Searsia lancea* and *Acacia tortillis* with a grassy ground layer dominated by *Themeda triandra*, *Eragrostis lehmanniana*, *Eragrostis superba*, *Aristida canescens* and *Tragus koelerioides*. Low shrubs are also relatively common and dominated by *Lycium cinereum*, *Chrysocoma ciliata*, *Hertia pallens* and *Selago saxatilis*. The open plains habitat is relatively homogenous and apart from some variation in the density of trees, there is little variation in cover or composition across the study area within this habitat type. No listed species were observed during the site visit in this habitat, but it was dry and any such species present may have been dormant.

Project Component/s	» All activities which require or result in the clearing of or impact to vegetation – such as site clearing, operation of heavy machinery, road construction etc
Potential Impact	<ul style="list-style-type: none"> » Loss of intact vegetation » Loss of individuals of listed plant species » Erosion » Alien plant invasion
Activity/Risk Source	» Construction activities, especially for roads, PV arrays, substations and other hard infrastructure. .
Mitigation: Target/Objective	<ul style="list-style-type: none"> » Minimum disturbance footprint at site » No loss of individuals of protected plant species » No alien plant invasion » Minimal soil erosion » Rehabilitation of disturbed areas

Mitigation: Action/Control	Responsibility	Timeframe
Demarcate important or sensitive areas as no-go areas.	Contractor/ECO	Construction
Ensure that rehabilitation plan is followed so that bare areas are not exposed for prolonged periods with likely erosion impacts	Contractor/ECO	Construction
Monitor the site for erosion problems and identify areas where additional intervention such as additional revegetation or erosion control such as silt traps may be necessary	Contractor/ECO	Construction
Monitor disturbed areas for the presence and establishment of alien species such as <i>Opuntia</i> . » Alien species present should be cleared on a regular basis	Contractor/ECO	Construction

Performance Indicator	<ul style="list-style-type: none"> » Protected plant species are translocated to safety prior to construction. » No damage and siltation of local drainage systems » No damage and impingement on sensitive ecosystems adjacent to the site such as wetlands » Site is clear of alien species at the end of construction » An acceptable cover of perennial grass has been established across the majority of cleared and disturbed areas at the end of the construction period
Monitoring	<ul style="list-style-type: none"> » Monitor for erosion problems on a monthly basis during construction » Monitor for alien species presence at least once every 6 months during construction » Evaluate and record progress of rehabilitation and the

	establishment of an effective perennial plant cover within disturbed parts of the site » Keep a log of all incidents where the demarcated construction areas were breached and the remedial actions taken to rectify any damage done.
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OBJECTIVE: Search and Rescue of All Translocatable Indigenous Plants

Prior to any earthworks (including road construction) within areas of natural vegetation, a plant Search and Rescue program should be developed and implemented. The section below provides a guideline for the Search & Rescue Plan on site and will need to be supplemented with the relevant methodology depending on the final placement of infrastructure.

Project Component/s	» Any infrastructure or activity that will result in disturbance to natural areas.
Potential Impact	» Substantially increased loss of natural vegetation at construction phase and waste of on-site plant resources, and lack of locally sourced material for rehabilitation of disturbed areas.
Activities/Risk Sources	» Construction related loss and damage to remaining natural vegetation via heavy machinery, etc.
Mitigation: Target/Objective	» Rescue, maintenance and subsequent replanting of at least 40% of the natural vegetation in all development footprints within any areas of natural vegetation on site

Mitigation: Action/Control	Responsibility	Timeframe
Search and Rescue (S&R) of certain translocatable, selected succulents, shrubs and bulbs occurring in long term & permanent, hard surface development footprints (i.e. all buildings, new roads and tracks, laydown areas, and panel positions) should take place. All such development footprints must be surveyed and pegged out as soon as possible, and then a local horticulturist with Search and Rescue experience should be appointed to undertake the S&R. All rescued species should be bagged (and cuttings taken where appropriate) and kept in the horticulturist's or a designated on-site nursery, and should be returned to site once all construction is completed and rehabilitation of disturbed areas is required. Replanting should only occur in spring or early summer (November to November), once the first rains have fallen, in order to facilitate	ECO Contractor and EPC	Prior to construction

Mitigation: Action/Control	Responsibility	Timeframe
establishment.		
Plants that can be considered for rescue are all bulbs and succulents, and certain shrubs.	ECO Contractor and EPC	Prior to construction

Performance Indicator	<ul style="list-style-type: none"> » Horticulturist to submit list of target species to botanist for approval. » Rescue of material. » Replanting in rehabilitation areas to cover 40% of these areas within 3 months of replanting.
Monitoring	<ul style="list-style-type: none"> » ECO to monitor Search and Rescue. » Horticulturist to liaise with botanist. » Botanist to review rehabilitation success after 3 months of replanting of rehabilitation areas.

OBJECTIVE: Minimise the establishment and spread of alien invasive plants (Invasive Plant Management Plan) and manage indigenous invasive plants

On-going alien and invasive plant monitoring and removal should be undertaken on all areas of natural vegetation within the project lease area on an annual basis. The section below provides a guideline for the Invasive Plant Management Plan and should be implemented together with consideration of the principles contained in the Department of Water Affairs: Working for Water Programme (refer to Appendix B).

Project Component/s	» Any infrastructure or activity that will result in disturbance to natural areas.
Potential Impact	» Invasion of natural vegetation surrounding the site by declared weeds or invasive alien species.
Activities/Risk Sources	» Construction,
Mitigation: Target/Objective	» There is a target of no alien plants within the project control area during the construction and operation phases, and no additional thickening of indigenous invasive shrubs.

Mitigation: Action/Control	Responsibility	Timeframe
Avoid creating conditions in which alien plants may become established: <ul style="list-style-type: none"> » Keep disturbance of indigenous vegetation to a minimum. » Rehabilitate disturbed areas as quickly as possible. » Do not import soil from areas with alien plants. 	Contractor and EPC	Construction and operation

Mitigation: Action/Control	Responsibility	Timeframe
» Remove all alien plants from areas adjacent to or on frequently traversed access routes to prevent dispersal of regenerative material onto site		
Establish an on-going monitoring programme to detect and quantify any alien species that may become established and identify the problem species (as per Conservation of Agricultural Resources Act and Biodiversity Act).	Contractor and EPC	Construction and operation
Immediately control any alien plants that become established using registered control methods.	Contractor and EPC	Construction
DWA approved methodology should be employed for all invasive clearing operations	Contractor and EPC	Construction

Performance Indicator	» For each invasive or alien species: number of plants and aerial cover of plants within project area and immediate surroundings is significantly reduced and alien species are absent from site.
Monitoring	<ul style="list-style-type: none"> » On-going monitoring of area by ECO during construction. » Annual audit of project area and immediate surroundings by qualified botanist. » If any alien invasive species are detected then the distribution of these should be mapped (GPS co-ordinates of plants or concentrations of plants), number of individuals (whole site or per unit area), age and/or size classes of plants and aerial cover of plants. » The results should be interpreted in terms of the risk posed to sensitive habitats within and surrounding the project area and used in optimising the control programme. » The environmental manager should be responsible for driving this process. » Reporting frequency depends on legal compliance framework.

OBJECTIVE: Limit direct faunal impacts

Increased levels of noise, pollution, disturbance and human presence will be detrimental to fauna. Sensitive and shy fauna would move away from the area during the construction phase as a result of the noise and human activities present, while some slow-moving species would not be able to avoid the construction activities and might be killed. Some mammals or reptiles would be vulnerable to illegal collection or poaching during the construction phase as a result of the large number of construction personnel that are likely to be present.

Mammals:

The potential diversity of mammals at the Les Marais/Buitenfontein site is relatively high with as many as 51 terrestrial mammals and 8 bats present. Within the development area at least, the diversity of habitats is low and consequently the number of mammals that would be likely to be affected by the development would be considerably lower. Only species associated with open habitats would be likely to be resident or utilising the development area on a regular basis. Species observed or likely to be present include Aardvark, Scrub Hare, South African Ground Squirrel, Cape Porcupine and African Mole Rat.

Listed mammals which may occur in the area include the White-tailed Mouse *Mystromys albicaudatus* (Endangered), Brown Hyaena *Hyaena brunnea* (Near Threatened), Black-footed Cat *Felis nigripes* (Vulnerable), South African hedgehog *Atelerix frontalis* (SA RDB NT) and Ground Pangolin *Smutsia temminckii* (VU). The cover and substrate at the site is not likely to be favourable for the South African Hedgehog or the Ground Pangolin, while the Brown Hyaena is not likely to be common in the area due to persecution on farmland. The remaining two species may be present at the site, but both are widespread and the development of the site would not amount to a significant amount of habitat loss for these species, especially in this area where the landscape is still predominantly intact.

Reptiles

The reptile diversity in the area is relatively high with as many as 41 reptiles present. However, no listed species are known from the area and the most important habitat at the site for reptiles is likely to be the rocky ridge which is the only habitat in the area which offers significant cover. Species associated with open habitats are likely to predominate within the development area. The impact on reptiles is likely to be local in nature and not of high significance. Given the relatively low structural diversity within the development area, the panels and supports will increase the structural complexity of the development area, which is likely to alter the local reptile composition. Species which can utilise the vertical structure such as geckos and agamas are likely to increase, while species which rely on ground cover may decline as a result of vegetation management within the facility.

Amphibians

As many as 14 amphibians are known from the area, the majority of which are widespread relatively common species. There are no narrow endemic species known from the area. The only listed species known from the area is the Giant Bullfrog *Pyxicephalus adspersus* which is listed as Near Threatened. There are no pans in close proximity to the development area that would be used by this species and it is unlikely that the site is an important area for the Giant Bullfrog. Given the arid nature of the site and the lack of mesic habitats within the

development area, it is not likely to an important area for amphibians in general and the impact of the development on amphibians is therefore likely to be low.

Project Component/s	» Operation of heavy machinery on site, construction activities and human presence
Potential Impact	» Loss of individuals of affected species due to operation of construction machinery as well as poaching and hunting risk from personnel.
Activity/Risk Source	» Habitat transformation & earth-moving during construction; presence of construction and operation personnel.
Mitigation: Target/Objective	» Low faunal impact, during construction and operation

Mitigation: Action/Control	Responsibility	Timeframe
Environmental induction for all staff » All staff at the site should undergo regular environmental induction training	Management/ ECO	Construction & Operation
ECO to monitor and enforce ban on hunting, collecting etc of all plants and animals or their products. » No staff to be allowed to leave the construction area » Site access should be controlled and the appropriate health and safety boards displayed.	ECO	Construction
Speed limits to apply to all construction vehicles to reduce likelihood of collisions with fauna. » 20-30km/h is the recommended maximum for all vehicles at the site	ECO	Construction
Dust suppression during construction. » Regular dust suppression should be applied within the development area as well as along any access roads as required.	ECO	Construction

Performance Indicator	» Low mortality of fauna due to construction machinery and activities » No poaching etc of fauna by construction personnel during construction » Removal to safety of fauna encountered during construction
Monitoring	» Monitoring for compliance during the construction phase

OBJECTIVE: Minimise soil degradation and erosion (Erosion management Plan)

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 in areas that are underlain by fine grained soil which can be mobilised when disturbed, even on relatively low slope gradients (accelerated erosion).
- » Degradation of the natural soil profile due to excavation, removal of topsoil, stockpiling, wetting, compaction, pollution and other construction activities may affect soil forming processes and associated agricultural potential.

Management of erosion will be required during the construction phase of the facility. An erosion management plan is required to ensure compliance with applicable regulations and to prevent increased soil erosion and sedimentation of the downstream environment. The section below provides a guideline for the management of erosion on site and will need to be supplemented with the principles for erosion management contained in the Erosion Management plan included in Appendix C.

Project Component/s	<ul style="list-style-type: none"> » PV arrays and foundations to support them. » Substation. » Access roads. » Underground cabling. » Storage and maintenance facilities and foundations to support them. » Overhead power line and substation linking the facility to the electricity grid.
Potential Impact	<ul style="list-style-type: none"> » Soil degradation including erosion, dust and siltation. » Reduction in agricultural potential.
Activities/Risk Sources	<ul style="list-style-type: none"> » Earthworks & activity on site. » Rainfall and concentrated discharge causing water erosion of disturbed areas. » Wind - erosion of disturbed areas.
Mitigation: Target/Objective	<ul style="list-style-type: none"> » Minimise soil degradation (removal, excavation, mixing, wetting, compaction, pollution, etc.). » Minimise erosion. » Minimise sediment transport downstream (siltation). » Minimise dust pollution.

Mitigation: Action/Control	Responsibility	Timeframe
Identify areas of high erosion risk (drainage	ECO/ and EPC	At design

Mitigation: Action/Control	Responsibility	Timeframe
lines/watercourses, existing problem areas). Only special works to be undertaken in these areas to be authorised by ECO.		stage.
Identify construction areas for general construction work and restrict construction activity to these areas.	ECO/Contractor and EPC	At design stage and during construction
Prevent unnecessary destructive activity within construction areas (prevent over-excavations and double handling)	ECO/Contractor and EPC	During construction
Access roads to be carefully planned and constructed to minimise the impacted area and prevent unnecessary degradation of soil.	ECO/Contractor and EPC	At design stage and during construction
Dust control on site through implementation of appropriate measures (e.g. wetting or covering of cleared areas).	Contractor and EPC	Daily during construction
Minimise removal of vegetation which aids soil stability.	ECO/Contractor and EPC	Continuously during construction
Rehabilitate disturbance areas as soon as construction in an area is completed and the area is vacated.	Contractor and EPC	Continuously during and after construction
Soil conservation - stockpile topsoil for re-use in rehabilitation phase. Protect stockpile from erosion. Topsoil should be stockpiled below 2 m height and for as short a period as possible to ensure survival of the soil seed bank and other soil-borne organisms.	Contractor and EPC	Continuously during construction
Erosion control measures- run-off control and attenuation on slopes (sand bags, logs), silt fences, stormwater channels and catch-pits, shade nets, soil binding, geofabrics, hydroseeding or mulching over cleared areas.	Contractor/ECO and EPC	Erection: Before construction Maintenance: Duration of contract
Where access roads cross natural drainage lines, culverts must be designed to allow free flow. Regular maintenance must be carried out.	ECO/Contractor and EPC	Before construction and maintenance over duration of contract
Control depth of excavations and stability of cut faces/sidewalls.	ECO/Contractor and EPC	Before construction and maintenance

Mitigation: Action/Control	Responsibility	Timeframe
		over duration of contract
Identify areas of high erosion risk (drainage lines/watercourses, existing problem areas). Only special works to be undertaken in these areas to be authorised by ECO.	ECO and EPC	At design stage.

Performance Indicator	<ul style="list-style-type: none"> » Only authorised activity outside construction areas. » No activity in no-go areas. » Acceptable level of activity within construction areas, as determined by ECO. » Acceptable level of soil erosion around site, as determined by ECO. » Acceptable level of sedimentation along drainage lines, as determined by ECO. » Acceptable level of soil degradation, as determined by ECO. » Acceptable state of excavations, as determined by ECO.
Monitoring	<ul style="list-style-type: none"> » Monthly inspections of the site by the ECO. » Monthly inspections of sediment control devices by the ECO. » Monthly inspections of surroundings, including drainage lines by the ECO. » Immediate reporting of ineffective sediment control systems by the ECO. » An incident reporting system will record non-conformances.

OBJECTIVE: Minimising the impact on archaeological sites

The main cause of impacts to archaeological sites is physical disturbance of the material itself and its context. The heritage and scientific potential of an archaeological site is highly dependent on its geological and spatial context. This means that even though, for example a deep excavation may expose archaeological artefacts, the artefacts are relatively meaningless once removed from the area in which they were found. Large-scale excavations for foundations will damage archaeological sites, as will road construction activities.

The impacts to heritage resources by the proposed development are considered to be low. The only archaeological remains consist of highly weathered Middle Stone Age (MSA) "scatters" (MSA 1 - 5) located on the northern periphery of the development footprint. This occurrence is of low significance as they consist of ex situ material with no stratigraphy and no further mitigation is needed for this aspect. Apart from the Stone Age component No buildings exist on the site and no cultural landscape elements were noted.

Large portions of the broader study area of the study area are underlain by Permian basinal mudrocks of the Tierberg Formation (Ecca Group) and Late Caenozoic calcretes and pan sediments. However, the proposed solar facility development site is underlain by Early Jurassic intrusive igneous rocks of the Karoo Dolerite Suite that are entirely unfossiliferous.

Project Component/s	<ul style="list-style-type: none"> » Solar Array » Roads » Power lines » Construction equipment camps
Potential Impact	<ul style="list-style-type: none"> » Destruction of archaeological sites » Impacts on palaeontology
Activity/Risk Source	<ul style="list-style-type: none"> » Solar array foundations, power lines and roads
Mitigation: Target/Objective	<ul style="list-style-type: none"> » Minimise impacts on archaeological sites

Mitigation: Action/control	Responsibility	Timeframe
Should archaeological sites or graves be exposed during construction work, work in the area must be stopped and the find must immediately be reported to a suitably qualified heritage practitioner such that an investigation and evaluation of the finds can be made.	Contractor, ECO and EPC	Duration of construction

Performance Indicator	<ul style="list-style-type: none"> » No destruction of archaeological sites » No impacts on graves
Monitoring	<ul style="list-style-type: none"> » Monitoring during construction to ensure no sites are unearthed and impacted on

OBJECTIVE: The mitigation and possible negation of the additional visual impacts associated with the construction of the solar energy facility.

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. The proposed project is a semi-industrial land use and it would be located in an agricultural area but directly adjacent to electrical infrastructure, i.e. a substation and radiating transmission lines. It would be visible to users of the R64 road, and several farmsteads.

The terrain contributes in some measure to shielding this development from some farmsteads and the road users. The farmsteads are shielded to varying degrees by shade trees; the road is busy.

Project Component/s	<ul style="list-style-type: none"> » Construction site, various buildings, a generator, a substation, a power line, a fence and internal access roads. <p>(Function of the project, Height of the proposed development above ground, Choice of technology and materials, Project association with similar developments locally, context , Numbers and degree of sensitive receptors, Shielding and exposure)</p>
Potential Impact	<ul style="list-style-type: none"> » The numbers of receptors would increase » The project would be visually incompatible with its surrounds » The visual nature of the landscape would be altered to a negative and permanent degree
Activity/Risk Source	<ul style="list-style-type: none"> » Location of the installation » Association of the installation with installations of a similar function; using natural features as shielding where practicable » Incorporating measures during the design stage to ensure sustainability, and reduction in the impacts on natural processes
Mitigation: Target/Objective	<ul style="list-style-type: none"> » Description of the target; include quantitative measures and/or dates of completion » Ensure that at the design stage functions and processes with low scoring impacts are preferred

Mitigation: Action/Control	Responsibility	Timeframe
Adopt responsible construction practices aimed at containing the construction activities to specifically demarcated areas thereby limiting the removal of natural vegetation to the minimum.	Bluewave Capital SA (Pty) Ltd/ contractors and EPC	Construction
Limit access to the construction site to existing access roads.	Bluewave Capital SA (Pty) Ltd/ contractors and EPC	Construction / operation
Rehabilitate all disturbed areas to acceptable visual standards as soon as possible after construction is complete in an area.	Bluewave Capital SA (Pty) Ltd/ contractors and EPC	Construction / operation
Maintain the general appearance of the facility in an aesthetically pleasing way.	Bluewave Capital SA (Pty) Ltd/ operator and EPC	Operation

Performance Indicator	<ul style="list-style-type: none"> » The key indicators would be the definition of the impacts predicted and the qualities of the receiving environment. Reference to the VIA indicates the limited nature of the anticipated impacts and in addition, the ability of the landscape to absorb the development.
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Monitoring	<ul style="list-style-type: none"> » Baseline Monitoring: all plans to be reviewed timeously by bodies responsible for aesthetics. » Construction Phase Monitoring: an Environmental Control Officer to monitor the specified visual management actions.
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OBJECTIVE: Appropriate handling and management of waste

The main wastes expected to be generated by the construction of the solar energy facility will include general construction waste, hazardous waste (i.e. fuel), and liquid waste (including grey water and sewage). The volumes of waste expected to be generated will not trigger the requirement for a waste management license. Wastes must however be managed effectively in order to ensure minimal impacts on the environment.

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. A guideline for integrated management of construction waste is included as Appendix D of this EMP.

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

Mitigation: Action/Control	Responsibility	Timeframe
Construction method and materials should be carefully	Contractor and	Duration of

Mitigation: Action/Control	Responsibility	Timeframe
considered in view of waste reduction, re-use, and recycling opportunities.	EPC	contract
Construction contractors must provide specific detailed waste management plans to deal with all waste streams.	Contractor and EPC	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 as required. 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 and EPC	Duration of contract
Where practically 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 and EPC	Duration of contract
Disposal of waste must be in accordance with relevant legislative requirements, including the use of licensed contractors.	Contractor and EPC	Duration of contract
Uncontaminated waste will be removed at least weekly for disposal; other wastes will be removed for recycling/ disposal at an appropriate frequency.	Contractor and EPC	Duration of contract
Disposal of waste will be in accordance with relevant legislative requirements, including the use of licensed contractors.	Contractor and EPC	Duration of contract
Hydrocarbon waste must be contained and stored in sealed containers within an appropriately bunded area.	Contractor and EPC	Duration of contract
Waste must be kept to a minimum and must be transported by approved waste transporters to sites designated for their disposal.	Contractor and EPC	Duration of contract
Documentation (waste manifest) must be maintained detailing the quantity, nature, and fate of any regulated waste. Waste disposal records must be available for review at any time.	Contractor and EPC	Duration of contract
Regularly serviced chemical toilets facilities will be used to ensure appropriate control of sewage.	Contractor and EPC	Duration of contract
Upon the completion of construction, the area must be cleared of potentially polluting materials.	Contractor and EPC	Completion of construction
Dispose of all solid waste collected at an appropriately registered waste disposal site. Waste disposal shall be in accordance with all relevant legislation and under no	Contractor and EPC	Duration of construction

Mitigation: Action/Control	Responsibility	Timeframe
circumstances may waste be burnt on site.		
Where a registered waste site is not available close to the construction site, provide a method statement with regard to waste management.	Contractor and EPC	Duration of construction

Performance Indicator	<ul style="list-style-type: none"> » No complaints received regarding waste on site or indiscriminate dumping. » Internal site audits ensuring that waste segregation, recycling and reuse is occurring appropriately. » Provision of all appropriate waste manifests for all waste streams.
Monitoring	<ul style="list-style-type: none"> » Observation and supervision of waste management practices throughout construction phase. » Waste collection will be monitored on a regular basis. » Waste documentation completed. » A complaints register will 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 will be used to record non-conformances to the EMP.

OBJECTIVE: Appropriate handling and storage of chemicals, 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.

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

	<p>persons.</p> <p>» Vehicles and equipment must be serviced regularly and maintained in a good running condition. Vehicles must be fitted with spill skills. Storage of contaminants must be limited to low quantities and done under strict industry standards. There must be strict control over the safe usage of vehicles and equipment to minimise vehicle accidents and damage to vehicles by rocks and boulders which may cause spillages. Contingency plans must be in place to deal with spillages. The solar arrays should only be cleaned with water and soaps and detergents should not be allowed.</p>
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Mitigation: Action/Control	Responsibility	Timeframe
Develop and implement an emergency preparedness plan during the construction phase.	Contractor and EPC	Pre-construction and implement for duration of Contract
Spill kits must be made available on-site for the clean-up of spills and leaks of contaminants.	Contractor and EPC	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 and EPC	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 and EPC	Duration of contract
Spilled cement must be cleaned up as soon as possible and disposed of at a suitably licensed waste disposal site.	Contractor and EPC	Duration of contract
Any contaminated/polluted soil removed from the site must be disposed of at a licensed hazardous waste disposal facility.	Contractor and EPC	Duration of contract
Routine servicing and maintenance of vehicles must not take place on-site (except for emergencies). If repairs of vehicles must take place, an appropriate drip tray must be used to contain any fuel or oils.	Contractor and EPC	Duration of contract
All stored fuels to be maintained within a bund and on a sealed surface. The bunded area must be provided with a tap-off system through which spillages and leakages that might occur will be removed without any spillage outside the bunded area.	Contractor and EPC	Duration of contract

Mitigation: Action/Control	Responsibility	Timeframe
Fuel storage areas must be inspected regularly to ensure bund stability, integrity, and function.	Contractor and EPC	Duration of contract
Construction machinery must be stored in an appropriately sealed area.	Contractor and EPC	Duration of contract
Oily water from bunds at the substations must be removed from site by licensed contractors.	Contractor and EPC	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 and EPC	Duration of contract
Any storage and disposal permits/approvals which may be required must be obtained, and the conditions attached to such permits and approvals will be compiled with.	Contractor and EPC	Duration of contract
Transport of all hazardous substances must be in accordance with the relevant legislation and regulations	Contractor and EPC	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 and EPC	Duration of contract
Upon the completion of construction, the area must be cleared of potentially polluting materials.	Contractor and EPC	Completion of construction

Performance Indicator	<ul style="list-style-type: none"> » No chemical spills outside of designated storage areas. » No unattended water or soil contamination by spills. » No complaints received regarding waste on site or indiscriminate dumping.
Monitoring	<ul style="list-style-type: none"> » Implement an effective monitoring system to detect any leakage or spillage of all hazardous substances. » Observation and supervision of chemical storage and handling practices and vehicle maintenance throughout construction phase. » A complaints register must be maintained, in which any complaints from the community will be logged. » An incident reporting system will be used to record non-conformances to the EMP.

OBJECTIVE: To avoid and or minimise the potential risk of increased veld fires during the construction phase

The increased presence of people on the site could increase the risk of veld fires, particularly in the dry season.

Project Component/s	» Construction and establishment activities associated with the establishment of PV facility, including infrastructure etc.
Potential Impact	» Veld fires can pose a personal safety risk to local farmers and communities, and their homes, crops, livestock and farm infrastructure, such as gates and fences.
Activities/Risk Sources	» The presence of construction workers and their activities on the site can increase the risk of veld fires.
Mitigation: Target/Objective	» To avoid and or minimise the potential risk of veld fires on local communities and their livelihoods.

Mitigation: Action/Control	Responsibility	Timeframe
Ensure that open fires on the site for cooking or heating are not allowed except in designated areas.	Contractors	Duration of construction
Provide adequate fire fighting equipment onsite.	Contractors	Duration of construction
Provide fire-fighting training to selected construction staff.	Contractors	Duration of construction
Compensate farmers / community members at full market related replacement cost for any losses, such as livestock, damage to infrastructure etc.	Contractors	Duration of construction
Join local Fire Protection Agency (if established).	Bluewave Capital SA (Pty) Ltd	Pre-construction

Performance Indicator	<ul style="list-style-type: none"> » Designated areas for fires identified on site at the outset of the construction phase. » Fire fighting equipment and training provided before the construction phase commences. » Compensation claims settled within 1 month of claim
Monitoring	» Bluewave Capital SA (Pty) Ltd and or appointed ECO must monitor indicators listed above to ensure that they have been met for the construction phase.

6.3 Detailing Method Statements

OBJECTIVE: Ensure all construction activities are undertaken with the appropriate level of environmental awareness to minimise environmental risk

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 practically be mitigated and managed for the duration of the contract, and how specifications within this EMP 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, setting out the plant, materials, labour and method the Contractor proposes using to conduct an activity, in such detail that the Site Manager 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:

- » 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.

Very specific areas to be addressed in method statements before, during and post construction include:

- » Site Establishment plan (which explains all activities from induction training to offloading, construction sequence for site establishment and the different amenities and to be established etc. Including a site camp plan indicating all of these).
- » Preparation of the site (i.e. clearing vegetation, compacting soils and removing existing infrastructure and waste).
- » Soil management/stockpiling and erosion control.
- » Excavations and backfilling procedure and processes.
- » Stipulate norms and standards for water supply and usage (i.e.: comply strictly to licence and legislation requirements and restrictions as applicable).
- » Stipulate the storm water management procedures recommended in the storm water management plan.

- » Ablution facilities (placement, maintenance, management and servicing).
- » Solid Waste Management:
 - * Description of the waste storage facilities (on site and accumulative).
 - * Placement of waste stored (on site and accumulative).
 - * Management and collection of waste process.
 - * Recycle, re-use and removal process and procedure.
- » Liquid waste management:
 - * The design, establish, maintain and operate suitable procedures for pollution control facilities necessary to prevent discharge of water containing polluting matter or visible suspended materials into rivers, streams or existing drainage systems.
 - * Stipulate grey water (i.e. water from basins, showers, baths, kitchen sinks etc.) that needs to be disposed of, link into an existing facilities where possible. Where no facilities are available, grey water runoff must be controlled to ensure there is no seepage into wetlands or natural watercourses.
- » Dust and noise pollution:
 - * Describe necessary measures to ensure that noise from construction activities is maintained within lawfully acceptable levels (construction activities generating output levels of 85 dB(A) near human settlement, are to be confined to working hours (06h00 - 18h00) Mondays to Fridays).
 - * Procedure to control dust at all times on the site, access roads, borrow pits and spoil sites (dust control shall be sufficient so as not to have significant impacts in terms of the biophysical and social environments). These impacts include visual pollution, decreased safety due to reduced visibility, negative effects on human health and the ecology due to dust particle accumulation.
- » 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).
 - * List of all potentially hazardous substances to be used.
 - * Appropriate handling, storage and disposal procedures.
 - * Prevention plan of accidental contamination of soil at storage and handling areas.
 - * All storage areas, (i.e.: for harmful substances appropriately bunded with a suitable collection point for accidental spills must be implemented and drip trays underneath dispensing mechanisms including leaking engines/machinery).
- » 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).
- » Rehabilitation and re-vegetation process.
- » Traffic management.
- » Incident and accident reporting protocol.
- » General administration (and stipulating that all documentation and licences must be on site at all times).
- » Designate access road and the protocol on while roads are in use.
- » Requirements of gate control protocols.

Where relevant, these Method Statements must be prepared and submitted to Bluewave Capital SA (Pty) Ltd (Pty) Ltd Construction Manager (or may be delegated to the ECO) /Project Manager and the ECO. The Contractor may not commence the activity covered by the Method Statement until it has been approved by the Bluewave Capital SA (Pty) Ltd (Pty) Ltd Construction Manager (or may be delegated to the ECO) /Project Manager, except in the case of emergency activities and then only with the consent of the Site Manager. Approval 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 should monitor the construction activities to ensure that these are undertaken in accordance with the approved Method Statement.

6.4 Awareness and Competence: Construction Phase of the Solar Energy Facility

OBJECTIVE: To ensure all construction personnel have the appropriate level of environmental awareness and competence to ensure continued environmental due diligence and on-going minimisation of environmental harm

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 EMP. 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 EMP is readily available on-site, and that all site staff are aware of the location and have access to the document.
- » Employees will be familiar with the requirements of the EMP and the environmental specifications as they apply to the construction of the facility.
- » Employees must undergo training for the operation and maintenance activities associated with a PV plant and have a basic knowledge of the potential environmental impacts that could occur and how they can be minimised and mitigated.
- » Ensuring that, prior to commencing any site works, all employees and sub-contractors have attended an Environmental Awareness Training course.
- » 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 environmental matters, which are deemed necessary by the ECO.
- » Ensuring that employee information posters, outlining the environmental "do's" and "don'ts" (as per the environmental awareness training course) are erected at prominent locations throughout the site.
- » 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.
- » Records must be kept of those that have completed the relevant training.
- » Training should be done either in a written or verbal format but must be appropriate for the receiving audience.
- » Refresher sessions must be held to ensure the contractor staff are aware of their environmental obligations as practically possible.

Therefore, prior to the commencement of construction activities on site and before any person commences with work on site thereafter, adequate environmental awareness and responsibility are to be appropriately presented to all staff present onsite, clearly describing their obligations towards environmental controls and methodologies in terms of this EMP. This training and awareness will be achieved in the following ways:

6.4.1 Environmental Awareness Training

Environmental Awareness Training must take the form of an on-site talk and demonstration by the ECO 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 on site.

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 site.

This induction training should include discussing the developer's environmental policy and values, the function of the EMP 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 repercussions of not complying with these. 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 SHE Officer on site.

6.4.3 Toolbox Talks

Toolbox talks should be held on a scheduled and regular basis (at least twice a month) 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 the prevention of reoccurrence thereof. Records of attendance and the awareness talk subject must be kept on file.

6.5 Monitoring Programme: Construction Phase

OBJECTIVE: To monitor the performance of the control strategies employed against environmental objectives and standards

A monitoring programme must be in place not only to ensure conformance with the EMP, but also to monitor any environmental issues and impacts which have not been accounted for in the EMP that are, or could result in significant environmental impacts for which corrective action is required. The period and frequency of monitoring will be stipulated by the Environmental Authorisation (once issued). Where this is not clearly dictated, Bluewave Capital SA (Pty) Ltd (Pty) Ltd will determine and stipulate the period and frequency of monitoring

required in consultation with relevant stakeholders and authorities. The Project Manager will ensure that the monitoring is conducted and reported.

The aim of the monitoring and auditing process would be to routinely 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.
- » Determine the effectiveness of the environmental specifications and recommend the requisite changes and updates based on audit outcomes, in order to enhance the efficacy of environmental management on site.
- » Aid communication and feedback to authorities and stakeholders.

The ECO will ensure compliance with the EMP, will conduct monitoring activities, and will report any non-compliance or where corrective action is necessary to the Site Manager and/or any other monitoring body stipulated by the regulating authorities. The ECO must have the appropriate experience and qualifications to undertake the necessary tasks. The following reports will be applicable:

6.5.1 Non-Conformance Reports

All supervisory staff including Foremen, Resident Engineers, and the ECO 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.

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.

6.5.2 Monitoring Reports

A monitoring report will be compiled by the ECO on a monthly basis and 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, 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 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 EMP.

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: 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.

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

Mitigation: Action/Control	Responsibility	Timeframe
All temporary facilities, equipment, and waste materials must be removed from site.	Contractor and EPC	Following execution of the works
All temporary fencing and danger tape must be removed once the construction phase has been completed.	Contractor and EPC	Following completion of construction activities in an

Mitigation: Action/Control	Responsibility	Timeframe
		area
The area that previously housed the construction camp is to be checked for spills of substances such as oil, paint, etc. and these should be cleaned up.	Contractor and EPC	Following completion of construction activities in an area
All hardened surfaces within the construction camp area should be ripped, all imported materials removed, and the area shall be top soiled and re-vegetated.	Contractor and EPC	Following completion of construction activities in an area
Temporary roads must be closed and access across these blocked. Compacted surfaces of temporary roads must be ripped to facilitate their rehabilitation.	Contractor and EPC	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 and EPC	Following completion of construction activities in an area
A rehabilitation plan that specifies the rehabilitation process should be compiled and should be approved by the ECO.	Contractor, Bluewave Capital SA (Pty) Ltd and ECO and EPC	Pre-construction
Disturbed areas must be rehabilitated/re-vegetated with appropriate natural vegetation and/or local seed mix. Re-use of native/indigenous plant species removed from disturbance areas in the rehabilitation phase to be determined by a botanist as applicable.	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.	Bluewave Capital SA (Pty) Ltd in consultation with rehabilitation specialist	Post-rehabilitation
Erosion control measures should be used in sensitive areas such as steep slopes, hills, and drainage lines as necessary.	Bluewave Capital SA (Pty) Ltd in consultation with rehabilitation	Post-rehabilitation

Mitigation: Action/Control	Responsibility	Timeframe
	specialist	
On-going invasive and alien plant monitoring and removal must be undertaken on all areas of natural vegetation on an annual basis.	Bluewave Capital SA (Pty) Ltd in consultation with rehabilitation specialist	Post-rehabilitation

Performance Indicator	<ul style="list-style-type: none"> » All portions of site, including construction equipment camp and working areas, cleared of equipment and temporary facilities. » Topsoil replaced on all areas and stabilised where practicable or required after construction and temporally utilised areas. » Disturbed areas rehabilitated and acceptable plant cover achieved on rehabilitated sites. » Completed site free of erosion and alien invasive plants.
Monitoring	<ul style="list-style-type: none"> » On-going inspection of rehabilitated areas in order to determine effectiveness of rehabilitation measures implemented during the operational lifespan of the facility. » On-going alien plant monitoring and removal should be undertaken on an annual basis.

MANAGEMENT PROGRAMME: OPERATION

CHAPTER 8

Overall Goal: To ensure that the operation of the solar energy facility 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 appropriately managed in respect of environmental aspects and impacts.
- » Enables the solar energy 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 be appointed during operation whose duty it will be to ensure the implementation of the operational EMP.

8.1. Objectives

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

OBJECTIVE: Limit the ecological footprint of the facility

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.

Project component/s	<ul style="list-style-type: none"> » Areas requiring regular maintenance. » Route of the security team. » Areas disturbed during the construction phase and subsequent rehabilitation at its completion. » Areas where the natural microclimate and thus vegetation composition has changed due to structures such as PV panels erected. » Presence and operation of the facility
Potential Impact	<ul style="list-style-type: none"> » Impact on the surrounding landscape due to alien plant

	invasion, erosion or poor management with the facility.
Activity/Risk Source	<ul style="list-style-type: none"> » Alien plants within the facility » Erosion from within the facility » Human presence » Maintenance activities which may lead to negative impacts such as pollution, herbicide drift etc.
Mitigation: Target/Objective	<ul style="list-style-type: none"> » Maintain minimised footprints of disturbance of vegetation/habitats on-site. » Ensure and encourage plant regrowth in non-operational areas of post-construction rehabilitation.

Mitigation: Action/Control	Responsibility	Timeframe
Access Control <ul style="list-style-type: none"> » Acces to the site should be controlled, to the actual facility as well as the surrounding farmland. 	Management	Operation
Vegetation control should be by manual clearing or the use of livestock. <ul style="list-style-type: none"> » Herbicides should not be used. 	Management	Operation
Bi-annual monitoring for alien plant species - with follow up clearing	Management	Operation
Quarterly site inspection for erosion problems - with follow up remedial action where problems are identified	Management	Operation

Performance Indicator	<ul style="list-style-type: none"> » No complaints from the landowner as to trespassing on the farmland » No alien species within the site » No erosion problems within the site or from access roads » Maintenance of a ground cover of perennial grasses and forns that resist erosion.
Monitoring	<ul style="list-style-type: none"> » Records of alien species presence and clearing actions » Records of erosion problems and mitigation actions taken with photographs » Management log detailing the management actions taken to maintain and control the vegetation within the facility.

OBJECTIVE: Minimise soil degradation and erosion (Erosion Management Plan)

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 which is underlain by fine grained soil which can be mobilised when disturbed, even on relatively low slope gradients (accelerated erosion).
- » Uncontrolled run-off relating to construction activity (excessive wetting, uncontrolled discharge, etc.) will also lead to accelerated erosion and possible sedimentation of drainage systems.
- » Degradation of the natural soil profile due to pollution.

Management of erosion will be required during the operation phase of the facility. An erosion management plan is required to ensure compliance with applicable regulations and to prevent increased soil erosion and sedimentation of the downstream environment. The section below provides a guideline for the management of erosion on site and will need to be supplemented with the principles for erosion management contained in the Erosion Management plan included in Appendix C.

Project Component/s	<ul style="list-style-type: none"> » PV panels. » Power line. » Ancillary buildings. » Access roads.
Potential Impact	<ul style="list-style-type: none"> » Soil degradation. » Soil erosion. » Increased water run-off, soil degradation due to water erosion and sediment generation
Activities/Risk Sources	<ul style="list-style-type: none"> » Complete denudation of the soil, poor placement of the site and poor planning of storm water run-off control
Mitigation: Target/Objective	<ul style="list-style-type: none"> »

Mitigation: Action/Control	Responsibility	Timeframe
Maintain erosion control measures implemented during the construction phase (i.e. run-off attenuation on slopes (logs), silt fences, storm water catch-pits, and shade nets).	Bluewave Capital SA (Pty) Ltd and EPC	Operation
Develop and implement an appropriate storm water management plan for the operational phase of the facility	Bluewave Capital SA (Pty) Ltd and EPC	Operation
<ul style="list-style-type: none"> » Ensure rehabilitation of disturbed areas is maintained. » Minimise soil degradation. » Minimise soil erosion and deposition of soil into 	Bluewave Capital SA (Pty) Ltd and EPC	

Mitigation: Action/Control	Responsibility	Timeframe
drainage lines. » Ensure continued stability of embankments/excavations. Prevention and control of water erosion on the site » Care must be taken with the ground cover during and after construction on the site. If it is not possible to retain a good plant cover during construction, technologies should be employed to keep the soil covered by other means, i.e. straw, mulch, erosion control mats, etc., until a healthy plant cover is established again. Care should also be taken to control and contain storm water run-off and not to concentrate its runoff, specifically under the solar arrays. It is also recommended that conservation practices similar to the conservation cultivation practiced in the area are employed with the arrangement of the PV arrays, i.e. in strips of land on the contour of the land, with buffer zones of grass between the development strips and the channelling of run-off water from the development strips into stable grass covered waterways or outlets. The development strips are not to be terraced (=levelled) as the soils are too shallow to allow for terracing. The width and length of the development strips and buffer strips, as well as the measurements and number of outlets are dependent upon the erodibility of the soils present, the slope and rainfall regime, and should be designed with the assistance of an agricultural engineer		

Performance Indicator	» Acceptable level of soil erosion around site, as determined by the site manager. » Acceptable level of increased siltation in drainage lines, as determined by the site manager.
Monitoring	» Inspections of site on a bi-annual basis. » Water management plan » Monitor erosion rates and erosion sites on a weekly basis and after each storm water event.

OBJECTIVE: Minimise dust and air emissions

During the operational phase, limited gaseous or particulate emissions are anticipated from exhaust emissions (i.e. from operational vehicles). Windy conditions and the movement of vehicles on site may lead to dust creation.

Project Component/s	<ul style="list-style-type: none"> » Hard engineered surfaces. » On-site vehicles.
Potential Impact	<ul style="list-style-type: none"> » Dust and particulates from vehicle movement to and on-site. » Release of minor amounts of air pollutants (for example NO₂, CO and SO₂) from vehicles
Activities/Risk Sources	<ul style="list-style-type: none"> » Re-entrainment of deposited dust by vehicle movements. » Wind erosion from unsealed roads and surfaces. » Fuel burning vehicle and construction engines.
Mitigation: Target/Objective	<ul style="list-style-type: none"> » To ensure emissions from all vehicles are minimised, where possible. » To minimise nuisance to the community from dust emissions and to comply with workplace health and safety requirements.

Mitigation: Action/Control	Responsibility	Timeframe
Roads must be maintained to a manner that will ensure that nuisance to the community from dust is not visibly excessive.	Bluewave Capital (Pty) Ltd and EPC SA	Operation
Appropriate dust suppression must be applied to the roads as required to minimise/control airborne dust.	Bluewave Capital (Pty) Ltd and EPC SA	Operation
Speed of vehicles must be restricted, as defined by the Environmental Manager.	Bluewave Capital (Pty) Ltd and EPC SA	Operation
Vehicles and equipment must be maintained in a road-worthy condition at all times.	Bluewave Capital (Pty) Ltd and EPC SA	Operation

Performance Indicator	<ul style="list-style-type: none"> » No complaints from affected residents or community regarding dust or vehicle emissions. » Dust suppression measures implemented for where required. » Drivers made aware of the potential safety issues and enforcement of strict speed limits when they are employed.
Monitoring	<ul style="list-style-type: none"> » Immediate reporting by personnel of any potential or actual issues with nuisance dust or emissions to the Site Manager. » A complaints register must be maintained, in which any complaints from residents/the community will be logged, and thereafter complaints will be investigated and, where

	appropriate, acted upon. » An incident reporting system must be used to record non-conformances to the EMP.
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OBJECTIVE: Ensure the implementation of an appropriate fire management plan during the operation phase

The increased presence of people on the site could increase the risk of veld fires, particularly in the dry season.

Project Component/s	» Operation and maintenance of the solar energy facility and associated infrastructure.
Potential Impact	» Veld fires can pose a personal safety risk to local farmers and communities, and their homes, crops, livestock and farm infrastructure, such as gates and fences. In addition, fire can pose a risk to the solar energy facility infrastructure.
Activities/Risk Sources	» The presence of operation and maintenance personnel and their activities on the site can increase the risk of veld fires.
Mitigation: Target/Objective	» To avoid and or minimise the potential risk of veld fires on local communities and their livelihoods.

Mitigation: Action/Control	Responsibility	Timeframe
Join the local Fire Protection Agency (if established).	Bluewave Capital SA (Pty) Ltd and EPC	Operation
Provide adequate fire fighting equipment on site.	Bluewave Capital SA (Pty) Ltd and EPC	Operation
Provide fire-fighting training to selected operation and maintenance staff.	Bluewave Capital SA (Pty) Ltd and EPC	Operation
Ensure that appropriate communication channels are established to be implemented in the event of a fire.	Bluewave Capital SA (Pty) Ltd and EPC	Operation
Fire breaks should be established where and when required. Cognisance must be taken of the relevant legislation when planning and burning firebreaks (in terms of timing, etc.).	Bluewave Capital SA (Pty) Ltd and EPC	Operation
Upon completion of the construction phase, an emergency evacuation plan must be drawn up to ensure the safety of the staff and surrounding land	Bluewave Capital SA (Pty) Ltd and EPC	Operation

Mitigation: Action/Control	Responsibility	Timeframe
users in the case of an emergency.		
Contact details of emergency services should be prominently displayed on site.	Bluewave Capital SA (Pty) Ltd and EPC	Operation

Performance Indicator	<ul style="list-style-type: none"> » Fire fighting equipment and training provided before the operational phase commences. » Appropriate fire breaks in place and maintained.
Monitoring	<ul style="list-style-type: none"> » Bluewave Capital SA (Pty) Ltd must monitor indicators listed above to ensure that they have been met.

OBJECTIVE: Maximise local employment and business opportunities associated with the operational phase

The facility is expected to be operational for more than 20 years during which time approximately 5 staff members are expected to be required on-site. Therefore, long-term direct job opportunities for locals could exist, although limited. However, in an area with such high unemployment figures, these limited opportunities should still be seen as a positive impact on the quality of life of those benefiting from the employment.

Some local procurement of goods, materials and services could occur which would result in positive economic spin-offs. These opportunities for local service providers to render services to the proposed facility could include maintenance of the guardhouse, gardening at the guardhouse, cleaning services, security services and maintenance or replacement of general equipment

Project Component/s	<ul style="list-style-type: none"> » Day to day operational activities associated with the PV facility, including maintenance etc.
Potential Impact	<ul style="list-style-type: none"> » The opportunities and benefits associated with the creation of local employment and business should be maximised
Activities/Risk Sources	<ul style="list-style-type: none"> » The operational phase of the PV facility will create approximately 5 full time employment opportunities.
Mitigation: Target/Objective	<ul style="list-style-type: none"> » In the medium to long term employ as many locals as possible to fill the full time employment opportunities.

Mitigation: Action/Control	Responsibility	Timeframe
The workforce of 25 permanent staff is likely to be based in Boshof - Les Marais / Buitenfontein . As	Bluewave Capital SA (Pty) Ltd and	during operations

Mitigation: Action/Control	Responsibility	Timeframe
part of the local content and support programs Bluewave Capital SA (Pty) Ltd should commit to implementing a training and skills development and training programme to maximise employment for locals.	EPC	
Identify local members of the community who are suitably qualified or who have the potential to be employed full time.	Bluewave Capital SA (Pty) Ltd and EPC	Prior to commencement of operation

Performance Indicator	<ul style="list-style-type: none"> » 5 year training and skills development programme developed and designed before construction phase completed. » Potential locals identified before construction phase completed.
Monitoring	<ul style="list-style-type: none"> » Bluewave Capital SA (Pty) Ltd must monitor indicators listed above to ensure that they have been met for the operational phase.

OBJECTIVE: Appropriate handling and management of waste including handling hazardous/dangerous substances

The operation of the facility will involve the storage of chemicals and hazardous substances, as well as the generation of limited waste products. The main wastes expected to be generated by the operation activities include general solid waste, and liquid waste.

A guideline for integrated management of waste is included as Appendix D of this EMP.

Project Component/s	<ul style="list-style-type: none"> » Substation. » Operation and maintenance staff. » Workshop.
Potential Impact	<ul style="list-style-type: none"> » Inefficient use of resources resulting in excessive waste generation. » Litter or contamination of the site or water through poor waste management practices. » Contamination of water or soil because of poor materials management.
Activity/Risk Source	<ul style="list-style-type: none"> » Transformers and switchgear for the substations. » Ancillary buildings.
Mitigation: Target/Objective	<ul style="list-style-type: none"> » Comply with waste management legislation. » Minimise production of waste. » Ensure appropriate waste disposal.

	<ul style="list-style-type: none"> » Avoid environmental harm from waste disposal. » Ensure appropriate storage of chemicals and hazardous substances.
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Mitigation: Action/Control	Responsibility	Timeframe
Hazardous substances (such as used/new transformer oils, etc.) must be stored in sealed containers within a clearly demarcated designated area.	Bluewave Capital SA (Pty) Ltd and EPC	Operation
Storage areas for hazardous substances must be appropriately sealed and bunded.	Bluewave Capital SA (Pty) Ltd and EPC	Operation
All structures and/or components replaced during maintenance activities must be appropriately disposed of at an appropriately licensed waste disposal site or sold to a recycling merchant for recycling.	Bluewave Capital SA (Pty) Ltd and EPC	Operation
Care must be taken to ensure that spillage of oils and other hazardous substances are limited during maintenance. Handling of these materials should take place within an appropriately sealed and bunded area. Should any accidental spillage take place, it must be cleaned up according to specified standards regarding bioremediation.	Bluewave Capital SA (Pty) Ltd and EPC	Operation and maintenance
Spill kits must be made available on-site for the clean-up of spills and leaks of contaminants.	Bluewave Capital SA (Pty) Ltd and EPC	Operation and maintenance
Disposal of waste must be in accordance with relevant legislative requirements, including the use of licensed contractors.	Bluewave Capital SA (Pty) Ltd/waste management contractor and EPC	Operation
Waste handling, collection, and disposal operations must be managed and controlled by a waste management contractor.	Bluewave Capital SA (Pty) Ltd/waste management contractor and EPC	Operation
Used oils and chemicals: <ul style="list-style-type: none"> » Appropriate disposal must be arranged with a licensed facility in consultation with the administering authority » Waste must be stored and handled according to the relevant legislation and regulations 	Bluewave Capital SA (Pty) Ltd and EPC	Operation
General waste must be recycled where possible or disposed of at an appropriately licensed landfill.	Bluewave Capital SA (Pty) Ltd and	Operation

Mitigation: Action/Control	Responsibility	Timeframe
	EPC	
Hazardous waste (including hydrocarbons) and general waste must be stored and disposed of separately.	Bluewave Capital SA (Pty) Ltd and EPC	Operation
Disposal of waste must be in accordance with relevant legislative requirements, including the use of licensed contractors.	Bluewave Capital SA (Pty) Ltd and EPC	Operation

Performance Indicator	<ul style="list-style-type: none"> » No complaints received regarding waste on site or indiscriminate dumping. » Internal site audits identifying that waste segregation recycling and reuse is occurring appropriately. » Provision of all appropriate waste manifests. » No contamination of soil or water.
Monitoring	<ul style="list-style-type: none"> » Waste collection must be monitored on a regular basis. » Waste documentation must be completed and available for inspection » An incidents/complaints register must be maintained, in which any complaints from the community must be logged. » Complaints must be investigated and, if appropriate, acted upon. » Regular reports on exact quantities of all waste streams exiting the site must be compiled by the waste management contractor and monitored by the ECO. » All appropriate waste disposal certificates accompany the monthly reports.

OBJECTIVE: Mitigate the possible visual impact associated with the operational phase.

A visual impact on the sense of place is one that alters the visual landscape to such an extent that the user experiences the environment differently, and more specifically, in a less appealing or less positive light.

Project Component/s	Construction site, various buildings, a generator, a substation, a power line, a fence and internal access roads.
Potential Impact	(Function of the project, Height of the proposed development above ground, Choice of technology and materials, Project association with similar developments locally, context , Numbers and degree of sensitive receptors, Shielding and exposure)
Activity/Risk	The numbers of receptors would increase

Source	
Mitigation: Target/Objective	The project would be visually incompatible with its surrounds

Mitigation: Action/Control	Responsibility	Timeframe
No unsociable hours working; good traffic and site management and keeping local people informed	Bluewave Capital SA (Pty) Ltd/ operator and EPC	Throughout operational phase
Good traffic and site management and keeping local people informed	Bluewave Capital SA (Pty) Ltd/ operator and EPC	Throughout operational phase

Performance Indicator	The key indicators would be the definition of the impacts predicted and the qualities of the receiving environment. Reference to the VIA indicates the limited nature of the anticipated impacts and in addition, the ability of the landscape to absorb the development.
Monitoring	Baseline Monitoring: all plans to be reviewed timeously by bodies responsible for aesthetics. Operational Phase Monitoring: continued assessment of the aesthetic aspects, such as fencing and signage and controlling any expansion of the project.

OBJECTIVE: Minimise storm water runoff (guideline for storm water management plan)

Management of storm water will be required the operational phase of the facility. A detailed storm water management plan is required to be compiled as part of the final design to ensure compliance with applicable regulations and to prevent off-site migration of contaminated storm water or increased soil erosion. The section below provides a guideline for the management of storm water on site and will need to be supplemented with the relevant method statements during the operation phase of the facility.

Project Component/s	<ul style="list-style-type: none"> » Storm water management components. » Any hard engineered surfaces (i.e. access roads).
Potential Impact	» Poor storm water management and alteration of the hydrological regime (i.e. drainage lines).
Activities/Risk Sources	» Construction of the facility (i.e. placement of hard engineered surfaces).

Mitigation: Target/Objective	» Appropriate management of storm water to minimise impacts on the environment.
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Mitigation: Action/Control	Responsibility	Timeframe
A Method Statement for the management of storm water which also considers the recommendations below is to be submitted to the ECO prior to commencement of construction activities.	Bluewave Capital SA (Pty) Ltd and EPC	Operation
Reduce the potential increase in surface flow velocities and the resultant impact on the localised drainage system as a result of increased sedimentation through the implementation of appropriate erosion management measures.	Bluewave Capital SA (Pty) Ltd and EPC	Operation
Appropriately plan hard-engineered bank erosion protection structures.	Bluewave Capital SA (Pty) Ltd and EPC	Operation
Ensure suitable handling of storm water within the site (i.e. separate clean and dirty water streams around the plant and install stilling basins to capture large volumes of run-off, trapping sediments and reduce flow velocities) through appropriate design of the facility.	Bluewave Capital SA (Pty) Ltd and EPC	Operation
Design measures for storm water management need to allow for surface and subsurface movement of water along drainage lines so as not to impede natural surface and subsurface flows.	Bluewave Capital SA (Pty) Ltd and EPC	Operation

Performance Indicator	<ul style="list-style-type: none"> » Appropriate storm water management measures included within the facility design. » Sound water quality and quantity management during construction and operation.
Monitoring	» Devise a suitable surface water quality monitoring plan for implementation during construction and operation.

MANAGEMENT PROGRAMME: DECOMMISSIONING CHAPTER 9

The solar infrastructure which will be utilised for the proposed solar energy facility is expected to have a lifespan of 20 years (i.e. with maintenance). Equipment associated with this facility would only be decommissioned once it has reached the end of its economic life. It is most likely that decommissioning activities of the infrastructure of the facility would comprise the disassembly and replacement of the solar infrastructure with more appropriate technology/infrastructure available at that time.

The relevant mitigation measures contained under the construction and rehabilitation sections of this EMP should be applied during decommissioning and therefore is not repeated in this section. It must be noted that decommissioning activities will need to be undertaken in accordance with the legislation applicable at that time, which may require this section of the EMP to be revisited and amended.

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 by any relevant and competent authority at that time.

9.1. Site Preparation

Site preparation activities will include confirming the integrity of the access to the site to accommodate required equipment, preparation of the site (e.g. lay down areas, construction platform) and the mobilisation of construction equipment.

9.2 Disassemble and Replace Infrastructure

Disassembled components will be reused, recycled, or disposed of in accordance with regulatory requirements.

OBJECTIVE: To avoid and or minimise the potential impacts associated with the decommissioning phase

Project Component/s	» Decommissioning phase of the PV facility and associated infrastructure
Potential Impact	» Decommissioning will result in job losses, which in turn can result in a number of social impacts, such as

	reduced quality of life, stress, depression etc. However, the number of people affected (25) is relatively small. Decommissioning is also similar to the construction phase in that it will also create temporary employment opportunities.
Activity/Risk Source	» Decommissioning of the PV facility
Mitigation: Target/Objective	» To avoid and or minimise the potential social impacts associated with decommissioning phase of the PV facility.

Mitigation: Action/control	Responsibility	Timeframe
Retrenchments should comply with South African Labour legislation	Bluewave Capital SA (Pty) Ltd and EPC	When PV facility is decommissioned

Performance Indicator	» South African Labour legislation relevant at the time
Monitoring	» Bluewave Capital SA (Pty) Ltd and Department of Labour

FINALISATION OF THE EMP

CHAPTER 10

The EMP is a dynamic document, which must be updated to include any additional specifications as and when required. It is considered critical that this draft EMP be updated to include site-specific information and specifications following the final walk-through survey by specialists of the development footprint. This will ensure that the construction and operation activities are planned and implemented considering sensitive environmental features.

**APPENDIX A:
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.

1 It should be noted that the grievance mechanism does not replace the right of an individual, community, group or organization to take legal action should they so wish. However, the aim should be to address grievances in a manner that does not require a potentially costly and time consuming legal process.

2

Proposed generic grievance process

- Local landowners, communities and authorities will be informed in writing by the proponent (the renewable energy company) of the grievance mechanism and the process by which grievances can be brought to the attention of the proponent.
- A company representative will be appointed as the contact person for grievances to be addressed to. The name and contact details of the contact person will be provided to local landowners, communities and authorities.
- Project related grievances relating to the construction, operational and or decommissioning phase must be addressed in writing to the contact person. The contact person should assist local landowners and or communities who may lack resources to submit/prepare written grievances.
- The grievance will be registered with the contact person who, within 2 working days of receipt of the grievance, will contact the Complainant to discuss the grievance and agree on suitable date and venue for a meeting. Unless otherwise agreed, the meeting will be held within 2 weeks of receipt of the grievance.
- The contact person will draft a letter to be sent to the Complainant acknowledging receipt of the grievance, the name and contact details of Complainant, the nature of the grievance, the date that the grievance was raised, and the date and venue for the meeting.
- Prior to the meeting being held the contact person will contact the Complainant to discuss and agree on who should attend the meeting. The people who will be required to attend the meeting will depend on the nature of the grievance. While the Complainant and or proponent are entitled to invite their legal representatives to attend the meeting/s, it should be made clear that to all the parties involved in the process that the grievance mechanism

process is not a legal process. It is therefore recommended that the involvement of legal representatives be limited.

- The meeting will be chaired by the company representative appointed to address grievances. The proponent will provide a person to take minutes of and record the meeting/s. The costs associated with hiring venues will be covered by the proponent. The proponent will also cover travel costs incurred by the Complainant, specifically in the case of local, resource poor communities.
- Draft copies of the minutes will be made available to the Complainant and the proponent within 4 working days of the meeting being held. Unless otherwise agreed, comments on the Draft Minutes must be forwarded to the company representative appointed to manage the grievance mechanism within 4 working days of receipt of the draft minutes.
- In the event of the grievance being resolved to the satisfaction of all the parties concerned, the outcome will be recorded and signed off by the relevant parties. The record should provide details of the date of the meeting/s, the names of the people that attended the meeting/s, the outcome of the meeting/s, and where relevant, the measures identified to address the grievance, the party responsible for implementing the required measures, and the agreed upon timeframes for the measures to be implemented.
- In the event of a dispute between the Complainant and the proponent regarding the grievance, the option of appointing an independent mediator to assist with resolving the issue should be discussed. The record of the meeting/s will note that a dispute has arisen and that the grievance has not been resolved to the satisfaction of all the parties concerned;
- In the event that the parties agree to appoint a mediator, the proponent will be required to identify three (3) mediators and forward the names and CVs to the Complainant within 2 weeks of the dispute being declared. The Complainant, in consultation with the proponent, will identify the preferred mediator and agree on a date for the next meeting. The cost of the mediator will be borne by the proponent. The proponent will provide a person to take minutes of and record the meeting/s.
- In the event of the grievance, with the assistance of the mediator, being resolved to the satisfaction of all the parties concerned, the outcome will be recorded and signed off by the relevant parties, including the mediator. The record should provide details on the date of the meeting/s, the names of the people that attended the meeting/s, the outcome of the meeting/s, and where relevant, the measures identified to address the grievance, the party responsible for implementing the required measures, and the agreed upon timeframes for the measures to be implemented.
- In the event of the dispute not being resolved, the mediator will prepare a draft report that summarizes the nature of the grievance and the dispute. The report should include a recommendation by the mediator on the proposed way forward with regard to the addressing the grievance.

- The draft report will be made available to the Complainant and the proponent for comment before being finalised and signed by all parties. Unless otherwise agreed, comments on the draft report must be forwarded to the company representative appointed to manage the grievance mechanism within 4 working days.

The way forward will be informed by the recommendations of the mediator and the nature of the grievance. As indicated above, the grievance mechanism does not replace the right of an individual, community, group or organization to take legal action should they so wish. In the event of the grievance not being resolved to the satisfaction of Complainant and or the proponent, either party may be of the opinion that legal action may be the most appropriate option.

**APPENDIX B:
DEPARTMENT OF WATER AFFAIRS: WORKING FOR
WATER PROGRAMME PRINCIPLES FOR INVASIVE
PLANT SPECIES**

METHODS FOR ALIEN SPECIES REMOVAL

The sections below are taken from the Department of water Affairs: Working for Water Programme, whose guidelines and policies on alien plant species removal should be adhered to.

In general the use of herbicide by is strongly discouraged – unless for direct stump applications in areas at least 30 m from any type of wetland. This is due to the potential for herbicide and related compounds to be distributed into the wetland areas and thus damaging indigenous vegetation all along the watercourses and beyond.

Any control programme for alien vegetation must include the following 3 phases:

- Initial control: drastic reduction of existing population
- Follow-up control: control of seedlings, root suckers, and coppice growth
- Maintenance control: sustain low alien plant numbers with annual control

2.1. Mechanical Clearing

2.1.1. ADULT PLANTS AND SAPLINGS

2.1.1.1. Felling

Consider as first option where possible, but see section 3 regarding kill standing – although this is only mandatory in pristine or near-natural environments, kill standing may have to be considered where the tree to be felled on the project area is very large or tilted and by falling it could significantly damage the surrounding habitat or other structures.

Where trees are to be felled and removed, the stem/trunk shall be cut as close to the ground as possible but not higher than 150mm, using chainsaws, bow saws, brush cutters or cane knives. Where felling is to be followed by herbicide treatment the cut shall either be made by means of a saw, so as to produce a clean, flat and generally horizontal surface or in the case of suitably small, thin barked species, the stem shall be cut with a lopper. A slasher or kapmes should preferably not be used because of the diagonal cut that is produced. This minimises the herbicide absorption and the “sharp sticks” are a Health and Safety risk.

In the case of larger trees, they shall, where possible, be felled to fall uphill in order to reduce breakage and minimise the danger to workmen.

Felled material and other dead material (brush and logs) shall not be allowed to block or impede water courses and must be removed from all water courses, either 30 m away from the river or out of the flood line itself.

Felled material (thicker than 7 cm) shall be debranched and cross cut in manageable logs of not longer than 2,4 m or in lengths as directed and then stacked in windrows (brush lines) with the contour or moved to or from identified locations as directed by Project Management.

The logs and brush shall be stacked separately, at least 3 m apart. Windrows shall be with gaps of 2 m every 15 m and be as narrow as possible but not wider than 3 m. Where windrows are impractical heap stacking may be allowed after approval by the Project Manager. Heaps shall be spaced at a minimum distance of 20 m with a maximum ground cover of 16 m² in other words heaps of maximum 4 X 4 m.

Windrows must be a minimum of 10 meters away from any indigenous forest (10 or more closely spaced indigenous trees). On a slope nothing should be packed below the indigenous forest, because burning of the windrows will cause damaged to the indigenous forest by burning up into it.

2.1.1.2. Ring barking

Where ring barking is directed, the Contractor shall remove all bark (including the inner bark or phloem) from ground level to 50 cm up or such lesser distance as may be specified. All bark must be removed to below ground level for good results. Where clean de-barking is not possible due to crevices in the stem or where exposed roots are present, a combination of bark removal and basal stem treatments should be carried out.

Bush knives or hatchets should be used for debarking. Herbicide can be applied to the exposed bark except in the case of Wattle spp. In the case of smaller trees and saplings with soft, thin skinned bark (especially *Acacia* and *Hakea* species.) the stem shall be beaten with the back of a hatchet and the bark peeled off.

2.1.1.3. Frilling

Where frilling is directed, the Contractor shall, at a height of approximately 50 cm, using an axe or bush knife, make angled cuts downward into the cambium layer through the bark in a ring. Ensure to affect the cuts around the entire stem and apply herbicide into the cuts.



The Frilling Method



2.1.1.4. Bark Stripping

Where bark stripping is specified all bark shall be stripped from the trunk between ground level and 1 m above ground level.

2.1.2. SEEDLINGS

2.1.2.1. Manual clearing

Where seedlings are relatively sparse, less than 1 m high and soil suitably soft or where specified in the Project Specification (where seedlings are growing in sensitive areas where chemicals cannot be used due to the risk of contamination or effect on adjacent plant populations or for any other reason), seedlings shall be removed by hand pulling which shall be so carried out as to ensure the removal of the roots. Hand pulled plants shall be left hanging on other vegetation or deposited in a pile to reduce the possibility of re-growth.

Where seedlings are dense or are too well established to be removed by hand and the Project Management has not directed hand pulling or herbicide treatment of the undisturbed plants, the seedlings shall be cut using a lopper or brush cutter (written approval must be obtained) and the stems then treated with herbicide.

It is anticipated that after initial clearing, every year there will be a multitude of seedlings of alien species emerging. Cleared sites will thus have to be constantly monitored, and as soon as a seedling can be identified as alien invasive species, these must be pulled out by hand.

2.2. Chemical Treatment

2.2.1. Foliar spray

(Not recommended due to potential distribution of poison beyond target plants and thus killing of indigenous species)

Where foliar spray has been specified, the spray shall be applied as to the leaves of the whole plant to the point of drip-off. Spraying shall not be done when the leaves are wet or in windy conditions. The herbicide shall under all circumstances be mixed with a suitable colour dye (if the product has no built in dye) and a wetting agent if specified on the herbicide label. Where the same herbicide is use for different methods e.g. foliar and cut-stump, different colour dyes must be used to identify the different herbicide mix ratios.

Spraying shall be done using a back-pack spraying system with a solid cone nozzle which allows for consistent, thorough application of the herbicide (e.g. Spraying systems TG 0,5 (or as indicated in the herbicide policy)).

2.2.2. Cut-stump treatment



Where stumps are to be treated with herbicide the herbicide shall under all circumstances be mixed with a suitable colour dye (if the product has no built in dye) and a wetting agent if specified on the herbicide label, this shall be applied as soon as possible but not later than 15 minutes after felling, stripping or frilling. In the case of felled stumps all sawdust shall first be brushed off the cut surface.

A knapsack or handheld pressurised spray can, with a narrow angle solid cone nozzle or adjustable nozzle set to a solid spray, should be used. The pressure should be as low as possible to avoid the herbicide from bouncing off the sprayed surface and to minimise contamination; attention must be paid to achieving an even coverage only on the outer rim (Cambium area).

2.2.3. Basal bark application

(Only after written approval has been obtained, due to environmental damage caused by diesel)

Where directed and after written approval, herbicide shall be applied directly to the basal bark of trees. The herbicide shall be applied by knapsack sprayer as a coarse, low

pressure spray, using a narrow angle solid cone nozzle, all around the basal stem or trunk of the plant, from the ground up to the height as specified on the herbicide label, as well as to any exposed roots. The area to be treated shall be thoroughly wetted by the herbicide. Attention shall be paid to ensuring adequate application taking note of the condition and age of the bark.

In the case of multi-stemmed plants, each stem shall be treated.

2.3. Kill Standing vs. Felling

This section is to further explain the National Circular 18 of 2002 under the same heading.

As this National Circular contains a policy clause on the operational approach all WfW projects need to align their operations accordingly as a matter of urgency. The policy should be interpreted as follows (National policy in *Italic* font with interpretation in normal font):

All trees must be killed standing (i.e. NOT felled), except when the following applies: (where cut stump operations are underway on a property this will be allowed to be finished if negotiations for the property has already been concluded and written into the landowner's agreement, negotiations on new areas should thus be adapted accordingly as no further cut stump operations will be allowed except as indicated below):

- *Danger to lives & property and the tree must be removed* (it is the responsibility of Project Management to assess this with the assistance of the landowner. These findings must be recorded in writing and should form part of the landowner's agreement. The person collecting the data for contract generation should be informed accordingly)
- *All alien clearing within two tree lengths of roads, buildings, power lines etc* (fences should be added to the possibilities. It is the responsibility of Project Management to assess this with the assistance of the landowner. These findings must be recorded in writing and should form part of the landowner's agreement. The person collecting the data for contract generation should be informed accordingly)
- *Specific requirement of a partnership to fell* (this will be when the Programme and what it stands for will directly benefit from an operation other than frilling e.g. secondary industry operations, if this is not the case then the landowner must contribute to the price difference due to a change in the preferred operational method)
- *Where required to remove trees for specific flood-control measures* (no frilling should take place within the riparian zone that is the 1:20 year flood level or closer than 30 metres from the natural bank of a river. Trees in these areas should be removed.)
- *Where frilling is not a practical method due to tree growth form, treatment efficacy* (It is the responsibility of Project Management to assess this. If these exceptions

influence the workload then the person collecting the data for contract generation should be informed of such exceptions)

- *Where the frilling of trees increases the fire danger in the area* (where such a scenario is suspected Project Management should liaise with the landowner and also get the opinion of a reputable person, these findings should be recorded in writing and added to the landowner's agreement)

In most cases the resistance towards frilling are based on the aesthetics of the area after the operation. The most economical and effective method of eradicating invasive alien vegetation within the Programme's guidelines should remain the prime objective of efforts. It is the obligation and responsibility of people in all spheres of management to maximise the effect and efficiency of any eradication programme.

2.4. Species-specific clearing methods

Various herbicides have been registered for the control of alien invasive species. The first option though should always be felling the species as low as possible, followed by localised stump treatment and the remaining only as last-resort alternatives or where the alien is a vicious multi-stemmed scrambler, such as the bramble.

Chemicals do not only come at a cost, but will require proper storage, management, and handling. For operation details refer to the Working for Water Operational Standards spreadsheet provided separately.

Information for each invasive alien species as encountered on the project area, as well as alien invasive species that are highly likely to become established after initial clearing, is listed below.

OBJECTIVE: Optimise Operational Standards for Clearing of Invasive Alien Plants

The Contractor must take all reasonable measures to ensure the efficient use of manpower, operational equipment and chemicals for the systematic eradication of alien invasives on site.

Project component/s	Project components affecting the objective: <ul style="list-style-type: none"> » solar energy turbines » access roads » substation » power line
Potential Impact	<ul style="list-style-type: none"> » Hazards to landowners, workers and public » Security of materials » Substantially increased damage to adjacent sensitive vegetation and wetland areas
Activities/risk sources	<ul style="list-style-type: none"> » Operation of equipment » Use of herbicides » Use of fire » Distribution of regenerative material of invasive alien plants
Mitigation: Target/Objective	<ul style="list-style-type: none"> » To ensure effective systematic removal of invasive alien plants » To prevent additional spreading of invasive alien plants » To maintain low numbers and eventually eradicate unwanted species from the project area » To prevent any spillage of chemicals into the surrounding environment » To prevent and reverse damage to wetlands/pans caused by invasive alien plants » To protect members of the public/landowners/residents
Timeframe	<ul style="list-style-type: none"> » Training required: training schedule and training opportunities identified and started within three months of commencement of clearing

	<ul style="list-style-type: none"> » Initial control involving planning and drastic reduction of existing population: during site establishment and construction phase » Follow-up control: control of seedlings, root suckers and coppice growth: during construction and operational phase » Maintenance control: sustain low alien plant numbers with annual control: during operational and decommissioning phase 												
Abbreviations	<ul style="list-style-type: none"> » Working for Water Programme (WfW) » Health and Safety (H&S) 												
Responsibility	<table border="1"> <thead> <tr> <th colspan="2">RESPONSIBLE PERSON OR UNIT</th> </tr> </thead> <tbody> <tr> <td>PROJECT MANAGER</td> <td>PM</td> </tr> <tr> <td>CONTRACTOR/COMMUNITY WORKER</td> <td>C</td> </tr> <tr> <td>ENVIRONMENTAL CONTROL OFFICER / COMMUNITY LIASION OFFICER</td> <td>ECO</td> </tr> <tr> <td>TRAINING UNIT</td> <td>TU</td> </tr> <tr> <td>PLANNING UNIT</td> <td>PU</td> </tr> </tbody> </table>	RESPONSIBLE PERSON OR UNIT		PROJECT MANAGER	PM	CONTRACTOR/COMMUNITY WORKER	C	ENVIRONMENTAL CONTROL OFFICER / COMMUNITY LIASION OFFICER	ECO	TRAINING UNIT	TU	PLANNING UNIT	PU
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PLANNING UNIT	PU												

Mitigation: Action/control	Responsibility
1. PROJECT OPERATIONAL PLANNING	
1.1. Creation of detailed map of the area: Provides an overview of the project and it must indicate the following:	
<ul style="list-style-type: none"> • Project boundaries 	PU
<ul style="list-style-type: none"> • Area/s where workers are sourced from 	PM
<ul style="list-style-type: none"> • Other features relevant to project wetlands, invasive thickets, grazing areas, cultivated areas 	PM, PU

Mitigation: Action/control	Responsibility
<ul style="list-style-type: none"> Clearly indicate areas that need to be cleared and divide into different Management Units according to location and most prevalent invasive 	PM, PU
1.2. Strategic plan and safety	
<ul style="list-style-type: none"> Project Management to create an Area Strategic Plan / Method Statement for clearing alien invasive vegetation 	ECO, PM
<ul style="list-style-type: none"> Project Management to be familiar with the Area Strategic Plan 	ECO, PM
<ul style="list-style-type: none"> Evidence of Rules & Regulations given and explained to Contractor or Community Workers (this should include the Operating Standards) 	PM, C
<ul style="list-style-type: none"> Emerging and potential weeds reported through agreed communication lines, ecologist can be consulted for proper identification 	PM
<ul style="list-style-type: none"> A copy of the emergency plan and telephone numbers must be on site, workers must demonstrate knowledge thereof 	PM
1.3. Management Unit Clearing Plan (MUCP)	
<ul style="list-style-type: none"> It must be up to date 	PU, PM
<ul style="list-style-type: none"> A clearing strategy must be evident and supported by the planned priorities 	PU, PM
<ul style="list-style-type: none"> Project Managers must be able to show actual work done vs. planned work, supported by fixed point photographs 	PM

2. TOOLS AND EQUIPMENT	
2.1. Hand tools in good condition and used correctly	
<ul style="list-style-type: none"> • Hand tools(e.g. lopper, pruning saw etc.) must be best suited to the work and the size of plants being cleared 	PM, C
<ul style="list-style-type: none"> • The tools must have correct and properly secured handles and must be in safe working order 	C
<ul style="list-style-type: none"> • A sharpening stone/file, with a hand grip, must be on site 	C
<ul style="list-style-type: none"> • Gloves and goggles must be worn when sharpening tools 	C
<ul style="list-style-type: none"> • The tools must be used in the correct manner; clearing must be done using the correct techniques 	C, PM
<ul style="list-style-type: none"> • Safe working distances of at least two (2) tool-reach lengths apart must be maintained 	C, PM
2.2. Chainsaws good condition and used correctly	
<ul style="list-style-type: none"> • Operators have received certified training in chainsaw operation, felling, cross-cutting and de-branching techniques and have been assessed for competence every six months. For training opportunities contact the regional WfW or otherwise qualified entity 	PM, TU
<ul style="list-style-type: none"> • The chainsaws must be best suited to the clearing work and timber size 	PM, C
<ul style="list-style-type: none"> • There must be a service maintenance schedule for all chainsaws Services (daily, weekly) are done and recorded 	PM, C
<ul style="list-style-type: none"> • Safety and operational features must be in good order as per standard checklist 	PM, C
<ul style="list-style-type: none"> • Chainsaw work is planned and executed for safe and efficient production 	PM, C
<ul style="list-style-type: none"> • Correct felling / clearing techniques are applied 	PM, C
<ul style="list-style-type: none"> • Correct cross-cutting and de-branching techniques are applied. 	PM, C

<ul style="list-style-type: none"> • Correct re-fuelling procedures are followed to prevent spillages 	C
<ul style="list-style-type: none"> • Chain sharpening is correctly done with the correct tools at each refueling 	C
2.3. In-field fuel site	
<ul style="list-style-type: none"> • A cleared area, at least six (6) metres from rest areas, demarcated with hazard tape must be used to store fuel 	C
<ul style="list-style-type: none"> • Fuel and oil containers at the in-field fuel site must be stored on an absorbent drip-mat or drip-tray 	C
<ul style="list-style-type: none"> • A 2 kg dry chemical powder (DCP) fire extinguisher must be at least 3m distant from the fuel site and easily visible 	C
3. STORES, WORKSHOPS AND OFFICES	
3.1. Stores, workshops and offices	
<ul style="list-style-type: none"> • Buildings and containers must be secure and provide safe storage space for equipment and/or supplies 	PM
<ul style="list-style-type: none"> • The office / stores area must show a high standard of housekeeping (A place for everything, everything in its place) 	PM
3.2. Herbicide stores	
<ul style="list-style-type: none"> • The building / container must meet the Herbicide Policy standards 	PM
<ul style="list-style-type: none"> • A Material Safety Data Sheet and Label must be in the store for each stock category of herbicide stored. (Each product.) 	PM
<ul style="list-style-type: none"> • Herbicides must be issued with reference to the WIMS contract number 	PM
<ul style="list-style-type: none"> • There must be stock control of empty containers. 	

<ul style="list-style-type: none"> • Empty containers must be stored until removal by a registered recycling company 	ECO
<ul style="list-style-type: none"> • Excess, undiluted herbicide must be returned to the stores and noted on the stock sheet. Excess, diluted herbicide must be stored in a UV-resistant container and allocated to another treatment within 2 days or returned to a suitable container in the stores 	ECO, C
<ul style="list-style-type: none"> • Burning of empty containers by Project staff or Contractor is prohibited 	PM, C
3.3. Fuel and flammable liquids stores	
<ul style="list-style-type: none"> • The building / container must be suitable for the liquids stored in them 	ECO
<ul style="list-style-type: none"> • Quantities limited to allowed maximum per class where proper storage facilities are not available: <ul style="list-style-type: none"> ○ Class I – 45L (petrol, thinners) ○ Class II – 270L (diesel, lube oils) 	
<ul style="list-style-type: none"> ○ Class I – 45L (petrol, thinners) 	PM
<ul style="list-style-type: none"> ○ Class II – 270L (diesel, lube oils) 	PM
<ul style="list-style-type: none"> • Proper housekeeping and handling procedures must be evident 	PM
<ul style="list-style-type: none"> • Adequate measures to deal with spillage and contamination e.g. spill kit 	PM
<ul style="list-style-type: none"> • Correct signage and fire-fighting equipment e.g. dry chemical powder fire extinguisher of at least 2.25kg 	PM
3.4. Storage at contractor stores / houses: Where contractors cannot make use of proper dedicated stores, the following standards apply:	
<ul style="list-style-type: none"> • All equipment, supplies, herbicides, fuel and oils must be safely and securely stored with controlled access, in a suitable lockable building, container or a lockable trailer 	C
<ul style="list-style-type: none"> • A 1kg dry chemical powder (DCP) fire extinguisher must be available outside the store / container 	C

<ul style="list-style-type: none"> PM to annually verify and keep record of inspection of compliance regarding storing facilities at contractors store / house 	PM
4. HERBICIDES	
4.1. General	
<ul style="list-style-type: none"> Workers must be specifically allocated and trained to work with herbicides and demonstrate knowledge of the risk of working with the selected chemicals and how to avoid that risk 	TU, PM
<ul style="list-style-type: none"> Only registered herbicides as detailed in the WfW herbicide policy or on the product label may be used 	PM
<ul style="list-style-type: none"> A Material Safety Data Sheet (MSDS) and Label must be in the field for each product used 	PM, C
<ul style="list-style-type: none"> Written approval must be obtained via the approved communication channels from the National Office to use an unregistered herbicide for a particular specie or situation 	PM, ECO
<ul style="list-style-type: none"> Mix water must be clean & clear (not muddy) 	C, PM
<ul style="list-style-type: none"> Spray mix adjuvants (e.g. wetters, buffers etc.) must be used according to label instructions 	PM, C
<ul style="list-style-type: none"> In the absence of a built-in colourant a suitable dye must be used in applications 	PM, C
<ul style="list-style-type: none"> Contractors and applicators must demonstrate an understanding of why herbicide applications should not be done in unsuitable weather conditions; e.g. foliar application in windy conditions 	C
<ul style="list-style-type: none"> Quality check records must show that application methods are monitored for targeting, rates and spray drift 	C, PM
<ul style="list-style-type: none"> Where there is a risk of herbicide applicators entering water, knapsacks should be filled only half full 	C, PM
<ul style="list-style-type: none"> PM must submit a Herbicide-used sheet for every completed contract, information must be captured 	PM, PU

<ul style="list-style-type: none"> • Herbicide applicators must demonstrate an understanding of spot spray patterns 	C
<ul style="list-style-type: none"> • For cut-stump / frill / ring-barking, coverage must be even and spraying must be monitored to limit excessive run-off 	C
4.2. Equipment	
<ul style="list-style-type: none"> • Equipment must be properly maintained according to regular scheduled services 	C
<ul style="list-style-type: none"> • Equipment must not leak. Faulty equipment must be serviced or decommissioned 	C
<ul style="list-style-type: none"> • Equipment appropriate to the application method and treatment must be used. 	PM, C
<ul style="list-style-type: none"> • When using knapsack sprayers the following apply: <ul style="list-style-type: none"> ○ Knapsack sprayers must be fitted with pressure regulators set to the correct pressure (1bar / 100Kpa) or fitted with a constant flow valve ○ Knapsack sprayers must be fitted with the correct nozzle in good condition, appropriate for the application method used (e.g. TG1; FL5VS; TFVS2 or equivalent) 	PM, C
<ul style="list-style-type: none"> • Lances must be secured to prevent damage when transporting. 	C
<ul style="list-style-type: none"> • Washing of equipment must take place in a designated area, using the triple-rinse method 	C
4.3. Safe storage and handling in-field	
<ul style="list-style-type: none"> • In a designated, shaded demarcated area <ul style="list-style-type: none"> ○ Away from rest / eating areas ○ At least 20m from any water body ○ Away from crops, gardens etc. 	C
	C
	C
	C

○ Floor area covered suitable absorbent material	C
○ Bucket & spade must be available in case of spills	C
○ Clean water, washing bucket, soap & towel must be available for persons handling the herbicide & equipment	C
• Mixing containers must be UV resistant and leak proof	C
• Mixing containers must be clearly labeled, showing the brand name and concentration of the contents	C
• Refilling, mixing, washing and rinsing should only be done within the demarcated area	C
• Empty product containers must be triple-rinsed and punctured before it is returned to the store	C
• Rinsed water must be recycled for subsequent mixes	C
• Contractors must have proper records of daily herbicide mixtures and issues and actual herbicide use in the contracting teams on-site	C
5. SAFETY	
5.1. Hazard Identification and Risk Assessments (HIRA)	
• The HIRA process to be developed, recorded and available at the project / area and knowledge demonstrated by everyone.	PM,C
• Site Emergency Evacuation Plan must be drafted and communicated to all personnel.	PM,C
• Where relevant, hazards in the working area must be taped off. e.g. trenches, holes, hang-ups etc.	C
• The Written Safe Work Procedures Manual must be available, understood and adhered to by all working staff.	PM, C

5.2. First Aid kit	
<ul style="list-style-type: none"> • A first aid kit, fully stocked according to the standard stock list, must be easily accessible at all work sites, and regularly inspected by the PM. 	PM, C
<ul style="list-style-type: none"> • All first aid treatment and usage of stock must be recorded in the dressing book kept on site / regional office. 	C, PM
<ul style="list-style-type: none"> • The First Aid kit must be under control of a trained First Aider with a current valid certificate 	C, PM
<ul style="list-style-type: none"> • There must be an alternative trained First Aider of opposite gender in the team 	C
<ul style="list-style-type: none"> • A list of emergency numbers must be kept in the first aid box e.g. ambulance, doctor, hospital, fire brigade, poison info centre 	C, PM
<ul style="list-style-type: none"> • A copy of the competency certificate of the first-aider must be kept on-site in the H&S file. 	C, PM
5.3. Personal Protective Equipment and Clothing (PPE)	
<ul style="list-style-type: none"> • PPE must meet the minimum prescribed standards of quality (EU or SABS). 	C, PM
<ul style="list-style-type: none"> • PPE must be replaced when it becomes ineffective through wear & tear. 	C, PM
<ul style="list-style-type: none"> • PPE must be provided with due consideration to the hazard exposure as well as the PPE requirements as per occupation 	C, PM
<ul style="list-style-type: none"> • A record must be kept of all PPE issued to contractors and workers, and signed for by them, with the acknowledgement to wear the PPE. 	PM, C
<ul style="list-style-type: none"> • Project must conform to acceptable H&S Guidelines 	PM, C
5.4. Substance abuse	
<ul style="list-style-type: none"> • The use of any mind altering substances is not allowed on-site (e.g. alcohol, dagga). 	PM, C

<ul style="list-style-type: none"> Persons in the WfW programme must demonstrate knowledge of the potential dangers and the workplace policy of drug use 	ECO, PM, C
5.5. Extreme Weather Conditions	
<ul style="list-style-type: none"> Demonstrate knowledge that no work in / near / on water bodies may take place during rain or lightning. 	PM,C
<ul style="list-style-type: none"> No felling or spray application of herbicides may take place during high wind conditions 	PM,C
<ul style="list-style-type: none"> The contractor should be informed of any adverse weather conditions 	PM
6. METHOD OF WORK	
6.1. Appropriate clearing methods applied	
<ul style="list-style-type: none"> A process of appropriate clearing method selection must be followed and recorded - use the species guide provided 	PM
<ul style="list-style-type: none"> Handling / processing of cleared material must be kept to a minimum, but due to a potential fire hazard and the allelopathic effect of leaf litter, cleared material must not be left on site. A specific area must be designated to stack and process material to make maximum use of wood for community members, whilst regenerative material must be destroyed by controlled burning. 	PM, C
<ul style="list-style-type: none"> A copy of the Treatment Methods table must be available in the Project Office 	PM
<ul style="list-style-type: none"> No frilling / ring barking is allowed within two (2) tree lengths of roads, fences, telephone and power lines, infrastructure (e.g. buildings) or in the riparian zone of a river 	PM
6.2. Follow-up done timeously	
<ul style="list-style-type: none"> An up-to-date follow-up plan must be used to ensure treatment is done on time 	PM

<ul style="list-style-type: none"> For foliar treatment there must be sufficient newly-growing foliage and plants must not exceed hip height 	PM, C
<ul style="list-style-type: none"> When follow-up operations are not done at the most cost-efficient stage, there must be specific reasons on record including cost/person day variations between planned and actual follow-up to be recorded 	PM
6.3. Efficient team operation	
<ul style="list-style-type: none"> Operational planning for the specific site must be evident. Different tasks must be coordinated in an efficient manner for optimum productivity. If possible, every management unit mapped should have its own team allocated. 	PM, C
<ul style="list-style-type: none"> Tool use and tasks must be in line with the site-specific requirements 	C
<ul style="list-style-type: none"> Daily or weekly production tasks must be set and actual production must be measured and recorded 	C
6.4. Work methods conform to WfW standards	
<ul style="list-style-type: none"> Record of inspection of method, quantity and quality according to the contract. 	PM, C
<ul style="list-style-type: none"> All invasive alien species treated within the contract boundaries 	PM, C
7. ENVIRONMENTAL AWARENESS	
7.1. Site clean and free of litter and waste	
<ul style="list-style-type: none"> There must be no litter from clearing activities on work sites, at any time and there must be a litter bag on site at the demarcated gathering area, cleared or removed daily and disposed of in an acceptable manner. 	C

<ul style="list-style-type: none"> Existing litter not cleared in light of possible health risks, that may be associated with certain waste, reported to PM and disposal solution with relevant authority found 	PM, C
<ul style="list-style-type: none"> Project Manager and contractors to demonstrate knowledge that soil contaminated with oil must be appropriately treated and disposed of at a permitted landfill site. 	PM, C
<ul style="list-style-type: none"> When loose waste material is transported on vehicles, it must be adequately tied down / covered and contained. 	PM, C
7.2. Sanitation	
<ul style="list-style-type: none"> As far as practically possible, provide formal sanitation (chemical or water-born). Where this is not possible, a spade and toilet paper must be easily accessible on every site. 	C
<ul style="list-style-type: none"> Human waste and used toilet paper must be buried at least 20 m distant from any watercourses or bodies and at least 50 cm deep. 	C
<ul style="list-style-type: none"> In sensitive areas (urban sites, wetlands) a portable toilet must be provided on site and the waste removed and disposed of in an acceptable manner. 	C
<ul style="list-style-type: none"> Clean water and soap must be provided and used for hand washing. 	C
<ul style="list-style-type: none"> The workers should be informed of personal hygiene and demonstrate its practice 	C, PM
<ul style="list-style-type: none"> Where relevant, sufficient toilets per gender need to be available 	C, PM
7.3. Access routes	
<ul style="list-style-type: none"> Existing access routes must be used. Where new access routes or paths are required, these must be planned and made in co-operation with the landowner / manager and marked with hazard tape 	PM, C
7.4. Indigenous plants and animals	
<ul style="list-style-type: none"> Indigenous plants should not be damaged where possible and animals must not be harmed. 	C

<ul style="list-style-type: none"> • Alien trees with bird nests must be killed standing where possible. Site records must be kept. 	PM, C
<ul style="list-style-type: none"> • Collection of plant parts of alien plants for medicinal or other purposes, may only take place with the appropriate permission. Collection records must be kept. 	C
<ul style="list-style-type: none"> • Identify and protect indigenous plants and animals, especially: <ul style="list-style-type: none"> ○ Red list data species (none recorded) ○ Protected plants (see species of conservation concern) ○ Sensitive communities (wetlands only, no other recorded on project area) ○ Wetlands 	C
<ul style="list-style-type: none"> • No species of animal may be poached, snared, hunted, captured or willfully harmed, damaged or destroyed. Snares must be reported to land owners, PM or conservation authorities and removed immediately. 	C
<ul style="list-style-type: none"> • Snakes and other reptiles that may be encountered on the treatment area must not be killed. 	C
<ul style="list-style-type: none"> • Anthills and/or termite nests that occur must not be disturbed. 	C
<ul style="list-style-type: none"> • Keep the relevant managers informed of dangerous or problem animals. Record sightings and encounters. 	PM, C
<ul style="list-style-type: none"> • Keep food and rubbish out of reach of scavengers, e.g. apes and birds. 	C
<p>7.5. Invasive alien plant identification (IAP)</p>	
<ul style="list-style-type: none"> • Alien invasive plants including aquatic alien plants must be identified, where required expert assistance must be used. 	PM, C
<ul style="list-style-type: none"> • The relevant species to be removed must be pointed out to contractors and workers on site. 	PM

<ul style="list-style-type: none"> • Damage to indigenous / desirable vegetation must be minimised. 	C
7.6. Alien invasive dispersal	
<ul style="list-style-type: none"> • Where cleared material must be moved from the site, measures must be taken to prevent dispersal of reproductive material (e.g. seeds, cuttings). 	PM, C
<ul style="list-style-type: none"> • Chipped plant material must be free of seed if used off-site (e.g. mulch). 	PM, C
<ul style="list-style-type: none"> • Plants which have been removed must not be transported across or near to rivers or dams in which the species is absent. 	PM, C
<ul style="list-style-type: none"> • Removed plants must not be stacked on top of indigenous flora. 	PM, C
<ul style="list-style-type: none"> • Method and specifications chosen with due consideration of impact on the site, natural vegetation & regeneration. 	PM
<ul style="list-style-type: none"> • Methods used must ensure that weeds are not distributed by the contractor and employees 	PM, C
7.7. Site stabilisation / anti-erosion / rehabilitation measures	
<ul style="list-style-type: none"> • Stack larger cut logs along the contour and below knee height with 2 m gaps at 10 to 15 m intervals for access, escape, animal movement and to reduce run-off and soil movement where there is an enhanced erosion risk along stream banks or steeper slopes 	PM, C
<ul style="list-style-type: none"> • Preserve indigenous plant cover and adapt treatment methods to allow indigenous plants to colonize the site. 	PM, C
<ul style="list-style-type: none"> • Identify sites requiring additional stabilisation structures / measures / re-vegetation and obtain expert advice & planning to implement. 	PM
<ul style="list-style-type: none"> • Take precautionary measures to protect stabilising plants (planted & natural) during follow-up spraying. 	C

7.8. Site stabilisation / anti-erosion / rehabilitation records	
<ul style="list-style-type: none"> Sites must be mapped and a unique Treatment Area number must be assigned. Comprehensive planting / maintenance records must be kept; including dates, species and number of plants and follow-up care. 	PM
<ul style="list-style-type: none"> A record of input costs must be kept, including: materials, plants, seeds, person-days etc. 	PM
8. FIRE FIGHTING AND PROTECTION	
8.1. Fire Precautions on work sites	
<ul style="list-style-type: none"> Smoking allowed in safe indicated areas, designated by the contractor / manager / landowner. 	PM, C
<ul style="list-style-type: none"> No fires are allowed on work sites. 	PM, C
<ul style="list-style-type: none"> Site specific reaction / evacuation rules must be applied in the case of wild fires. 	C
<ul style="list-style-type: none"> Basic appropriate fire-fighting equipment must be available at each work site; a minimum of five fire beaters and one filled knapsack fire-fighting pump, or alternative suitable equipment. 	PM, C
<ul style="list-style-type: none"> Where fuels and machines are used on site, a 2 kg dry chemical powder fire extinguisher in working condition must be available. 	PM, C
<ul style="list-style-type: none"> Fire Fighting & Extinguishing Equipment inspected and recorded. 	PM
8.2. Fire Protection	
<ul style="list-style-type: none"> The project must be a member of the Fire protection Association (FPA) and attend meetings where applicable 	ECO, PM
<ul style="list-style-type: none"> In FPA areas, the project must be on their communication network. 	ECO, PM

<ul style="list-style-type: none"> Fieldwork may not take place during red days or extreme danger rating days. (Contact Working on Fire office) 	ECO, PM
9. TRAINING	
9.1. Induction	
<ul style="list-style-type: none"> All new workers must receive orientation before starting work. 	PM
9.2. Compulsory functional training	
<ul style="list-style-type: none"> All training, including refresher courses, is compulsory. 	TU, PM
<ul style="list-style-type: none"> All training must be provided to workers and contractors within three months of commencement of work 	TU, PM
<ul style="list-style-type: none"> Project Managers must hold a valid training certificate, on file, for all the training courses required in their project. Alternatively, arrangement must be made with the WfW Programme or suitably qualified units to provide such training 	PM
<ul style="list-style-type: none"> Training must be in line with the latest WFW Training Policy 	TU, PM
<ul style="list-style-type: none"> Area / Project Managers must pass an Environmental Pest Control Course and apply for PCO Registration with the National Dept. Agric - Registrar. 	TU
<ul style="list-style-type: none"> Contractors - Limited Pest Control course. 	TU
<ul style="list-style-type: none"> Herbicide Applicators – WfW Herbicide Applicators course. 	TU
<ul style="list-style-type: none"> Other workers – Herbicide Awareness training. 	TU
<ul style="list-style-type: none"> Chain saw operators - chainsaw handling and maintenance, felling, cross-cutting and de-branching techniques. 	TU

<ul style="list-style-type: none"> Copies of all herbicide training certificates received and Pest Control Licenses must be available with the PM and contractor on-site. 	PM, C
9.3. Training Plan & Profiles	
<ul style="list-style-type: none"> The Training Annual Plan of Operations must be displayed. 	PM
<ul style="list-style-type: none"> The plan must be based on the WFW training matrix and policy. 	TU, PM
9.4. Training Records	
<ul style="list-style-type: none"> All training capture sheets, attendance registers, evaluation forms, and certificates must be filed in the Regional Training Manager’s office or Area office. 	TU, PM
<ul style="list-style-type: none"> All Department of Labour monitoring sheets, correspondence, financial records and training schedules must be filed in the Regional Training Manager’s office or Area office. 	TU
9.5. Accreditation	
<ul style="list-style-type: none"> All training must be aligned to unit standards, where possible. 	TU
<ul style="list-style-type: none"> All training must be provided by accredited training providers, where possible. 	TU
Performance Indicator	<ul style="list-style-type: none"> » Project area is consistently cleared of invasive alien vegetation » Remnants of alien vegetation removed from where they were cleared to make way for the proposed development and rehabilitation of natural vegetation surrounding the development » No indication of further degradation and/or pollution of the areas surrounding the development » No members of staff/ public/ landowners injured
Monitoring	<ul style="list-style-type: none"> » Regular visual inspection of cleared areas for signs of resprouting, alien plant seedling emergence, new alien species invasions » An incident reporting system will be used to record non-conformances to the EMP.

- » Public complaints register must be developed and maintained on site.
- » ECO to monitor all construction areas on a continuous basis until all construction is completed; immediate report backs to site manager.
- » ECO to address any infringements with responsible contractors as soon as these are recorded.

**APPENDIX C:
EROSION MANAGEMENT PLAN**

PRINCIPLES FOR EROSION & STORM WATER MANAGEMENT

1. Purpose

An Erosion Management Plan addresses the management and mitigation of significant impacts relating to soil erosion. The objective of the plan is to provide:

- » A general framework for erosion management, which enables the contractor to identify areas where erosion can be accelerated from their action.
- » An outline of general methods to monitor, manage and rehabilitate erosion in ensuring that all erosion caused by this development is addresses.

2. Legislation and Standards

Soil conservation pertaining to erosion has been a topic within legislation form the 1930's till today in South Africa. Internationally, standards have been set by the International Finance Corporation and the World Bank to address soil erosion in construction and decommissioning of areas. Therefore this document will ensure that the developer meets the South African legislative requirements and the IFC standards with regards to monitoring, managing and rehabilitating soil erosion on the Cookhouse wind energy facility site.

Relevant legislation:

- » Conservation of Agricultural Resources Act No 43 of 1983
- » Environmental Conservation Act No 73 of 1989
- » National Forestry Act No 84 of 1998
- » National Environmental Management Act No 107 of 1998
- » The Department of Water Affairs and Forestry, February 2005. Environmental Best Practice Specifications: Construction Integrated Environmental Management Sub-Series No. IEMS 1.6. Third Edition. Pretoria.

3. Areas with a high soil erodability potential

The following areas are generally associated with high soil erodibility potential:

- » Any areas without vegetation cover
- » Excavated areas
- » Steep areas
- » Areas where the soil has been degraded already
- » Dispersive, duplexed soil areas
- » Areas with fine grained soil material with a low porosity
- » Areas which undergo overland flow of water.
- » Areas close to water
- » Irrigated areas

- » Compacted areas
- » Rivers
- » Drainage lines
- » And any areas where developments cause water flow to accelerate on a soil surface.
- » Coarsely gravelly covered surfaces

4. Precautionary management activities to avoid erosion

In the assessment process the ECO and the contractor must assess all:

- » Infrastructure and equipment placements and function to ensure that the infrastructure or equipment is not causing accelerating soil erosion on the site.
- » Construction activities to ensure that no erosion indicators are forming as a result of the construction activities.

5. Monitoring

7.1. General Erosion

The ECO must assess the site for erosion indicators in the monitoring process, which include:

- » Bare soil
- » Desiccation cracks
- » Terracettes
- » Sheet erosion
- » Rill erosion (small erosion features with the same properties and characteristics as gullies)
- » Hammocking (Soil build-up)
- » Pedestalling (Exposing plant roots)
- » Erosion pavements
- » Gullies
- » Evidence of Dispersive soils

In the assessment process, the ECO and the contractor must assess all:

- » Infrastructure and equipment placements and function to ensure that the infrastructure or equipment is not causing accelerated soil erosion on the site.
- » Construction activities to ensure that no erosion indicators are forming as a result of the construction activities.

If any activities or placement of equipment cause pooling on the site, degrade the vegetation, result in removal of the surface or subsurface soil horizons, create compacted surfaces with steep gradients, or minimise runoff areas, the erosion potential on the site will increase.

If any erosion features are begin forming or are present as a result of the activities mentioned above the ECO must:

- » Assess the situation.
- » Take photographs of the soil degradation.
- » Determine the cause of the soil erosion.
- » Inform and show the relevant contractors the soil degradation.
- » Inform the contractor that rehabilitation must take place and that the contractor is to implement a rehabilitation method statement and management plan.
- » Monitor that the contractor is taking action to stop the erosion and assist them where needed.
- » Report and monitor the progress of the rehabilitation weekly and recorded all the findings in a site diary.
- » All actions with regards to the incidents must be reported on a monthly compliance report which will be submitted to the department.

The contractor/ developer (with the ECO's consultation) must:

- » Select a system to treat the erosion
- » Design the treatment system
- » Implement the system
- » Monitor the area to see if the system functions like it should, if the system fails, the method must be adapt or adjust to ensure the accelerated erosion is controlled.
- » Monitoring must continue until the area has been stabilised

7.2. Stormwater Management

The ECO is responsible to monitor the site and the activities to ensure that no unnatural soil degradation is taking place.

The ECO must assess the site for erosion indicators such as:

- » Bare soil
- » Exposed plant roots, pedestalling
- » Sheet erosion
- » Rill erosion
- » Hammocking
- » Erosion pavements
- » Terracettes
- » Gullies

In the assessment process the ECO and the contractor must assess all:

- » Disturbed watercourse areas by the development: roads, bridges, river crossings, cabling, permanent laydown areas, crane pads and any other remaining hard surfaces.
- » Construction activity limited to specified areas. Stockpiles of aggregate and material will be positioned at least 50m away from drainage lines and wetlands.

If any erosion features are present as a result of the activities mentioned above the ECO must:

- » Assess the situation
- » Take photographs of the soil degradation.
- » Determine the cause of the erosion.
- » Inform and show the relevant contractors the soil degradation.
- » Inform the contractor that rehabilitation must take place and that the contractor is to implement a rehabilitation method statement and management plan.
- » Monitor that the contractor is taking action to stop the erosion and assist them where needed.
- » Monitor the rehabilitation weekly and record the findings in a site diary.
- » All actions with regards to the incidents must be reported on in the monthly compliance monitoring report.

The contractor/ developer must (with the ECO's consultation):

- » Select a system to treat the erosion
- » Design the treatment system
- » Implement the system
- » Monitor the area to ensure that the erosion has been addressed adequately.
- » Monitor the erosion until the area has been stabilised.

6. Rehabilitation

The following erosion control measures and rehabilitation specifications must be implemented to ensure that good environmental practice is conducted and environmental compliance is achieved.

6.1. General Erosion Management

In this section the equipment needed to remediate erosion, the precautionary measures which must be taken to avoid erosion and mitigation requirements for already degraded areas.

6.1.1. Equipment

The civil works contractor may use the following instruments to combat erosion when necessary:

- » Reno mattresses
- » Slope attenuation
- » Hessian material
- » Shade catch nets
- » Gabion baskets
- » Mulching Run-off control (increase the amounts of runoff areas to disperse the water)
- » Silt fences
- » Storm water channels and catch pits
- » Shade / catch nets
- » Soil bindings
- » Geofabrics
- » Hydroseeding and/or re-vegetating
- » Mulching over cleared areas
- » Stone packing
- » Tilling (roughing the surface)

6.1.2. Methods to prevent accelerated erosion

The following practises should be considered and adhered to:

- » Ensure steep slopes are stabilised.
- » Ensure that steep slopes are not stripped of vegetation and left to dry out and become water repellent (which will cause increased runoff and a decreased infiltration rate) increasing the erosion potential.
- » Ensure that all water on site (rain water or water wastage from the construction process) does not result in any surface flow (increase velocity and capacity of water) as a result of the poor drainage systems.
- » Ensure that pooling of water on site is avoided, as the site and the general area consists of dispersive soils, pooling will cause an increase of infiltration on one area, causing the subsurface to begin eroding.
- » Ensure that heavy machinery does not compact those areas which are not intended to be compacted (i.e. areas intended to be managed), as this will result in compacted hydrophobic, water repellent soils which increase the erosion potential of the area. where compaction does occur, the areas should be ripped.
- » Ensure that compacted areas have adequate drainage systems to avoid pooling and surface flow.
- » Prevent the concentration or flow of surface water or stormwater down cut or fill slopes, or along pipeline routes or roads, and ensure measures to prevent erosion are in place prior to construction.
- » Ensure that stormwater and any runoff generated by hard surfaces should be discharged into retention swales or areas with rock rip-rap. These areas should be grassed with indigenous vegetation. These energy dissipation structures should be placed in a manner that surface flows are managed prior to being discharged back into a natural watercourse to support the maintenance of natural

base flows within the ecological systems and prevent erosion, i.e. hydrological regime (water quantity and quality) is maintained.

- » Ensure siltation and sedimentation through the use of the erosion equipment mentioned structures.
- » Ensure that all stormwater control features have soft engineered areas that attenuate flows, allowing for water to percolate into the local ground watertable in low quantities (to reduce runoff but prevent subsurface erosion).
- » Minimise and restrict site clearing to areas required for construction purposes only and restrict disturbance to adjacent undisturbed natural vegetation.
- » Ensure that vegetation clearing is conducted in parallel with the construction progress across the site to minimise erosion and/or run-off.
- » Ensure that large tracts of bare soil which would cause dust pollution in high winds, or have high erosion susceptibility and increase sedimentation in the lower portions of the catchment are controlled through temporary surface covering.
- » Ensure no diversion of water flows in catchment occurs.
- » Ensure that dust control measures are implemented, but prevent over-wetting/saturating the area (to cause pooling) and run-off (that may cause erosion and sedimentation).
- » Watercourse (stream) crossings should not trap any run-off, thereby creating inundated areas, but allow for free flowing watercourses.

6.1.3. Mitigation for previously degraded areas

Previously degraded areas could pose a threat to construction activities in the area and must therefore be stabilised, then remediated and rehabilitated through:

- » Protecting, stabilise and isolate the degraded areas to ensure no further damage is caused by erosion due to construction activities.
- » Increase the drainage in the area but avoid pooling.
- » Prevent increasing sedimentation in areas that have been choked by soils from degraded areas.
- » Once construction has been completed, a method statement must be drafted for the rehabilitation of the previously degraded areas, using equipment mentioned above and implemented.
- » Stabilisation of steep slopes must be undertaken.
- » Ensure that bare soil is covered and hydro seeded to reduce topsoil loss.

6.2. Methodologies

The following erosion control measures and rehabilitation specifications may be required to be implemented to ensure that good environmental practice is conducted and environmental compliance is achieved.

- » Topsoil covered with a geotextile or hessian material and a grass seed mixture (see Rehabilitation Specifications).

- » Logging or stepping following the contours of the slope, to reduce surface runoff.
- » Earth or rock-pack cut-off berms.
- » Packed branches to roughen the surface and promote infiltration.
- » Benches (sand bags).
- » Stabilisation of near vertical slopes (1:1 – 1:2), if created during construction, will be required to utilise hard structures that have a natural look. The following methods may be considered:
 - Gabions (preferred method with geotextile material).
 - Retaining walls.
 - Stone pitching.
- » The slopes of all stream diversions must be protected. The following methods may be considered:
 - Reno mattresses (preferred method), ensure that the reno mattresses are buried deep into the subsurface, to avoid undercutting from the water.
 - Coarse rock (undersize rip-rap)
 - Sandbags.
 - Stone packing with geotextile
- » Where feasible use rubber dams as stream diversions when establishing water course crossings. Although (and considering that these are non-perennial watercourses) the recommendation is to construct watercourse crossings during dry periods (or no flow periods), where possible.
- » Any concentration of natural water flow caused by road works or hardstands areas will be treated as follows:
 - if water flow is sub-critical, nothing is required
 - if water flow is supercritical, the outlets will be provided with protection (either gabions or stone pitching – depending on the flows) to release water subcritical back into the watercourse at a low velocity.

6.3. Engineering Specifications

A detailed Stormwater Management Plan describing and illustrating the proposed stormwater control measures must be prepared by the Civil Engineers and this includes erosion control.

Requirements for project design:

- » Erosion control measures to be implemented before and during the construction period, including the final stormwater control measures (post construction).
- » The location, area/extent (m²/ha) and specifications of all temporary and permanent water management structures or stabilisation methods.
- » A resident Engineer to be responsible for ensuring implementation of the erosion control measures on site during the construction period.
- » The Developer holds ultimate responsibility for remedial action in the event that the approved stormwater plan is not correctly or appropriately implemented and damage to the environment is caused.

- » Concrete lined drains placed adjacent to road to transfer the water to the existing water courses.
- » Frequent gravel drains hydroseeded placed on permanent roadway edges.
- » At the point where stormwater is discharged, energy dissipaters to be constructed to reduce the flow rate of run-off.
- » All cut and fill banks will be seeded with an approved seed mix (as per the rehabilitation specifications) to ensure bank stabilisation and the elimination of potential erosion. Reno mattresses may be used to ensure that the area remains stable.

6.4. Rehabilitation Specifications

- » Employ a Horticultural Landscape Contractor to fulfil the rehabilitation of disturbed areas post-construction.
- » A detailed Rehabilitation Plan describing and illustrating the proposed rehabilitation activities on site must be prepared i.e. areas of top soiling, seeding and replanting of vegetation; species mix; requirements for fertilisation; seed sowing rates; watering etc. (i.e. bill of quantities).
- » The following document should be consulted for further support with respect to information regarding rehabilitation, namely: The Department of Water Affairs and Forestry, February 2005. Environmental Best Practice Specifications: Construction Integrated Environmental Management Sub-Series No. IEMS 1.6. Third Edition. Pretoria.
- » These specifications may be modified by the Horticultural Landscape Contractor on consideration of site conditions.

6.5. Post- and during construction rehabilitation activities

- » Correct and appropriate stockpile management of topsoil will be required during the construction phase.
- » Rehabilitation of disturbed areas will be implemented as these areas become available for rehabilitation.
- » Disturbed areas will include, for example: construction camp site, areas where underground cabling has been layed/buried, roadsides of new access roads.

7. Rehabilitation steps to mitigate the eroded area

- » Stockpiled topsoil must be spread over disturbed areas (150 – 200mm thick) just prior to planting/seeding.
- » Rip and scarify along the contours of the newly spread topsoil prior to watering and seeding.
- » Organic fertilizers or compost shall be used if site conditions require it and can be applied as part of hydro-seeding applications.
- » Seed should be sown into weed-free topsoil that has been stockpiled (i.e. original topsoil from the site).

- » Indigenous plants (e.g. grass species such as *Cynodon dactylon*, *Eragrostis curvula*) shall be used to rehabilitate disturbed areas.
- » Applying the seed through hydromulching (hydro-seeding) is advantageous (or organic mulching after seeding).
- » Watering is essential and rehabilitation should ideally occur during the wet season.
- » The topsoil in the area is vulnerable to erosion therefore the hydro-seeded surfaces must be covered with a shade cloth material or natural fibre (hessian material) to reduce the loss of soil while the plants establish.

7.1. 'Watering' to avoid erosion

- » Movement of livestock in newly rehabilitated areas must be restricted, where possible, while taking into consideration drinking areas/paths.
- » Watering the rehabilitated areas should be undertaken in the wet/rainy season essential but if this is not possible, an initial watering period (supplemental irrigation) will be required to ensure plant establishment (germination and established growth).
- » Generous watering during the first two weeks, or until the seeds have germinated, is required (unless adequate rainfall occurs) i.e. seed beds will need to be kept moist for germination to occur.
- » For grass to establish (once germination has occurred), rainfall or irrigation is needed at regular intervals, ideally every few days and possibly every day if weather conditions require it.
- » During dry periods, with no rainfall, 100 litres per m² (or 100mm of rain) over a month or more, may be necessary to establish plants capable of surviving dry weather (or otherwise specified by the Horticultural Landscape Contractor).

7.2. Seeding

The developer should make use of an appropriate mix of grass species for rehabilitation to be determined in consultation with a suitably qualified ecologist) and they must be mixed for sowing either in summer or in winter. Grass species application (Rutherford, 2006) is at the rate specified as kg/ha.

7.3. Steep slopes

- » Areas that have a steep gradient and require seeding for rehabilitation purposes should be adequately protected against potential run-off erosion e.g. with coir geotextile netting or other appropriate methodology.
- » Provision for wind should also be made on these slopes to ensure the fine grained soil is not removed.

7.4. Maintenance and duration

- » Rehabilitation will occur during construction, as areas for plant rehabilitation become available.
- » The rehabilitation period post construction is estimated to be over a period of 6 (minimum) to 12 months (maximum), or a time period specified by the Horticultural Landscape Contractor, particularly if planting of trees and shrubs occurs.
- » The rehabilitation phase (including post seeding maintenance) should be at least 6 months (depending on time of seeding and rainfall) to ensure establishment of plants with a minimum 80% cover achieved (excluding alien plant species).
- » If the plants have not established and the 80% is not achieved within the specified maintenance period, maintenance of these areas shall continue until at least 80% cover is achieved (excluding alien plant species).
- » Additional seeding may be necessary to achieve 80% cover.
- » Any plants that die during the maintenance period must be replaced.
- » Succession of natural plant species should be encouraged.

8. Conclusion

The Erosion Management Plan is a document to assist the contractor, the Developer and the ECO with guidelines on how to manage erosion. The implementation of management measures is not only good practice to ensure minimisation of degradation, but also necessary to ensure comply with legislative requirements. This document forms part of the EMP, and is required to be considered and adhered to during the design, construction, operation and decommissioning phases of the project.

9. References

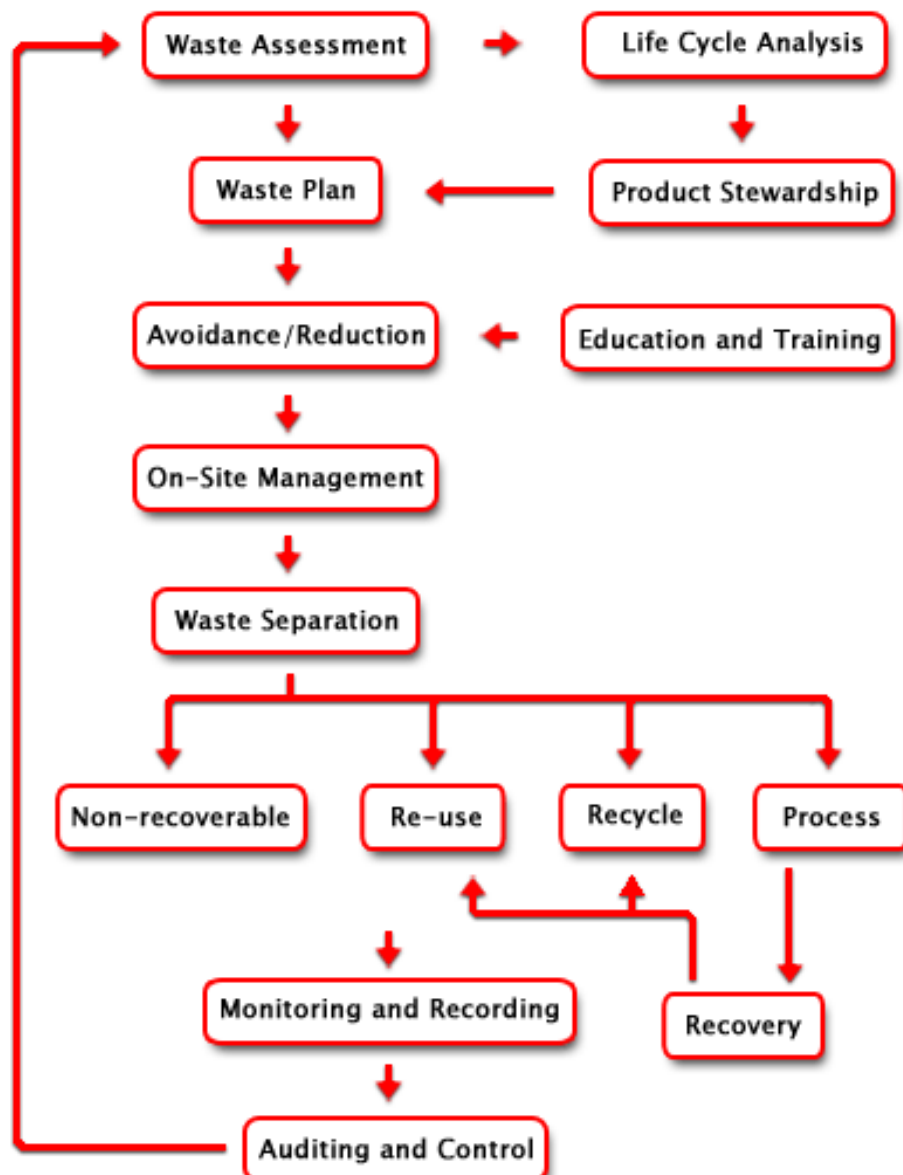
- Department of Environmental Affairs. (1983). *Conservation of Agricultural Resources Act 43 of 1983*. Pretoria: Department of Environmental Affairs.
- Coetzee, K. (2005). *Caring for Natural Rangelands*. Scottsville: University of KwaZulu-Natal Press.
- Commission, F. R. (2009, March 10). *Forestry Commission*. Retrieved August Tuesday, 2012, from Forestry Commission: Forest Research : www.forestry.gov.uk
- Tongway, D. J., & Ludwig, J. A. (2004). *Heterogeneity in arid and semi arid lands*. Queensland: Sustainable Ecosystems.
- van der Linde, M., & Feris, L. (2010). *Compendium of South African Legislation*. Pretoria: Pretoria University Press.

**APPENDIX D:
GUIDELINES FOR INTEGRATED MANAGEMENT OF
CONSTRUCTION WASTE**

GUIDELINE FOR INTEGRATED MANAGEMENT OF CONSTRUCTION WASTE

Waste is broadly defined by the Department of Water Affairs in 1994 as: 'an undesirable or superfluous by-product, emission, residue or remainder of any process or activity'. An integrated approach to waste management on site is needed. Such an approach is illustrated in the figure below.

The Integrated Waste Management Approach to Waste



Source: <http://www.enviroserv.co.za/pages/content.asp?SectionId=496>

1. Waste Assessment

A detailed waste assessment is necessary to understand the waste types and volumes being produced. In order to achieve this, construction practices must be measured and analysed.

2. Waste Plan

A waste plan must be developed to provide appropriate solutions for managing the entire waste stream on site. The objective of the plan should be to reduce the volumes of waste to disposal and thereby to reduce the cost of management of the waste stream without compromising environmental standards. The plan should include recovery, re-use and recycle recommendations.

Construction Waste Management is the practice of reducing the actual waste that goes to the landfill site. Waste reduction is best met by recycling, and construction wastes offer several opportunities in this regard. In fact, 80% of the wastes found in construction waste piles are recyclable in some form or another. Wood, concrete, bricks, metals, glass and even paint offer several options for recycling.

There are three basic steps for construction waste management, i.e. Reduce, Reuse, and Recycle. **Reduce** is the prevention of the waste from arising and optimising material usage. Waste avoidance and waste reduction can be achieved through improved education and training - by improving efficiencies and by making staff environmentally aware.

Reuse is using existing materials instead of throwing these away. Reusing does not mean that it needs to be reused on the same construction site. Selling or donating waste materials to a third party is one option of construction waste management.

Recycle is somewhat limited since it only allows for those items that can be used on-site. The most important step for recycling of construction waste is on-site separation. Initially, this will take additional effort and training of construction personnel. Targets should be set for the levels of recycling. Once separation habits are established, on-site separation can be done at little or no additional cost.

3. What to Recycle

Before recycling construction waste, identify who will accept it. This is important in designating type of waste to separate, and in making arrangements for drop-off or delivery of materials. Materials that can be recycled include:

- » Cardboard and Paper
- » Wood

- » Metals
- » Plastics
- » Glass
- » Paints, Stains, Solvents and Sealants
- » Oil

4. Materials Separation

Successful recycling requires good clean uniform collections of single waste types. This is most effectively achieved by separating the waste streams close to source rather than at the landfill site. Containers for material recycling must be set up on site and clearly labelled. Construction personnel must be trained in material sorting policy, and bins must be monitored periodically to prevent waste mixing as a result of construction employees throwing rubbish into the bins.

Some materials will require bins or storage that protect these from rain. Other bins may be locked to prevent tampering.

5. Recycling and Waste Minimisation Guidelines

- » *Wood*
 - * Optimise building dimensions to correspond to standard wood dimensions in order to reduce the need for cutting.
 - * Store wood on level blocking under cover to minimize warping, twisting and waste.
- » *Metals*
 - * During construction, separate metals for recycling, including copper piping, wire, aluminium, iron and steel, nails and fasteners, galvanized roofing. It is critical to keep lead out of landfills because it could leach into groundwater.
- » *Cardboard and Paper*
 - * Avoid excessively packaged materials and supplies. However, be sure packaging is adequate to prevent damage and waste.
 - * As far as possible, use recyclable packaging.
 - * Separate cardboard waste, bundle, and store in a dry place.
 - * Minimise the number of blueprints and reproductions necessary during the design and construction process.
- » *Plastic*
 - * Avoid excessively packaged materials and supplies. However, be sure packaging is adequate to prevent damage and waste.
 - * As far as possible, use recyclable packaging.

Since more than 60 different types of plastic resins exist, the Plastics Federation of South Africa has adopted a voluntary number coding system for each category of plastics to aid in their sorting by material type for recycling (Bruyns et al, 2002). The most common resin types are itemised in Table 1.

Table 1: Identification System for Plastic

Id Number	Plastic Resin Type
1	PET (polyethylene terephthalate)
2	HDPE (high-density polyethylene)
3	PVC (polyvinyl chloride) or V (vinyl)
4	LDPE (low-density polyethylene)
5	PP (polypropylene)
6	PS (polystyrene)
7	Other (laminates, etc.)

» *Paints, Stains, Solvents and Sealants*

* Unused materials should be taken to a hazardous waste collection facility.

6. On-site Management

Good supervision of the waste management programme on site is critical to success. Management of the entire on-site program is critical to ensure smooth operations.

7. Auditing and Control

The success of the waste plan is determined by measuring criteria such as waste volumes, cost recovery from recycling, cost of disposal. Recorded data can indicate the effect of training and education, or the need for education. It will provide trends and benchmarks for setting goals and standards. It will provide clear evidence of the success or otherwise of the plan. Finally, good record keeping and control, becomes a continuous waste assessment process, allowing the waste plan to be improved and adjusted as required.

8. Useful contacts:

<http://www.transpaco.co.za/page5.htm>

Transpaco, a manufacturing and distribution company operating extensively in the plastics and packaging industries, conducts plastic reclamation and recycling.

<http://www.jclenterprises.co.za/>

JCL Enterprises for plastic sales of quality recycled plastic materials as well as the recycling of plastic.

<http://www.rosefoundation.org.za/>

The Rose Foundation specialises in the collection and recycling of used motor (engine) oil.

Information Sources:

<http://www.greenbuilder.com/sourcebook/ConstructionWaste.html#Guidelines>

<http://www.enviroserv.co.za/pages/Content.asp?SectionID=587>

<http://www.enviroserv.co.za/pages/content.asp?SectionId=496>

Programme for the Implementation of the National Waste Management Strategy. DEAT, May 2000

Residential Construction Waste Management Demonstration and Evaluation. Prepared for U.S. Environmental Protection Agency by NAHB Research Center, May 2, 1995

