
**PROPOSED PROJECT BLUE SOLAR ENERGY
FACILITY NORTH OF KLEINSEE,
NORTHERN CAPE PROVINCE**

DEA Ref No: 14/12/16/3/3/2/316

**DRAFT ENVIRONMENTAL MANAGEMENT
PROGRAMME**

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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.

Drainage: A drainage line is a lower category or order of watercourse that does not have a clearly defined bed or bank. It carries water only during or immediately after periods of heavy rainfall i.e. non-perennial, and riparian vegetation may or may not be present

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

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

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

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

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

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

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

Environmental management programme: An operational plan that organises and co-ordinates mitigation, rehabilitation and monitoring measures in order to guide the implementation of a proposal and its on-going maintenance after implementation.

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.

Perennial and non-perennial: Perennial systems contain flow or standing water for all or a large proportion of any given year, while non-perennial systems are episodic or ephemeral and thus contains flows for short periods, such as a few hours or days in the case of drainage lines.

Riparian: the area of land adjacent to a stream or river that is influenced by stream-induced or related processes. Riparian areas which are saturated or flooded for prolonged periods would be considered wetlands and could be described as riparian wetlands. However, some riparian areas are not wetlands (e.g. an area where alluvium is periodically deposited by a stream during floods but which is well drained).

Photovoltaic effect: Electricity can be generated using photovoltaic solar panels which are comprised of individual photovoltaic cells that absorb solar energy to directly 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.

Watercourse: as per the National Water Act means -

- (a) a river or spring;
- (b) a natural channel in which water flows regularly or intermittently;
- (c) a wetland, lake or dam into which, or from which, water flows; and
- (d) any collection of water which the Minister may, by notice in the Gazette, declare to be a watercourse, and a reference to a watercourse includes, where relevant, its bed and banks

Wetlands: land which is transitional between terrestrial and aquatic systems where the water table is usually at or near the surface, or the land is periodically covered with shallow water, and which under normal circumstances supports or would support vegetation typically adapted to life in saturated soil (Water Act 36 of 1998); land where an excess of water is the dominant factor determining the nature of the soil development and the types of plants and animals living at the soil surface (Cowardin et al., 1979).

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PROJECT DETAILS

CHAPTER 1

WWK Development (Pty) Ltd has identified a site north of the town of Kleinsee within De Beers mining area in the Nama Khoi Local Municipality Northern Cape Province for the establishment of a photovoltaic (PV) solar energy facility. The solar energy facility is proposed to accommodate PV panels appropriately spaced over an extent of approximately 130 hectares for the purpose of electricity generation. The total generating capacity of the proposed facility will be up to 65 MW (to be developed in two phases of 20MW and 45MW respectively). This solar component will be referred to as the **Project Blue Solar Energy Facility** (refer to Figure 1.1).

The initial site for development of the Project Blue Renewable Energy Facility was identified in early 2009 as an area of interest for wind development by WWK Development. In early 2012, WWK Development decided to add a solar component to the proposed project as a result of, inter alia,

- » the potential solar resource (estimated from satellite derived mesocale data);
- » previous disturbance of local landscape from mining activities;
- » potential size of the site;
- » proximity to the proposed wind energy facility; and
- » the proximity of high voltage electrical grid lines (at Gromis Substation).

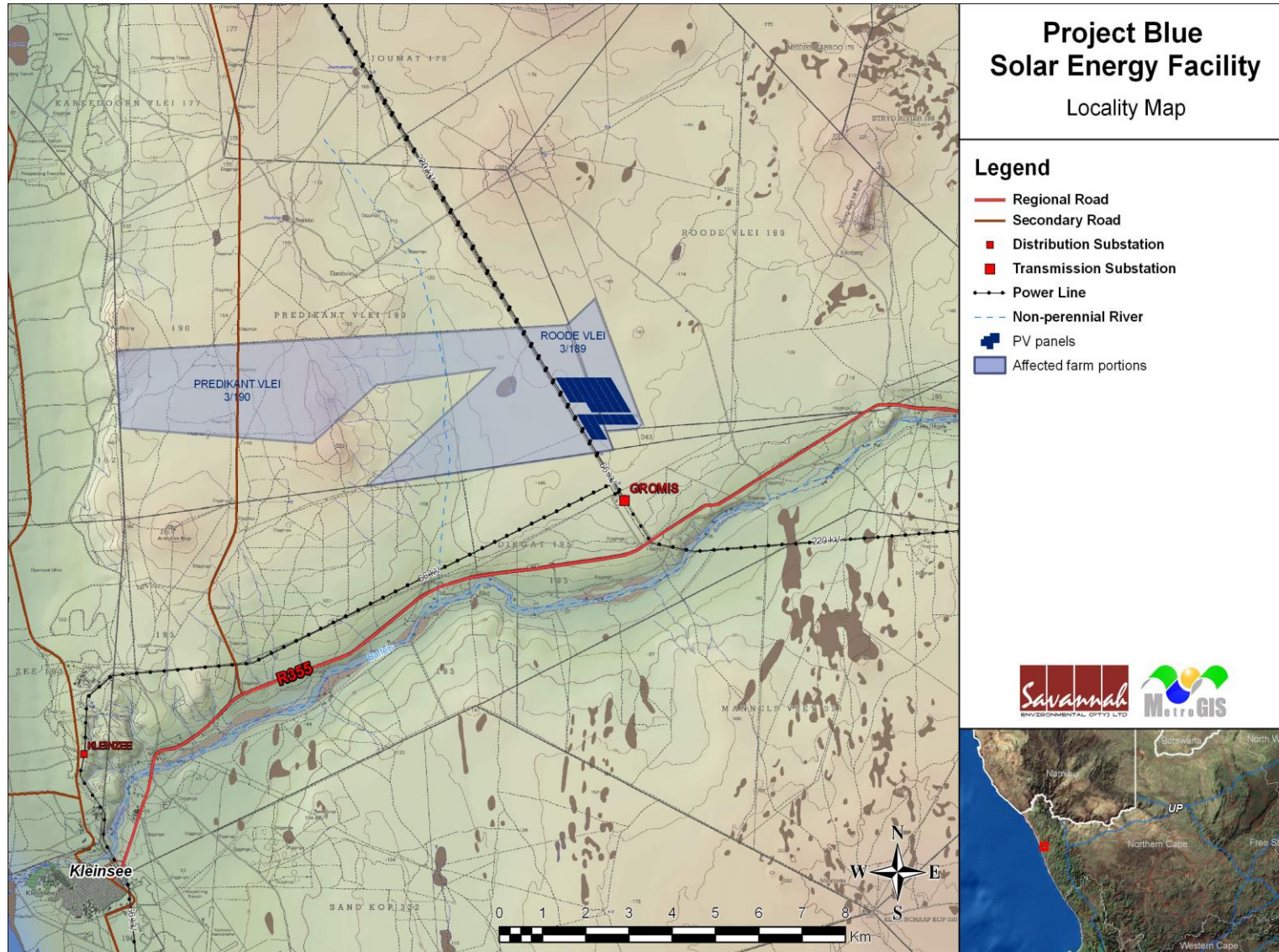
Initial site visits and early discussions were held with the majority landowner, i.e. De Beers, which subsequently engaged in a competitive process to award the land to independent power producers (IPPs). WWK Development was selected to develop in this area through this process.

The proposed study site falls within the Nama Khoi Local Municipality on Portion 03 of the Farm Predikant Vlei 190, Portion 03 of the Farm Roode Vlei 189 and Portion 04 of the Farm Dikgat 195 (refer to Figure 1.2). The proposed facility is envisaged to have a maximum generating capacity of up to 65 MW (to be developed in a phased approach) to be achieved through several arrays of PV panels and the following associated infrastructure:

- » Arrays of photovoltaic (PV) panels.
- » Mounting structures for the solar panels to be rammed steel piles or piles with pre-manufactured concrete footings.
- » Cabling between the structures, to be lain underground where practical.
- » Central inverter/transformer stations to collect all energy generated from the PV panels. The inverter's role is to convert direct current (DC) electricity to alternating current (AC) electricity at grid frequency.

- » An on-site substation (150m x 150m) and power line (2km) to evacuate the power from the facility into the Eskom Gromis Substation grid via the existing Gromis Nama 1 (220 kV)
- » Internal access roads (4-6 m wide roads).
- » Associated buildings including a workshop area for maintenance, storage, and control facility with basic services such as water and electricity

The proposed development requires an area of approximately 130 ha, and is to be located within a broader site of approximately 360 ha. Therefore the facility can be appropriately placed within the broader site such that any identified environmental sensitivities can be avoided.



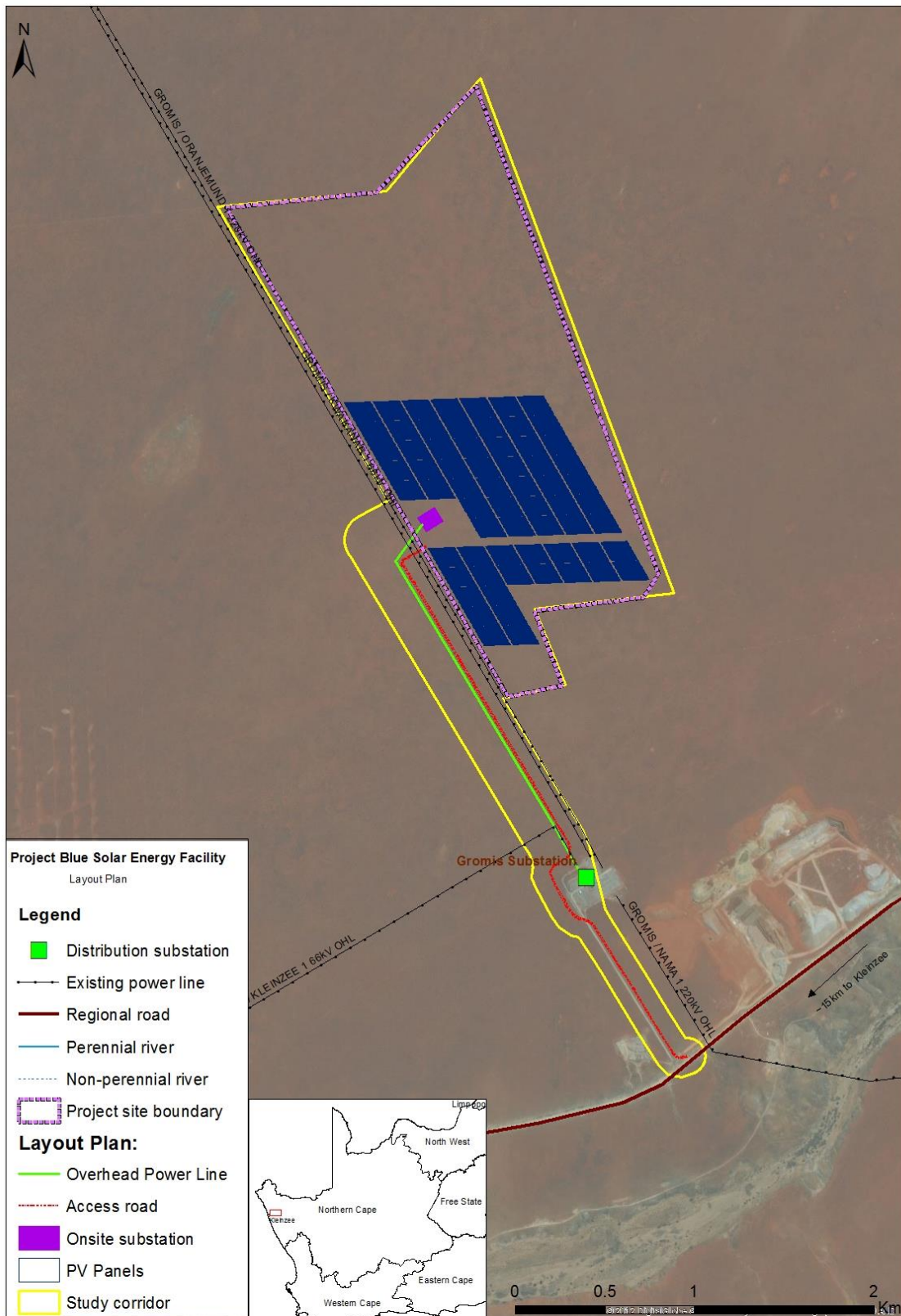


Figure 1.2: Layout map showing the location of PV facility and associated infrastructure within the proposed Project Blue Solar Energy Facility

1.1. Activities and Components associated with the Solar Energy Facility

In order to construct the solar energy facility and its associated infrastructure, a series of activities will need to be undertaken during the design, pre-construction, construction, operation, and decommissioning phases which are discussed in more detail below.

1.1.1 Design and Pre-Construction Phase

Conduct Surveys

Prior to initiating construction, a number of surveys will be required including, but not limited to confirmation of the micro-siting footprint (i.e. the precise location of the PV panels, substation and the plant's associated infrastructure) and a geotechnical survey. Geotechnical surveys are executed by geotechnical engineers and geologists to acquire information regarding the physical characteristics of soil and rocks underlying a proposed site. The purpose is to design earthworks and foundations for structures and to execute earthwork repairs necessitated due to changes in the subsurface environment.

A power line servitude survey will also be conducted. If necessary, a walk through survey will be undertaken for ecological/heritage resources prior to construction.

1.1.2 Construction Phase

The construction of the facility will be undertaken in a phased approach, i.e. the total 65MW will be developed in two different phases. The construction phase is expected to extend over a period of 8-10 months and create between 150-200 employment opportunities at peak construction. It is anticipated that approximately 25 % (50) will be available to skilled personnel (engineers, technicians, management and supervisory), ~ 15 % (30) to semi-skilled personnel (drivers, equipment operators), and ~ 60% (120) to low skilled personnel (construction labourers, security staff).

Members from the local community are likely to be in a position to qualify for the majority of the low skilled and some of the semi-skilled employment opportunities. The majority of these employment opportunities are also likely to accrue to Historically Disadvantaged (HD) members from the local community. Given the high unemployment levels and limited job opportunities in the area this will represent a significant social benefit. The remainder of the semi-skilled and majority of the skilled employment opportunities are likely to be associated with the contactors appointed to construct the solar energy facility and associated infrastructure. In terms of accessibility the majority of the construction workers

from outside the area are likely to be accommodated in Kleinsee and transported to and from the site.

The construction phase will entail a series of activities including:

Conduct Surveys

Prior to initiating construction, a number of surveys will be required including, but not limited to confirmation of the micro-siting footprint (i.e. the precise location of the PV panels and the plant's associated infrastructure) and a geotechnical survey. Geotechnical surveys are executed by geotechnical engineers and geologists to acquire information regarding the physical characteristics of soil and rocks underlying a proposed site. The purpose is to design earthworks and foundations for structures and to execute earthwork repairs necessitated due to changes in the subsurface environment.

A power line servitude survey will also be conducted for the proposed 220kV power line once the placement of the towers for the power line has been finalised. If necessary, a walk through survey will be undertaken for ecological, archaeology and heritage resources which may necessitate certain towers to be moved to avoid on-the-ground sensitivities.

Establishment of Access Roads

The route proposed for the transport of PV panels etc. is not known at this stage, but the N7 - R355 seems the most probable route.

The proposed site is essentially only accessible from the N7 (via Garies or Springbok). Access/haul roads to the site as well as internal access roads within the site are required to be established prior to the commencement of construction. Access to the site is likely to be from the gravel roads in the study area. As far as possible, existing access roads would be utilised, and upgraded where required. Within the site itself, access will be required between the PV panels for construction purposes (and later limited access for maintenance). Special haul roads may need to be constructed to and within the site to accommodate abnormally loaded vehicle access and circulation. The internal service road alignment will be informed by the final micro-siting/positioning of the infrastructure.

Internal access roads will be required to access the individual components within the facility during construction and operation. The extent of earthworks and compaction required in the upgrade or construction of the access roads will be established through the detailed geotechnical study which will be undertaken as part of the design phase.

Undertake Site Preparation

Site preparation activities will include clearance of vegetation at the footprint of each support structure. These activities will require the stripping of topsoil which will need to be stockpiled, backfilled and/or spread on site. If the terrain is undulating, then the ground may have to level to one slope, if the land is not flat enough. Rocks may also be removed as well as trees that may be obstacles.

Transport of Components and Construction Equipment to Site

The components for the proposed facility will be transported to site, in sections, by road. Some of the substation components may be defined as abnormal loads in terms of the Road Traffic Act (Act No. 29 of 1989)¹ by virtue of the dimensional limitations (i.e. length and weight). The typical civil engineering construction equipment will need to be brought to the site (e.g. excavators, trucks, graders, compaction equipment, cement trucks, etc.), as well as the components required for the establishment of the substation and power line.

Establishment of Construction Equipment Camps

Once the required equipment has been transported to site, a dedicated construction equipment camp will need to be established. The purpose of this camp is to confine activities and storage of equipment to one designated area to limit the potential ecological impacts associated with this phase of the project. The laydown area(s) will be used for assembly purposes and the general placement/storage of construction equipment. The storage of fuel for the on-site construction vehicles and equipment will need to be secured in a temporary bunded facility so to prevent the possibility of leakages and soil contamination.

Establishment of the PV Panels

The PV panels will be mounted via steel structures which will be attached to uprights which are stabilised by concrete foundations where necessary. The foundation holes will be mechanically excavated to a depth of approximately 100 - 150 cm. The concrete foundations where necessary will be poured and then be left for up to a week to cure. Aggregate and cement to be transported from the closest centre to the development. The installation of the underground cables will require the excavation of trenches of approximately 40 cm - 100 cm deep within which they can then be laid.

¹ A permit will be required for the transportation of these abnormal loads on public roads.

Establishment of Ancillary Infrastructure

Ancillary infrastructure includes invertors, a single substation, an overhead power line (up to 220kV) to the Gromis substation (The Gromis substation is a distance of approximately 1.6km from the proposed PV facility), and a workshop for maintenance and storage.

The establishment of these facilities/buildings will require the clearing of vegetation and levelling of the development site and the excavation of foundations prior to construction. A laydown area for building materials and equipment associated with these buildings will also be required.

Construct on-site substation

An on-site substation of approximately 150 m x 150 m will be required to be established on the site. The construction of the substation would include the construction of the foundations, erection and installation of equipment (including the transformer) and connection of the necessary conductors.

Once micro-siting/positioning of the PV panels has been finalised, the position of the main substation will be chosen to optimise cable lengths and associated losses. Due to the prevailing corrosive environmental conditions an indoor substation is preferred, but a small switchyard (approx. 50 x 80m) containing the 220kV step-up transformers and overhead line feeder switchgear may be required. The construction of the substation would require a survey of the site; site clearing and levelling and construction of an access road to substation site (where required); construction of substation terrace and foundations; substation building, assembly, erection and installation of equipment (including transformers); connection of conductors to equipment; and rehabilitation of any disturbed areas and protection of erosion sensitive areas.

Undertake Site Rehabilitation

As construction is completed in an area, and as all construction equipment is removed from the site, the site must be rehabilitated where practical and reasonable. On full commissioning of the facility, any access points to the site which are not required during the operation phase will be closed and prepared for rehabilitation.

1.1.3 Operational Phase

The proposed operational phase is expected to run for a period of approximately 25 - 30 years with plant maintenance. It is anticipated that during this time a full

time security, maintenance, supervision and monitoring teams will be required on site. Maintenance activities will include *inter alia*, replacement and cleaning of the panels (using pressurised air and water). The photovoltaic plant will be operational during daylight hours only. However, it will not be operational under circumstances of mechanical breakdown, extreme weather conditions or maintenance activities. No energy storage mechanisms (i.e. batteries) which would allow for continued generation at night or on cloudy days are proposed.

1.1.4 Decommissioning Phase

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 would be disassembled and replaced with more appropriate 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.

Site Preparation

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

Disassemble and Remove Existing Components

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.

1.2 Findings of the Environmental Impact Assessment

From the assessment of potential impacts undertaken within this EIA, it is concluded that there are no environmental fatal flaws associated with the site proposed for Project Blue solar energy facility. Potential environmental impacts and some areas of high sensitivity were however identified (refer to **Figure 1.3**). In summary, the most significant environmental impacts associated with Project Blue solar energy facility, as identified through the EIA, include:

- » Impacts on ecology on the site.
- » Impacts on the local soils, land capability and agricultural potential of the site.
- » Visual impacts mainly due to the solar panels and partly due to other associated infrastructure (power line, access road etc.).
- » Social and economic impacts.
- » Cumulative impacts.

» **Impacts on Ecology**

According to Mucina & Rutherford (2006) the site falls almost entirely within the Namaqualand Strandveld vegetation unit. This vegetation type occupies the valleys and flat areas between the granitic rocky hills of the Namaqualand escarpment from Steinkopf in the north to Bitterfontein in the south. Namaqualand Strandveld consisting of open, low to mid-high succulent shrubland on red, sandy soil. Perennial geophytes such as *Boophane disticha* (gifbol). The ecological sensitivity assessment identified those parts of the site that have low conservation value. From an ecology perspective, it is not expected that the development will compromise the survival of any specific flora or terrestrial vertebrate species on the study area or beyond if mitigation measures are fully implemented. The most significant impacts are expected to be on ecosystem health and functionality, which should remain relatively intact if all mitigation recommendations are implemented.

» **Impact on Soils, Land Capability and Agricultural Potential**

The soils are mainly eutrophic and lime containing red deep sandy soils with limited occurrences of yellow brown soils are prone to wind erosion due to the sandy texture of the soil. It is, therefore, important that there should be strict adherence to the Environmental Management Programme and good soil management measures regarding the management of stormwater runoff and water erosion control should be implemented during all phases of the project. With the implementation of good soil management measures the impact of the PV Facility on soils can be managed to an acceptable level, without significant erosion issues during the lifespan of the facility.

The study area has limited agricultural potential. The significance of agricultural impacts is influenced by the fact that the site has extremely limited agricultural potential. The site is used only for grazing of sheep and goat. No agriculturally sensitive areas occur within the proposed Project Blue Solar Energy Facility footprint. The major limitations to agriculture are the aridity and lack of access to water, as well as the very sandy soils with limited water and nutrient holding capacity, and in some places limited soil depth. The development will have **low to medium** negative impacts on agricultural resources and productivity. The conclusion of this assessment is that from an agricultural impact perspective the development can proceed as proposed, subject to the recommended mitigation measures provided being implemented.

» **Heritage Impacts and Paleontological Resources**

There were no heritage sensitive areas identified on the Project Blue Solar Energy Facility.

The impact of the project on **heritage resource** is rated as **low significance**. However, a preconstruction walk-through survey by an archaeologist is recommended to be undertaken for the PV facility and associated infrastructure. Should substantial archaeological or paleontological (fossils) remains or graves be exposed during construction, SAHRA should be alerted as soon as possible such that appropriate action (e.g. recording, sampling or collection) can be taken by a professional archaeologist or palaeontologist. It is recommended that a close examination of all excavations be made while they are occurring during construction within the Gordonian Formation sands.

» **Visual Impacts**

The visual surroundings of the proposed Project Blue solar Energy site, especially within a 3km radius, will be visually impacted upon for the anticipated operational lifespan of the facility (i.e. 20 - 30 years). There are no major urban developments near (within 12km of) the proposed Project Blue Solar Energy Facility development site, but additional viewer incidence (and expected negative viewer perception) will be concentrated within the homesteads and farm residences within the study area at 12km, located primarily along the Buffels River.

During the decommissioning or post-closure phase of the project, all of the infrastructure will be removed, recycled or re-used off-site. The residual visual impacts of the site are expected to include scarring of the landscape in the areas affected by infrastructure. With the implementation of appropriate management measures such as rehabilitation of disturbed areas and planting of vegetation and visual screening methods at receptors / key viewpoints, this scarring and visual impact could be reduced and removed in the long-term.

The anticipated visual impacts identified through the EIA process (post mitigation measures) are on average expected to be of low to moderate significance. The Project Blue Solar development is therefore not considered to be fatally flawed from a visual perspective.

» **Social and Economic Impacts**

The proposed project could have negative and positive **social and economic impacts** of **low (negative) and high (positive) significance** for post mitigation and enhancement respectively. Project Blue Solar Energy facility will provide opportunities for employment and skills development in the local area during both the construction and operational phases. Another potential spin-off from the development is the stimulation of the local economy, including development of industries specifically to provide services and goods for solar facilities, and general retail businesses and accommodation. Potential negative impacts include the threats to public safety from construction and traffic

activity, potential increased crime and health risks such as HIV/Aids particularly during construction and if people move into the area hoping to secure jobs. Social dissent is also possible if people perceive that recruitment processes are unfair and biased. Other impacts on the social environment include impacts associated with traffic and infrastructure (such as local roads). It is important that potential negative effects are managed as per the recommended mitigation measures to prevent these from developing into unacceptable cumulative impacts. Positive impacts of job creation and stimulation of the local economy can be progressed and cumulatively contribute to a desired outcome if enhancements measures (as contained in the socio-economic specialist study and draft EMP) are implemented.

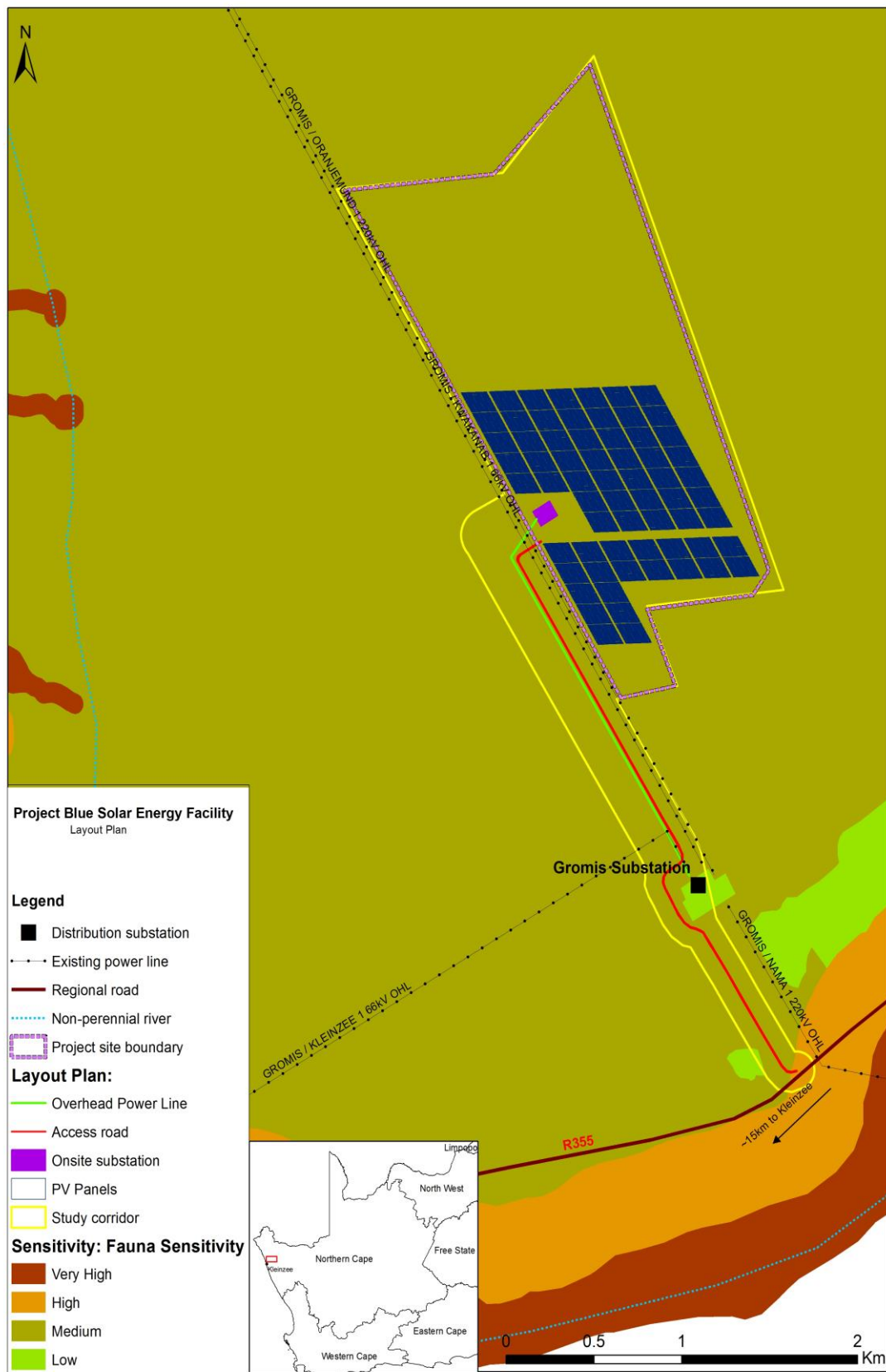


Figure 1.3: Environmental Sensitivity map for the proposed Project Blue Solar Energy Facility

PURPOSE AND OBJECTIVES OF THE EMPr

CHAPTER 2

An Environmental Management Programme (EMPr) 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.”² The objective of this EMPr is to provide consistent information and guidance for implementing the management and monitoring measures established in the permitting process and help achieve environmental policy goals. The purpose of an EMPr is to ensure continuous improvement of environmental performance, reducing negative impacts and enhancing positive effects during the construction and operation of the facility. An effective EMPr is concerned with both the immediate outcome as well as the long-term impacts of the project.

The EMPr 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 Environmental Management Programme has been compiled for the design, construction and operation of the 65MW Project Blue Solar Energy Facility. This EMPr 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 EMPr has been compiled in accordance with Section 33 of the EIA Regulations and will be further developed in terms of specific requirements listed in any authorisations issued for the proposed project. The EMPr 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).

² Provincial Government Northern Cape, Department of Environmental Affairs and Development Planning: *Guideline for Environmental Management Plans*. 2005

This EMPr 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 EIA process.

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

The developer 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 EMPr and through its integration into the contract documentation. Since this EMPr is part of the EIA process for Project Blue Solar Energy Facility, it is important that this document be read in conjunction with the final Scoping and EIA Reports compiled for this project. This will contextualise the EMPr 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 EMPr and the environmental authorisation, the stipulations in the environmental authorisation shall prevail over that of the EMPr, unless otherwise agreed by the authorities in writing. Similarly, any provisions in legislation overrule any provisions or interpretations within this EMPr.

This EMPr 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 will be adhered to, and updated as relevant throughout the project life cycle.

KEY LEGISLATION APPLICABLE TO THE DEVELOPMENT CHAPTER 3

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

- » National Environmental Management Act (Act No. 107 of 1998)
- » EIA Regulations, published under Chapter 5 of the NEMA (GNR R543 in Government Gazette 33306 of 18 June 2010)
- » Guidelines published in terms of the NEMA EIA 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 EIA Process (DEA, 2010)
 - * Integrated Environmental Management Information Series (published by DEA)
- » Nama Khoi Municipality Integrated Development Plan (2011-2012)
- » Namakwa District Municipality Integrated Development Plan (2012-2016)
- » International guidelines – the Equator Principles and the International Finance Corporation and World Bank Guidelines.

Several other Acts, standards or guidelines have also informed the project process and the scope of issues assessed in this report. A listing of relevant legislation is provided in Table 3.1 and Table 3.2.

Table 3.1: Relevant legislative permitting requirements applicable to the proposed Project Blue 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 GN R543, R544, R545 and R546 of 18 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>Department of Environmental and Nature Conservation (DENC)- 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 EIA 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)	<p>In terms of the Duty of Care Provision in S28(1) the project proponent must ensure that reasonable measures are taken throughout the life cycle of this project to ensure that any pollution or degradation of the environment associated with 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>	Department of Environmental Affairs	<p>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 consideration of potential impacts (cumulative, direct, and indirect). It will continue to apply throughout the life cycle of the project.</p>
Environment Conservation Act (Act No 73 of 1989)	National Noise Control Regulations (GN R154 dated 10 January 1992)	Department of Environmental Affairs	Noise impacts are expected to be associated with the construction phase of the project and are not

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
		Department of Environmental and Nature Conservation (DENC)- Local Authorities	likely to present a significant intrusion to the local community. Therefore is no requirement for a noise permit in terms of the legislation. On-site activities should be limited to 6:00am - 6:00pm, Monday – Saturday (excluding public holidays). Should activities need to be undertaken outside of these times, the surrounding communities will need to be notified and appropriate approval will be obtained from DEA and the Local Municipality.
National Water Act (Act No 36 of 1998)	<p>Water uses under S21 of the Act must be licensed, unless such water use falls into one of the categories listed in S22 of the Act or falls under the general authorisation (and then registration of the water use is required).</p> <p>Consumptive water uses may include the taking of water from a water resource and storage - Sections 21a and b.</p> <p>Non-consumptive water uses may include impeding or diverting of flow in a water course - Section 21c;</p>	Department of Water Affairs Provincial Department of Water Affairs	<p>A water use license (WUL) is required to be obtained if wetlands or drainage lines are impacted on, or if infrastructure lies within 500m of such features.</p> <p>Should water be extracted from a borehole on site for use within the facility, a water use license will be required in terms of Section 21(a) and 21 (b) of the National Water Act.</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
	and altering of bed, banks or characteristics of a watercourse - Section 21i.		
Minerals and Petroleum Resources Development Act (Act No 28 of 2002)	<p>A mining permit or mining right may be required where a mineral in question is to be mined (e.g. materials from a borrow pit) in accordance with the provisions of the Act.</p> <p>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 resource that might occur on site.</p>	Department of Mineral Resources	<p>The infilling or depositing of material for access roads will be obtained from a registered borrow pit no mining permit or right is required to be obtained.</p> <p>A Section 53 application will be submitted the Northern Cape DMR office.</p>
National Environmental Management: Air Quality Act (Act No 39 of 2004)	Measures in respect of dust control (S32) and National Dust Control Regulations of February 2014. Measures to control noise (S34) - no regulations promulgated yet.	Department of Environmental Affairs	<p>No permitting or licensing requirements arise from this legislation. However, National, provincial and local ambient air quality standards (S9 - 10 & S11) to be considered.</p> <p>Measures in respect of dust control (S32) and the National Dust Control Regulations of February</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
			2014. 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 person has failed to comply with the Act.
National Heritage Resources Act (Act No 25 of 1999)	<ul style="list-style-type: none"> » Stipulates assessment criteria and categories of heritage resources according to their significance (S7). » Provides for the protection of all archaeological and palaeontological sites, and meteorites (S35). » Provides for the conservation and care of cemeteries and graves by SAHRA where this is not the responsibility of any other authority (S36). » Lists activities which require developers any person who intends to undertake to notify the responsible heritage resources authority and furnish it with details regarding the location, nature, and extent of the proposed development (S38). » Requires the compilation of a Conservation Management Plan as well as a permit from SAHRA for the presentation of archaeological sites as part of tourism attraction (S44). 	South African Heritage Resources Agency	An HIA has been undertaken as part of the EIA Process to identify heritage sites, there are not sensitive heritage object found on site, should a heritage resource be impacted upon, a permit may be required from SAHRA.

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
<p>National Environmental Management: Biodiversity Act (Act No 10 of 2004)</p>	<ul style="list-style-type: none"> » Provides for the MEC/Minister to identify any process or activity in such a listed ecosystem as a threatening process (S53) » A list of threatened and protected species has been published in terms of S 56(1) - Government Gazette 29657. » Three government notices have been published, i.e. GN R 150 (Commencement of Threatened and Protected Species Regulations, 2007), GN R 151 (Lists of critically endangered, vulnerable and protected species) and GN R 152 (Threatened or Protected Species Regulations). » 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 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, GN 1002), 9 December 2011). » This Act also regulates alien and invader species. 	<p>Department of Environmental Affairs</p>	<p>Under this Act, a permit would be required for any activity which is of a nature that may negatively impact on the survival of a listed protected species.</p> <p>An ecological study has been undertaken as part of the EIA Phase. As such the potentially occurrence protected species and the potential for them to be affected has been considered.</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
<p>Conservation of Agricultural Resources Act (Act No 43 of 1983)</p>	<ul style="list-style-type: none"> » Prohibition of the spreading of weeds (S5) » Classification of categories of weeds & invader plants (Regulation 15 of GN R1048) & restrictions in terms of where these species may occur. » Requirement & methods to implement control measures for alien and invasive plant species (Regulation 15E of GN R1048). 	<p>Department of Agriculture</p>	<p>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.</p> <p>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. There are none for the projects.</p>
<p>National Forests Act (Act No. 84 of 1998)</p>	<p>According to this Act, the Minister may declare a tree, group of trees, woodland or a species of trees as protected. The prohibitions provide that 'no person may cut, damage, disturb, destroy or remove any protected tree, or collect, remove, transport, export, purchase, sell, donate or in any other manner acquire or dispose of any protected tree, except under a licence granted by the Minister'.</p>	<p>National Department of Forestry</p>	<p>A licence is required for the removal of protected trees.</p>
<p>National Veld and Forest Fire Act (Act 101 of 1998)</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>Department of Agriculture, Forestry and Fisheries (DAFF)</p>	<p>While no permitting or licensing requirements arise from this legislation, this Act will find application during the construction and operational phase of the</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
	<p>In terms of S17, the applicant must have such equipment, protective clothing, and trained personnel for extinguishing fires.</p>		<p>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 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> <ul style="list-style-type: none"> • Group IV: any electronic product; and • Group V: any radioactive material. <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>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 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 throughout</p>	<p>Nama Khoi Local Municipality</p>	<p>The applicant must submit a land development application in the</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
	the Republic. S (2-4) provide general principles for land development and conflict resolution.		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.
National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008)	<p>The Minister may by notice in the Gazette publish a list of waste management activities that have, or are likely to have, a detrimental effect on the environment.</p> <p>The Minister may amend the list by –</p> <ul style="list-style-type: none"> » Adding other waste management activities to the list. » Removing waste management activities from the list. » Making other changes to the particulars on the list. <p>In terms of the Regulations published in terms of this Act (GN 921), A Basic Assessment or Environmental Impact 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 	<p>National Department of Water and Environmental Affairs (hazardous waste)</p> <p>Provincial Department of Environmental Affairs (general waste)</p>	<p>As no waste disposal site is to be associated with the proposed project, no permit is required in this regard.</p> <p>General 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. The DWAF (1998) Waste Management Series. Minimum Requirements for the Handling, Classification and Disposal of Hazardous Waste will also need to be considered.</p> <p>The volumes of solid waste to be generated and stored on the site during construction and operation of the facility will not require a waste license (provided these remain below the prescribed thresholds).</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
	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.		The contractor’s camp will result in sewage and grey water handling. Sewage is regarded as hazardous waste in terms of this Act. However the volume of hazardous waste generated from the construction and operation of the facility will not exceed the specified threshold volumes within the Waste Act (i.e. an annual throughput capacity of 2000m ³) and therefore a waste license from National DEA will not be required.
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	Department of Agriculture	Subdivision will have to be in place prior to any subdivision approval in terms of S24 and S17 of the Act.
National Road Traffic Act (Act No 93 of 1996)	» The technical recommendations for highways (TRH 11): “Draft Guidelines for Granting of Exemption Permits for the Conveyance of Abnormal Loads and for other Events on Public Roads” outline the rules and conditions which apply to the transport of abnormal loads and vehicles on public roads and the detailed procedures to be followed in applying for exemption permits are described and discussed. » Legal axle load limits and the restrictions imposed on abnormally heavy loads are discussed in relation to the damaging effect on	» South African National Roads Agency Limited (national roads) » Provincial Department of Transport	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 carrying abnormally heavy or abnormally dimensioned loads. Transport vehicles exceeding the dimensional limitations (length) of 22m. Depending on the trailer configuration and height when

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
	<p>road pavements, bridges, and culverts.</p> <ul style="list-style-type: none"> » 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>loaded, some of the power station components may not meet specified dimensional limitations (height and width).</p>
Provincial Legislation			
<p>Northern Cape Nature Conservation Act, Act No. 9 of 2009</p>	<p>This Act provides for the sustainable utilisation of wild animals, aquatic biota and plants; provides for the implementation of the Convention on International Trade in Endangered Species of Wild Fauna and Flora; provides for offences and penalties for contravention of the Act; provides for the appointment of nature conservators to implement the provisions of the Act; and provides for the issuing of permits and other authorisations. Amongst other regulations, the following may apply to the current project:</p> <ul style="list-style-type: none"> » Boundary fences may not be altered in such a way as to prevent wild animals from freely moving onto or off of a property; » Aquatic habitats may not be destroyed or damaged; » The owner of land upon which an invasive species is found (plant or animal) must take the 	<p>Northern Cape Department of Environment and Nature Conservation</p>	<p>A collection/destruction permit must be obtained from Northern Cape Nature Conservation for the removal of any protected plant species found on site. Additionally, a permit for the disturbance or destruction of indigenous species must be applied for.</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
	<p>necessary steps to eradicate or destroy such species.</p> <ul style="list-style-type: none"> » The Act provides lists of protected species for the Province. 		
<p>Astronomy Geographic Advantage Act (Act No. 21 of 2007)</p>	<ul style="list-style-type: none"> » The Astronomy Geographic Advantage Act (No. 21 of 2007) provides for the preservation and protection of areas within South Africa that are uniquely suited for optical and radio astronomy; for intergovernmental co-operation and public consultation on matters concerning nationally significant astronomy advantage areas and for matters connected thereto. » Chapter 2 of the act allows for the declaration of astronomy advantage areas whilst Chapter 3 pertains to the management and control of astronomy advantage areas. Management and control of astronomy advantage areas include, amongst others, the following: <ul style="list-style-type: none"> » Restrictions on use of radio frequency spectrum in astronomy advantage areas; » Declared activities in core or central astronomy advantage area; » Identified activities in coordinated astronomy advantage area; and » Authorisation to undertake identified activities. 	<p>South Africa Kilometre Array</p>	<p>On 19 February 2010, the Minister of Science and Technology (the Minister) declared the whole of the territory of the Northern Cape province, excluding Sol Plaatje Municipality, as an astronomy advantage area for radio astronomy purposes in terms of Section 5 of the Act and on 20 August 2010 declared the Karoo Core Astronomy Advantage Area for the purposes of radio astronomy.</p>

Table 3.2: Standards applicable to Project Blue Solar Energy Facility

Theme	Standard	Summary
Air	South African National Standard (SANS) 69	Framework for setting and implementing national ambient air quality standards
	SANS 1929: Ambient Air Quality	Sets limits for common pollutants
Noise	SANS 10328:2003: Methods for Environmental Noise Impact Assessments	General procedure used to determine the noise impact
	SANS 10103:2008: The Measurement and Rating of Environmental Noise with Respect to Land Use, Health, Annoyance and Speech Communication	Provides noise impact criteria
	National Noise Control Regulations	Provides noise impact criteria
	SANS 10210: Calculating and Predicting Road Traffic Noise	Provides guidelines for traffic noise levels
Waste	DWAF (1998) Waste Management Series. Minimum Requirements for the Handling, Classification and Disposal of Hazardous Waste	DWAF Minimum Requirements
	National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) – National norms and standard for the storage of waste.	<ul style="list-style-type: none"> » Provides uniform national approach relating the management of waste facilities » Ensure best practice in management of waste storage » Provides minimum standards for the design and operation of new and existing waste storage
Water	Best Practise Guideline (G1) Storm Water Management DWA 2006	Provides guidelines to the management of storm water
Water	South African Water Quality Guidelines	Provides water quality guidelines
Others	<ul style="list-style-type: none"> » Nama Khoi Local Municipality IDP » Namakwa District Municipality Integrated Development Plan (2012-2016) 	According to the Municipal Systems Act of 2000, all Municipalities have to undertake an Integrated Development Planning (IDP) process to produce Integrated Development Plans (IDPs). As the IDP is a legislative requirement it has a legal status and it supersedes all other plans that guide development at local government level.

STRUCTURE OF THIS EMPR

CHAPTER 4

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

- » Pre-Construction (Planning & Design) activities;
- » Construction activities;
- » Operation activities; and
- » Decommissioning activities.

These chapters set out the procedures necessary for WWK Development (Pty) Ltd, as the project developer, to minimise environmental impacts and achieve environmental compliance. For each of the phases of implementation, an overarching environmental **goal** is stated. In order to meet this goal, a number of **objectives** are listed. The EMPr 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 EMPr table has been established for each environmental objective. The information provided within the EMPr 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 EIA 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 EMPr.
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 EMPr 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 or should be modified.

4.1 Project Team

This draft EMPr was compiled by Lusani Rathanya holds a Bachelor degree with Honours in Environmental Management and Analysis and has 1 year 8 months experience in the environmental consulting field. Her key focus is on environmental impact assessments, public participation, environmental management plans and programmes for a variety of environmental projects. She is currently involved in several EIAs for renewable energy project EIAs across the country. Specialists involved in the preparation of management measures include:

	Name	Company
EMPr Compilers:	Lusani Rathanya Jo-Anne Thomas	Savannah Environmental
Specialists:	Dave McDonald	BergWind Botanical Surveys
	Simon Todd	Simon Todd Consulting cc
	Johan van der Waals	Terrasoil Science
	Jayson Orton	ACO
	Lourens du Plessis	MetroGIS
	Tony Barbour	Tony Barbour Consulting and Research

The Savannah Environmental team have extensive knowledge and experience in EIAs and environmental management, having been involved in EIA processes

over the past fifteen years. They have managed and drafted EMPrs for other power generation projects throughout South Africa, including numerous wind and solar energy facilities.

ROLES AND RESPONSIBILITIES

CHAPTER 5

5.1 Roles and Responsibilities for the Construction Phase of the Solar Energy Facility

As the Proponent, WWK Development (Pty) Ltd must ensure that the implementation of the solar energy facility complies with the requirements of any and all environmental authorisations and permits, and obligations emanating from other relevant environmental legislation. This obligation is partly met through the development of the EMPr, and the implementation of the EMPr through its integration into the contract documentation. WWK Development (Pty) Ltd will retain various key roles and responsibilities during the construction of the solar energy facility. These are outlined below.

Specific responsibilities of the Owner's Representatives; Environmental Control Officer and EPC Contractor for the construction phase of this project are as detailed below.

The **Owner's Representative (i.e. General Manager and/or Site 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 WWK Development (Pty) Ltd and its Contractor(s) are made aware of all stipulations within the EMPr.
- » Ensure that the EMPr is correctly implemented throughout the project cycle by means of site inspections and meetings. This will be documented as part of the site meeting minutes.
- » Be fully knowledgeable with the EIA for the project, the EMPr, the conditions of the facility Environmental Authorisation, and all relevant environmental legislation.

The **Owner's Engineer (i.e. Project Manager and/or Site manager)** will:

- » Be fully knowledgeable with the contents and conditions of the facility Environmental Authorisation.
- » Be fully knowledgeable with the contents of the EMPr.
- » Have overall responsibility for the implementation of the EMPr .
- » Ensure there is communication with the Project Manager, the ECO, and relevant discipline engineers on matters concerning the environment.
- » Ensure that no actions are taken which will harm or may indirectly cause harm to the environment, and take steps to prevent pollution on the site.
- » Confine activities to the demarcated construction site.

An independent³ **Environmental Control Officer (ECO)** must be appointed by the project proponent prior to the commencement of any authorised activities and will be responsible for monitoring, reviewing and verifying compliance by the Contractor with the environmental specifications of the EMPr and the conditions of the Environmental Authorisation. Accordingly, the ECO will:

- » Be fully knowledgeable with the contents with the EIA.
- » Be fully knowledgeable with the contents with the conditions of the facility Environmental Authorisation.
- » Be fully knowledgeable with the contents with the EMPr.
- » 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 EMPr is monitored through regular and comprehensive inspection of the site and surrounding areas.
- » Ensure that if the EMPr 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 EMPr.
- » 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 EMPr and conditions of the facility Environmental Authorisation .
- » Keep record of all activities on site, problems identified, transgressions noted and a task schedule of tasks undertaken by the ECO.

³A person who is not from any of the parties involved in the design or construction of the Solar Energy Facility

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 EMPr must be easily accessible to all on-site staff members.
- » Employees must be familiar with the requirements of this EMPr 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 appropriate Method Statements are drafted submitted to the Site Manager (and ECO) for approval before any work is undertaken.
- » 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 EMPr (i.e. ensure their staff are appropriately trained as to the environmental obligations).

Environmental officer:

- » Ensure that environmental issues receive adequate attention in the site induction training
- » prepare and conduct awareness training (e.g. posters, tool box talks, signage)
- » conduct monthly observation and inspection and audit of all work places
- » monitor Contractor's compliance with EA, EMP, and any permits and licenses on site
- » conduct daily observations and monthly environmental audits of all Contractor's and work areas
- » ensure that all environmental monitoring programmes are carried out according to protocols and schedules
- » monitoring of completed work (e.g. areas top-soiled, re-vegetated, stabilised etc.)
- » maintain site documentation related to environmental management (permits, CEMP, method statements, EA, reports, audits, monitoring results, receipts for waste removal etc.)
- » Inspect and report on environmental incidents and check corrective action
- » keep a regular photographic record of all environmental incidents
- » management of complaints register
- » review and of method statements prepared by contractors
- » audit site performance against environmental method statements

5.2. Roles and Responsibilities for the Operation Phase of the Solar Energy Facility

Formal responsibilities are necessary to ensure that key procedures are executed. Specific responsibilities of Solar Energy Facility Operations Manager, and Environmental Manager for the operation phase of this project are detailed below.

The **Facility Manager** will:

- » Ensure that adequate resources (human, financial, technology) are made available and appropriately managed for the successful implementation of the operational EMPr.
- » Conduct annual basis reviews of the EMPr to evaluate its effectiveness.
- » Take appropriate action as a result of findings and recommendations in management reviews and audits.
- » Provide forums to communicate matters regarding environmental management.

The **Environmental Manager** will:

- » Develop and Implement an Environmental Management System (EMS) for the solar energy facility and associated infrastructure.
- » Manage and report on the facility's environmental performance.
- » Maintain a register of all known environmental impacts and manage the monitoring thereof.
- » Conduct internal environmental audits and co-ordinate external environmental audits.
- » Liaise with statutory bodies such as the National and Provincial Department of Environmental Affairs (DEA) on environmental performance and other issues.
- » Conduct environmental training and awareness for the employees who operate and maintain the solar energy facility.
- » Compile environmental policies and procedures.
- » Liaise with interested and affected parties on environmental issues of common concern.
- » Track and control the lodging of any complaints regarding environmental matters.

MANAGEMENT PROGRAMME: PRE-CONSTRUCTION (PLANNING & DESIGN) CHAPTER 6

Overall Goal: undertake the pre-construction activities (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 pre-construction activities are undertaken in accordance with all relevant legislative requirements
- » 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.

6.1. Objectives

OBJECTIVE PD1 : Ensure the facility design responds to identified environmental constraints and opportunities

A stormwater management plan must be compiled (usually done by an engineering company as part of the final design) that details how storm water runoff will be managed to reduce velocities and volumes of water that could lead to erosion of surfaces.

Project Component/s	<ul style="list-style-type: none"> » PV panels. » Substation. » Access roads. » Power line. » Laydown areas and construction camp area
Potential Impact	<ul style="list-style-type: none"> » Impact on identified sensitive areas.
Activities/Risk Sources	<ul style="list-style-type: none"> » 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 practical, thereby mitigating potential impacts.
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Mitigation: Action/Control	Responsibility	Timeframe
Plan and conduct pre-construction activities in an environmentally acceptable manner	Developer	Design phase
Consider design level mitigation measures recommended by the specialists, especially with respect to ecology, heritage and visual aesthetics, as detailed within the EIA report and relevant appendices.	Engineering Design Consultant / Developer	Tender Design & Design Review Stage
Access roads to be carefully planned to minimise the impacted area and prevent unnecessary over compaction of soil.	Developer	Design phase
A comprehensive stormwater management plan must be compiled that details how storm-water will be managed to reduce velocities and volumes of water that could lead to erosion of surfaces.	Developer	Design phase
A detailed geotechnical investigation is required for the design phase. This should be undertaken with due regard for all environmental legislative requirements.	Developer	Design phase
Submit a final layout to DEA prior to the commencement of construction. This layout should provide information on all components of the project.	Developer	Pre-construction
Obtain all relevant permits (e.g. protected plants and trees) prior to construction in an area.	Developer	Pre-construction
A traffic management plan must be prepared for site access roads to minimise or where possible avoid the hazards which could result from increased traffic and to ensure that traffic flow is not adversely affected. This document would be a working document to be updated as and when required.	Contractor	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 EIA Report.
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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.
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OBJECTIVE PD2 : Ensure the selection of the best environmental option for the alignment of the power lines, development areas and access roads

Project Component/s	<ul style="list-style-type: none"> » PV Array » Grid connection and associated servitudes » Access roads » Workshop, guardhouses, substation and other related infrastructure » Temporary construction camps » Protective fencing around development » Potential topsoil stockpiles and/or borrow pits
Potential Impact	<ul style="list-style-type: none"> » Substantially increased loss of species of conservation concern and other natural vegetation at construction phase, waste of on-site plant resources, lack of locally sourced material for rehabilitation of disturbed areas; » Increased cost of rehabilitation
Activities/Risk Sources	<ul style="list-style-type: none"> » Construction related loss and damage to natural vegetation and fauna
Mitigation: Target/Objective	<ul style="list-style-type: none"> » Rescue, maintenance and subsequent replanting of at least all bulbous and most succulent protected plant species within the specific land portion

Mitigation: Action/Control	Responsibility	Timeframe
Ecological footprint investigation and recording of localities of all red data species and indication of presence of other species of conservation concern (Design Phase)	Ecologist	Prior to commencement of activity
<ul style="list-style-type: none"> » Search and Rescue (S&R) of all protected plants that will be affected by the development, especially species occurring in long term and permanent, hard surface development footprints (i.e. all buildings, new roads and tracks, laydown areas, and panel positions) should take place. <ul style="list-style-type: none"> ○ The necessary permits must be in place » Plants that can be considered for rescue and included in subsequent rehabilitation programs are all tubers, bulbs, and indigenous succulents » All development footprints must be surveyed and pegged out as soon as possible, after which a local horticulturist/contractor with Search and Rescue experience should be appointed to 	Horticultural Contractor, monitored and approved by ECO	Prior to construction

Mitigation: Action/Control	Responsibility	Timeframe
<p>undertake the S&R.</p> <ul style="list-style-type: none"> » All rescued species should be transplanted immediately or bagged (or succulents left to first air-dry before planting) and kept in the horticulturist's or a designated on-site nursery, and should be returned to site or land portion once all construction is completed and rehabilitation of disturbed areas is required. This nursery should be appropriately managed to ensure the maintenance of the plant specimens for reuse in rehabilitation. » As far as possible, replanting should occur in spring to early summer once sufficient rains have fallen, in order to facilitate establishment. 		
<p>In line with specifications regarding permissible biodiversity and the rehabilitation plan, a minimum percentage cover of vegetation must be established and permanently maintained post construction</p>	<p>Developer and horticultural contractor</p>	<p>After construction, throughout operational phase</p>
<p>All cable trenches, excavations, etc, through sensitive areas should be excavated carefully in order to minimise damage to surrounding areas and biodiversity.</p> <ul style="list-style-type: none"> » The trenches must be checked on a daily basis for the presence of trapped animals. » Any animals found must be removed in a safe manner, unharmed, and placed in an area where the animal will be comfortable. » If the ECO or contractor is unable to assist in the movement of a fauna species, ensure a member of the conservation authorities assists with the translocation. » All mammal, large reptiles and avifauna species found injured during construction will be taken to a suitably qualified veterinarian or rehabilitation centre to either be put down in a humane manner or cared for until it can be released again » Sociable weavers' nests occur within the development area should be avoided as far as possible. Nests may only be removed with a permit and by a suitably qualified specialist, usually supervised by conservation staff. 	<p>Contractor / ECO</p>	<p>Duration of construction</p>

<p>Performance Indicator</p>	<ul style="list-style-type: none"> » Rescue of species of conservation concern » No damage or injury to fauna » Re-establishment of rescued species
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Monitoring	<ul style="list-style-type: none"> » ECO to monitor Search and Rescue, continue search and rescue operations during the construction process where it becomes necessary after the initial S&R » It may be possible that geophytic species may emerge during construction that were not accounted for in the original S&R plan – once observed the ECO should consult the botanists on the identification and possible S&R for those plant species
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OBJECTIVE PD3: 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
Potential Impact	» Impacts on affected and surrounding landowners and land uses
Activity/risk source	<ul style="list-style-type: none"> » Activities associated with solar energy facility construction » Activities associated with solar energy facility operation
Mitigation: Target/Objective	<ul style="list-style-type: none"> » 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. This procedure should be in line with the South African Labour Law.	Developer	Pre-construction (construction procedure) Pre-operation (operation procedure)
Liaison with landowner is to be undertaken prior to the commencement of construction in order to provide sufficient time for him to plan agricultural activities.	Developer / Contractor	Pre-construction

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

MANAGEMENT PROGRAMME: CONSTRUCTION

CHAPTER 7

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

- » Ensures that construction activities are properly 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.

7.1 Objectives

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

OBJECTIVE C1: Securing the site and site establishment

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). » Laydown areas and site camps
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. » Site clearance and levelling activities.
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	Contractor	Erection: during site

Mitigation: Action/Control	Responsibility	Timeframe
Environmental Officer.		establishment Maintenance: for duration of Contract
The Contractor must take all reasonable measures to ensure the safety of the public in the surrounding area.	Contractor	Erection: during site establishment Maintenance: for duration of Contract
Where the public could be exposed to danger by any of the works or site activities, the contractor must, as appropriate, provide suitable flagmen, barriers and/or warning signs in English and any other relevant locally spoken languages, all to the approval of the Site Manager.	Contractor	Erection: during site establishment Maintenance: for duration of Contract
Where necessary to control access, fence and secure area (especially relevant to no-go areas).	Contractor	Erection: during site establishment Maintenance: for duration of Contract
Contractors and construction workers must be informed of the no-go areas.	Developer	Construction
Fence and secure Contractor's equipment camp.	Contractor	Erection: during site establishment Maintenance: for duration of Contract
Perimeter fencing around the broader site/ farm portions for the solar energy facility ((which is clearly indicated with flags to be implemented. All deep excavations must be adequately protected. There is to be no unauthorised disturbance outside the demarcated development footprint. Any activities outside the development footprint to be authorised by the Owner's Representative.	Contractor	Erection: during site establishment Maintenance: for duration of Contract

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 facilities provided at construction site.
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	» No disturbance of vegetation outside of development footprint.
Monitoring	<ul style="list-style-type: none"> » An incident reporting system will be used to record non-conformances to the EMPr. » 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 C2: Environmentally Sensitive Location Of Temporary Construction Equipment Camps On Site

The purpose of this camp is to confine activities and storage of equipment to one designated area to limit the potential ecological impacts associated with this phase of the project. The laydown area(s) will be used for assembly purposes and the general placement/storage of construction equipment. Construction equipment and materials may need to be stored at an appropriate location on the site for the duration of the construction period. There are designated areas as shown on the layout plan. Deviations from this should be agreed with the ECO prior to these being implemented.

Project Component/s	<ul style="list-style-type: none"> » Construction equipment camps (temporary) » Facilities for storing, mixing and general handling of materials » Access roads
Potential Impact	<ul style="list-style-type: none"> » Damage to and loss of indigenous biodiversity; » Damage to and/or loss of topsoil; » Initiation of accelerated erosion; » Compacting of ground; » Pollution of the surrounding environment due to inadequate or inappropriate facilities; and » Impacts on landowners
Activities/Risk Sources	<ul style="list-style-type: none"> » Vegetation clearing and levelling of equipment storage area/s; and » Access to and from the equipment storage area/s.
Mitigation: Target/Objective	<ul style="list-style-type: none"> » To minimise impacts on the social and biophysical environment; and » To limit equipment storage to within the demarcated site.

Mitigation: Action/Control	Responsibility	Timeframe
The location of the construction equipment camp will take cognisance of any ecologically and heritage sensitive areas identified. The final location of this construction equipment camp shall be approved by the project ECO.	Contractor	Pre-construction

Mitigation: Action/Control	Responsibility	Timeframe
No temporary site camps will be allowed outside the footprint of the development area.	Contractor	Contract duration
Any deviation from the approved construction equipment camp and/or laydown area location, or any other temporary area may not be undertaken without approval from the ECO.	Contractor	Contract duration
As far as possible, minimise vegetation clearing and levelling for equipment storage areas.	Contractor	Erection: Site establishment Maintenance: contract duration
Prepare sites in line with other mitigation measures outlined to minimise damage to environment and biodiversity. After demarcation, the site may not be cleared without the inspection of mitigation measures undertaken and approval of the ECO	Contractor, in consultation with the ECO'	Contract duration
Rehabilitate and re-vegetate all disturbed areas at the construction equipment camp as soon as construction is complete within an area.	Contractor	Duration of Contract

Performance Indicator	<ul style="list-style-type: none"> » No visible erosion scars once construction in an area is completed. » No claims regarding damage due to unauthorised removal of vegetation or loss of fauna. » All damaged areas successfully rehabilitated one year after completion. » No damage to drainage lines and/or pan areas. » Appropriate waste management and zero pollution.
Monitoring	<ul style="list-style-type: none"> » Regular audits of the construction camps and areas of construction on site. » A photographic record must be established before, during and after mitigation. » An incident reporting system should be used to record non-conformances to the EMPr.

OBJECTIVE C3: Conservation of Namaqualand Strandveld and minimization of impacts due to construction

Prior to any earthworks (including road construction) in a demarcated area, The ECO needs to inspect the area and supervise the removal and relocation of any individual of mammal, reptile or amphibian that may be on the site, either in burrows or just traversing the area. Sociable weavers' nests occur within the development area should be avoided as far as possible. Nests may only be

removed with a permit and by a suitably qualified specialist, usually supervised by conservation staff.

Fences and roads must be constructed in such a way that they do not prevent the natural migration of small mammals, reptiles, or amphibians.

Project Component/s	<ul style="list-style-type: none"> » PV Array » Grid connection and associated servitudes » Access roads and fences
Potential Impact	<ul style="list-style-type: none"> » Removal and loss of Namaqualand Strandveld
Activities/Risk Sources	<ul style="list-style-type: none"> » Non-compliance with recommended mitigation measures
Mitigation: Target/Objective	<ul style="list-style-type: none"> » The target would be to minimize loss of Namaqualand Strandveld wherever possible. This could be achieved by AVOIDANCE of disturbance in the first place and secondly by restoration (rehabilitation) of the vegetation, particularly in area which are only required for the construction phase e.g. crane hard-standing and lay-down areas.

Mitigation: Action/Control	Responsibility	Timeframe
Construction activities for solar PV panels must be contained within the approved footprint of the proposed PV and hard-standing areas.	Contractor Specialist	Prior to and during construction
All construction, concrete batching etc. must take place in designated construction areas.	Contractor	Prior to and during construction
There should be no random traversing of the natural vegetation off designated construction areas and roads.	Contractor	Prior to and during construction
All solid and liquid waste must be removed from the construction areas and not discarded in the natural vegetation.	Contractor	Prior to and during construction
An important objective should be to reduce negative edge effects e.g. no unnecessary tracks or roads should be permitted.	Contractor	Prior to and during construction
Micro-siting of PV panels localities would be necessary to ensure that sensitive small-scale sites are not disturbed. This would apply particularly to heuweltjies which should be avoided wherever possible. Quartz patches and rocky outcrops with sensitive micro-habitats must be AVOIDED. PV panels should be located in the least sensitive general matrix of Namaqualand Strandveld.	Contractor	Prior to and during construction
Any building materials brought onto site would require monitoring for propagules of invasive plant species such	Contractor	Prior to and during

Mitigation: Action/Control	Responsibility	Timeframe
as <i>Prosopis</i> spp. (mesquite).		construction
PV sites that are to be cleared must have topsoil removed first which should be set aside and used for covering disturbed areas during restoration activities	Contractor	Prior to and during construction
Any areas that can be restored after construction must be identified and actively rehabilitated under the direction of a qualified restoration practitioner.	Contractor	Prior to and during construction

Performance Indicator	<ul style="list-style-type: none"> » Compliance with recommended mitigation measures. ECO to keep a log of activities which must be inspected and signed off once monthly by the resident engineer. » The contractor should appoint a suitably qualified restoration specialist to compile a vegetation rehabilitation plan. The restoration specialist must submit the vegetation rehabilitation plan to the ECO and Resident Engineer for approval. The vegetation rehabilitation plan should include: <ul style="list-style-type: none"> » Seed collection, harvesting methods and seed storage methods; » Search and rescue of succulents (those that can be transplanted) and geophytes (bulbs); » Handling and rescued plant material; » Establishment of a holding area or nursery from which plants to be used for restoration can be sourced; » Report to the ECO on progress, obstacles etc. » Re-vegetation of construction areas should take place as soon after completion of construction as possible. No construction vehicles, equipment and unauthorized people to be allowed into areas that have been re-vegetated.
Monitoring	<ul style="list-style-type: none"> » It will be the responsibility of the ECO to ensure compliance of the contractor and restoration specialist with recommended mitigation measures and to monitor the outcomes. Bi-monthly reporting would be required.

OBJECTIVE C4: Limit disturbance of vegetation and loss of faunal habitat during construction

Prior to any earthworks (including road construction) in a demarcated area, The ECO needs to inspect the area and supervise the removal and relocation of any individual of mammal, reptile or amphibian that may be on the site, either in burrows or just traversing the area. Sociable weavers' nests occur within the development area should be avoided as far as possible. Nests may only be removed with a permit and by a suitably qualified specialist, usually supervised by conservation staff.

Fences and roads must be constructed in such a way that they do not prevent the natural migration of small mammals, reptiles, or amphibians.

Project Component/s	<ul style="list-style-type: none"> » PV Array » Grid connection and associated servitudes » Access roads and fences
Potential Impact	<ul style="list-style-type: none"> » Loss of faunal habitat and impacts on resident listed and non-listed species
Activities/Risk Sources	<ul style="list-style-type: none"> » Construction activities
Mitigation: Target/Objective	<ul style="list-style-type: none"> » Minimal impact on terrestrial environment. » Reduced impact and disturbance of terrestrial fauna

Mitigation: Action/Control	Responsibility	Timeframe
Erosion control should begin in the construction phase and should be integrated into the design features of the facility.	Contractor	Prior to and during construction
Demarcate areas to be cleared.	Contractor	Prior to and during construction
Revegetation of cleared areas that are no longer used or monitoring to ensure that recovery is taking place	Contractor	Prior to and during construction
Alien plant clearing where necessary.	Contractor	Prior to and during construction
Temporary lay-down areas should be in areas that are already transformed or will be used post-construction as part of the development.	Contractor	Prior to and during construction

Performance Indicator	<ul style="list-style-type: none"> » No cleared areas remain after construction
Monitoring	<ul style="list-style-type: none"> » Monitor alien plant abundance an annual basis. » Document revegetation actions taken and their success » Document erosion problems and the control measures implemented

OBJECTIVE C5: Limit direct faunal impacts

Prior to any earthworks (including road construction) in a demarcated area, The ECO needs to inspect the area and supervise the removal and relocation of any

individual of mammal, reptile or amphibian that may be on the site, either in burrows or just traversing the area. Sociable weavers' nests occur within the development area should be avoided as far as possible. Nests may only be removed with a permit and by a suitably qualified specialist, usually supervised by conservation staff.

Fences and roads must be constructed in such a way that they do not prevent the natural migration of small mammals, reptiles, or amphibians.

Project Component/s	<ul style="list-style-type: none"> » PV Array » Grid connection and associated servitudes » Access roads and fences
Potential Impact	» Loss of individuals of affected species due to operation of construction machinery as well as poaching and hunting risk from personnel.
Activities/Risk Sources	» 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	Contractor	Prior to and during construction
ECO to monitor and enforce ban on hunting, collecting etc of all plants and animals or their products.	Contractor/ECO	Prior to and during construction
Speed limits to apply to all construction vehicles to reduce likelihood of collisions with fauna. Dust suppression during construction.	Contractor	Prior to and during construction

Performance Indicator	<ul style="list-style-type: none"> » Low mortality of fauna during construction » No poaching of fauna by construction personnel during construction
Monitoring	» <ul style="list-style-type: none"> • Monitoring for compliance during the construction phase

OBJECTIVE C6: Minimisation of disturbance to topsoil

Topsoil conservation is an integral part of rehabilitation efforts and helps to maintain the productive capability and ecological functionality of rangelands.

Removal of topsoil should be done if possible where:

- » Areas will be excavated
- » Areas will be severely compacted
- » Areas will be buried with excavated material
- » Areas will be permanently covered with altered surfaces

Topsoil must at all times be treated as a valuable natural resource, and may thus not be discarded or degraded. In many sections of the development area, topsoils are very shallow or rocky, which would make topsoil removal difficult. Grading in such areas should be kept as low as possible.

Project Component/s	<ul style="list-style-type: none"> » PV Array supports and trenching » Grid connection and associated servitudes » Access roads » Workshop, guardhouses, substation and other related infrastructure » Potential topsoil stockpiles and/or borrow pits
Potential Impact	<ul style="list-style-type: none"> » Loss of topsoil and natural resources and biological activity within the topsoil » Loss of natural regeneration potential of soils » Loss of agricultural potential of soils.
Activity/Risk Source	<ul style="list-style-type: none"> » Site preparation and earthworks » Excavation of foundations and trenches » Construction of site access road » Power line construction activities » PV array construction activities » Stockpiling of topsoil, subsoil and spoil material.
Mitigation: Target/Objective	<ul style="list-style-type: none"> » To retain full biological activity and functionality of topsoil » To retain desirable natural vegetation, where possible » To minimise footprints of disturbance of vegetation/habitats » Remove and store all topsoil on areas that are to be excavated; and use this topsoil in subsequent rehabilitation of disturbed areas » Minimise spoil material

Mitigation: Action/Control	Responsibility	Timeframe
Areas to be cleared must be clearly marked on-site to eliminate the potential for unnecessary disturbance. » All woody material cleared must be shredded to coarse chips	Contractor in consultation with Specialist	Pre-construction
Construction activities must be restricted to demarcated areas so that impact on topsoil is minimised.	Contractor	Before and during construction, operational phase

Mitigation: Action/Control	Responsibility	Timeframe
<p>Salvaging topsoil:</p> <ul style="list-style-type: none"> » Topsoil must always be salvaged and stored separately from subsoil and lower-lying parent rock or other spoil material. <ul style="list-style-type: none"> ○ Topsoil stripping removes up to 30 cm or less of the upper soils, depending on the site conditions. ○ In cultivated areas, depth of topsoil may increase and needs to be confirmed with the land owner » Prior to salvaging topsoil the depth, quality and characteristics of topsoil should be known for every management area. <ul style="list-style-type: none"> ○ This will give an indication of total volumes of topsoil that need to be stored to enable the proper planning and placement of topsoil storage. ○ Different types of topsoil – rocky soils and sands or loams must be stored separately » Topsoils should be removed (and stored) under dry conditions to avoid excessive compaction whenever topsoil will have to be stored for longer than one year. 	<p>Contractor</p>	<p>Before and during construction</p>
<p>Storing topsoil:</p> <ul style="list-style-type: none"> » Viability of stored topsoil depends on moisture, temperature, oxygen, nutrients and time stored. » Rapid decomposition of organic material in warm, moist topsoils rapidly decreases microbial activity necessary for nutrient cycling, and reduces the amount of beneficial micro-organisms in the soil. » Stockpile location if not adjacent to a linear development: <ul style="list-style-type: none"> ○ At least 50 m from any wetland or watering point ○ Ideally a disturbed but weed-free area » <i>Topsoil is typically stored in berms with a width of 150 – 200 cm, and a maximum height of 100 cm, preferably lower</i> <ul style="list-style-type: none"> ○ Place berms along contours or perpendicular to the prevailing wind direction ○ Adhere to the following general rule: the larger the pile of topsoil storage needs to be, the shorter should be the time it is stored » Topsoil handling should be reduced to stripping, piling (once), and re-application. Between the piling and reapplication, stored topsoils should not undergo any further handling except control of erosion and (alien 	<p>Contractor</p>	<p>Before and during construction</p>

Mitigation: Action/Control	Responsibility	Timeframe
<p>invasive vegetation</p> <ul style="list-style-type: none"> » Where topsoil can be reapplied within six months to one year after excavation, it will be useful to store the topsoil as close as possible to the area of excavation and re-application, e.g. next to cabling trenches <ul style="list-style-type: none"> ○ In such case, use one side of the linear development for machinery and access only ○ Place topsoil on the other/far side of this development, followed by the subsoil (also on geotextile) ○ If there will be a need for long-term storage of topsoil in specified stockpiles, this must be indicated in the design phase already and accompanied by a detailed topsoil stockpile management plan » In cases where topsoil has to be stored longer than 6 months or during the rainy season, soils should be kept as dry as possible and protected from erosion and degradation by: <ul style="list-style-type: none"> ○ Preventing puddling on or between heaps of topsoil ○ Or covering topsoil berms ○ Preventing all forms of contamination or pollution ○ Preventing any form of compaction ○ Monitoring establishment of all invasive vegetation and removing such if it appears ○ Keeping slopes of topsoil at a maximal 2:1 ratio ○ Monitoring and mitigating erosion where it appears ○ Where topsoil needs to be stored in excess of one year, it is recommended to either cover the topsoil or allow an indigenous grass cover to grow on it – if this does not happen spontaneously, seeding should be considered 		
<p>Reapplying topsoils:</p> <ul style="list-style-type: none"> » Spoil materials and subsoil must be back-filled first, then covered with topsoil <ul style="list-style-type: none"> ○ It is recommended that where feasible, spoil materials be used to fill in and close old mine pits in the development area that currently pose a great safety risk to man and animals » Generally, topsoils should be re-applied to a depth equal to slightly greater than the topsoil horizon of a pre-selected undisturbed reference site » The minimum depth of topsoil needed for revegetation to be successful is approximately 20 cm 	Contractor	Before and during construction

Mitigation: Action/Control	Responsibility	Timeframe
<ul style="list-style-type: none"> » If the amount of topsoil available is limited, a strategy must be worked to out to optimise revegetation efforts with the topsoil available » Reapplied topsoils should be landscaped in a way that creates a variable microtopography of small ridges and valleys that run parallel to existing contours of the landscape. The valleys become catch-basins for seeds and act as run-on zones for rainfall, increasing moisture levels where the seeds are likely to be more concentrated. This greatly improves the success rate of revegetation efforts. » To stabilise reapplied topsoils and minimise raindrop impact and erosion: <ul style="list-style-type: none"> ○ Use organic material from cleared and shredded woody vegetation where possible ○ Alternatively, suitable geotextiles or organic erosion mats can be used as necessary » Continued monitoring will be necessary to detect any sign of erosion early enough to allow timeous mitigation 		
<p>Re-applied topsoils need to be re-vegetated as soon as possible, following the revegetation and rehabilitation plan.</p>	Contractor	Before and during construction, monitored during operational phase
<p>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.</p>	Contractor	Duration of the construction phase
<p>Topsoil stockpiles must be conserved against losses through erosion by establishing vegetation cover on them.</p>	Contractor	Duration of the construction phase
<p>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.</p>	Contractor	Duration of the construction phase

Performance Indicator	<ul style="list-style-type: none"> » Minimal disturbance outside of designated work areas. » Topsoil appropriately stored, managed, and rehabilitated.
Monitoring	<ul style="list-style-type: none"> » Monitoring of appropriate methods of vegetation clearing and soil management activities by ECO throughout construction phase.

	<ul style="list-style-type: none"> » An incident reporting system will be used to record non-conformances to the EMP. » Regular monitoring of topsoil after construction by developer until such topsoil can be regarded as fully rehabilitated, stable and no longer prone to accelerated erosion » 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. » Record the GPS coordinates of each area. » Record the date of topsoil stripping. » Record the GPS coordinates of where the topsoil is stockpiled. » Record the date of cessation of constructional (or operational) activities at the particular site. » Photograph the area on cessation of constructional activities. » Record date and depth of re-spreading of topsoil. » Photograph the area on completion of rehabilitation and on an annual basis thereafter to show vegetation establishment and evaluate progress of restoration over time.
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OBJECTIVE C7: Manage and reduce the impact of invasive vegetation

Within the project area invasive species – indigenous and alien - occur, which all have a potential of reproducing to such an extent that the ecosystem within and beyond the project area could be impaired. Additional alien species grow along major transport routes to the area and thus could be potentially spread there as well.

Project Component/s	<ul style="list-style-type: none"> » Permanent and temporary infrastructure » Access roads
Potential Impact	<ul style="list-style-type: none"> » Impacts on natural vegetation » Impacts on soil » Impact on faunal habitats
Activity/Risk Source	<ul style="list-style-type: none"> » Transport of construction materials to site » Movement of construction machinery and personnel » Site preparation and earthworks causing disturbance to indigenous vegetation » Construction of site access road » Stockpiling of topsoil, subsoil and spoil material » Routine maintenance work – especially vehicle movement
Mitigation: Target/Objective	<ul style="list-style-type: none"> » To significantly reduce the presence of weeds and eradicate alien invasive species » To avoid the introduction of additional alien invasive plants to

	<p>the project control area</p> <ul style="list-style-type: none"> » To avoid further distribution and thickening of existing alien plants on the project area » To complement existing alien plant eradication programs in gradually causing a significant reduction of alien plant species throughout the project control area
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Mitigation: Action/Control	Responsibility	Timeframe
<p>Compile a detailed invasive plant management and monitoring programme as guideline for the entire construction, operational and decommissioning phase</p> <ul style="list-style-type: none"> » This plan must contain WfW-accepted species-specific eradication methods » It must also provide for a continuous monitoring programme to detect new infestations 	Specialist	Pre-construction
<p>Avoid creating conditions in which invasive plants may become established:</p> <ul style="list-style-type: none"> » Keep disturbance of indigenous vegetation to a minimum » Rehabilitate disturbed areas as quickly as possible » Shred all non-seeding material from cleared invasive shrubs and other vegetation an use as mulch as part of the rehabilitation and revegetation plan » Where possible, destroy seeding material of weeds and invasives by piling burning (in designated areas or suitable containers) » Do not import soil from areas with alien plants 	Contractor, monitored by ECO	Construction phase Operational phase
<ul style="list-style-type: none"> » Eradicate all invasive plants that occur within the development's temporary and permanent footprint areas » Ensure that material from invasive plants that can regenerate – seeds, suckers, plant parts are adequately destroyed and not further distributed 	Contractor, monitored by ECO Contractor, monitored by ECO	Construction phase Operational phase
<ul style="list-style-type: none"> » Immediately control any alien plants that become newly established using registered control measures 	Contractor, monitored by ECO	Construction phase Operational phase
<p>Risks from alien invasives do not only arise from invasives present within the footprint area, but also from alien invasives along the verges of the major transport routes, especially invasive grasses and smaller weeds. Similarly, invasives can be spread by construction processes to surrounding areas. To avoid the distribution of weeds and invasive plants, establish a routine amongst contractors/all staff to regularly check:</p> <ul style="list-style-type: none"> » that clothing and shoes are free of mud and seeds 	Contractor, monitored by ECO	Construction phase Operational phase

Mitigation: Action/Control	Responsibility	Timeframe
<ul style="list-style-type: none"> » that foot wells inside vehicles and mats are cleared of weed seed » radiator and grill, along wheel trims, around wheels, mud flaps, undercarriage of vehicle or other moving machinery for mud and seed 		

Performance Indicator	<ul style="list-style-type: none"> » Visible reduction of number and cover of alien invasive plants within the project area. » Improvement of vegetation cover from current dominance of invasive shrubs to dominance of perennial grasses and dwarf shrubs » No establishment of additional alien invasive species.
Monitoring	<ul style="list-style-type: none"> » Ongoing monitoring of area by ECO during construction. » Ongoing monitoring of area by EO during operation » Audit every two to three years by a suitably qualified botanist to assess the status of infestation and success of eradication measures » If new infestations are noted these must be recorded. A comprehensive eradication programme with the assistance of the WfW (Working for Water) Programme is advisable.

OBJECTIVE C8: Appropriate management of the construction site and construction workers

It is expected that all construction staff will reside within existing accommodation in nearby townships. No staff may be accommodated on site. Construction equipment and machinery may need to be stored at an appropriate location on the site for the duration of the construction period, and temporary staff facilities will have to be made available. However, washing and servicing of vehicles on site is not permitted.

Project Component/s	Project components affecting the objective: <ul style="list-style-type: none"> » Construction equipment camps » Facilities for storing, mixing and general handling of materials » Access roads
Potential Impact	<ul style="list-style-type: none"> » Damage to indigenous natural vegetation; » Damage to and/or loss of topsoil; » Initiation of accelerated erosion; » Compacting of ground; and » Pollution of the surrounding environment due to excessive dust, inadequate and/or inappropriate facilities provided or procedures implemented
Activities/Risk Sources	<ul style="list-style-type: none"> » Vegetation clearing and levelling of temporary construction or storage area/s; » Transport to and from the temporary construction or storage

	<p>area/s;</p> <ul style="list-style-type: none"> » Types of materials or equipment and the manner in which they are stored or handled; » Dust emissions
Mitigation: Target/Objective	<ul style="list-style-type: none"> » To minimise impacts on the biophysical environment » To prevent any residual or cumulative impacts arising from temporary construction or storage areas

Mitigation: Action/Control	Responsibility	Timeframe
<ul style="list-style-type: none"> » The location of the construction equipment camp and all access routes will take cognisance of any ecologically sensitive areas identified. » The location of this construction equipment camp shall be approved by the project ECO or the specialist doing the pre-commencement footprint investigation 	Contractor/ECO	Pre-construction
<p>No temporary site camps will be allowed outside the footprint of the development area.</p> <ul style="list-style-type: none"> » To minimise the footprint, temporary storage of equipment and materials on site should be kept at a minimum 	Contractor, monitored by ECO	Construction
<p>As far as possible, minimise natural and semi-natural vegetation clearing for equipment storage areas.</p> <ul style="list-style-type: none"> » Aim to locate the temporary construction camps on already disturbed areas 	Contractor, monitored by ECO	During site establishment
<p>Staff shall be supplied with adequate facilities aimed at preventing any kind of pollution</p> <ul style="list-style-type: none"> » Cooking on open fires must be prohibited, if staff need cooking/kitchen facilities on site, such should be provided by the contractor 	Contractor, monitored by ECO	Construction, Operational phase
<p>Identify and demarcate construction areas, servitudes, and access for general construction work and restrict construction activity to these areas.</p> <ul style="list-style-type: none"> » Prevent unnecessary destructive activity within construction areas (prevent over-excavations and double handling) » Create specific turning points and parking areas for vehicles and heavy machinery as needed » Strictly prohibit any driving outside designated areas and roads » Control dust 	Contractor, ECO to control	Before and during construction, operational phase
<p>To limit the possible distribution of undesirable species and possible pollutants onto site:</p> <ul style="list-style-type: none"> » Regularly check clothing and vehicles for mud and seed and clear in an appropriate manner (see invasive plant management for more details) 	Contractor, ECO to control	Before and during construction, operational phase

Mitigation: Action/Control	Responsibility	Timeframe
<ul style="list-style-type: none"> » Do not wash down any machinery or vehicle within the farm portion, including the footprint area » No vehicles shall be serviced on the affected land portion » All materials moved onto the development site must be free of weeds or any other undesirable organisms or pollutants » It is recommended that fuels, lubricants and other chemicals only be stored on site if absolutely necessary, and then in a manner that prevents any accidental spillage 		
<p>Rehabilitate and re-vegetate all disturbed areas at the construction equipment camp as soon as construction is complete within an area and mitigate erosion where required as per specific management plans</p>	<p>Contractor, rehabilitation contractor, monitored by ECO</p>	<p>Construction, operational phase</p>

<p>Performance Indicator</p>	<ul style="list-style-type: none"> » No visible erosion scars or any pollution once construction in an area is completed » All damaged areas successfully rehabilitated one year after completion » No damage to drainage lines or other types of wetland areas » Appropriate waste management
<p>Monitoring</p>	<ul style="list-style-type: none"> » Regular monitoring and audits of the construction camps and temporary structures on site by the ECO » A photographic record must be established before, during and after mitigation » An incident reporting system should be used to record non-conformances to the EMP, followed by the necessary action from the developer to ensure full compliance

OBJECTIVE C9: Maximise local employment and business opportunities associated with the construction phase

Employment opportunities will be created during the construction phase (i.e. ~300 staff at peak periods of construction), specifically for semi-skilled and unskilled workers. The unemployment rate in the study area is noted to be high and there will therefore be individuals in the area in search of employment. Employment of locals and the involvement of local SMMEs would enhance the social benefits associated with the project, even if the opportunities are only

temporary. The procurement of local goods could furthermore result in positive economic spin-offs.

Project Component/s	Construction and establishment activities associated with the establishment of the solar energy facility, including infrastructure .
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	Employ local labour as far as possible

Mitigation: Action/Control	Responsibility	Timeframe
Where required, implement appropriate training and skills development programmes prior to the initiation of the construction phase.	Developer	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.	Developer	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.	Developer	Database of potential local BEE services providers to be completed before construction phase commences.
Identify potential opportunities for local businesses.	Developer	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.
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	» Skills audit to determine need for training and skills development programme undertaken within 1 month of commencement of construction phase.
Monitoring	» The proponent and or appointed ECO must monitor indicators listed above to ensure that they have been met for the construction phase.

OBJECTIVE C10: Avoid the potential impacts on family structures and social networks associated with presence of construction workers from outside the area

While the presence of construction workers does not in itself constitute a social impact, the manner in which construction workers conduct themselves can impact on the local community. In this regard the most significant negative impact is associated with the disruption of existing family structures and social networks. This risk is linked to the potential behaviour of male construction workers, including an increase in alcohol and drug use, an increase in crime levels, the loss of girlfriends and or wives to construction workers, an increase in teenage and unwanted pregnancies, an increase in prostitution and an increase in sexually transmitted diseases.

The potential risk to local family structures and social networks is, however, likely to be low. The low and semi-skilled workers are likely to be local residents and will therefore form part of the local family and social network.

Project Component/s	Construction and establishment activities associated with the establishment of the solar energy facility, including infrastructure.
Potential Impact	The presence of construction workers who live outside the area and who are housed in local towns can impact on family structures and social networks.
Activities/Risk Sources	The presence of construction workers can impact negatively on family structures and social networks, especially in small, rural communities.
Mitigation: Target/Objective	To avoid and or minimise the potential impact of construction workers on the local community. This can be achieved by maximising the number of locals employed during the construction phase and minimising the number of workers housed on the site.

Mitigation: Action/Control	Responsibility	Timeframe
Ensure that all workers are informed at the outset of the construction phase of the conditions contained in the Code of Conduct. Ensure that construction workers attend a briefing session before activities on site commence. The aim of the briefing session is to inform them of the rules and regulations governing activities on the site as set out in the Code of Conduct.	Contractors	Prior to the commencement of construction
Ensure that all workers are informed at the outset of the construction phase of the conditions contained on the Code of Conduct.	Contractors	Prior to the commencement of construction
Construction workers who are found guilty of breaching the Code of Conduct must follow disciplinary processes in terms of the South African Labour Laws. All dismissals must be in accordance with South African labour legislation.	Contractors	Construction phase
Provide opportunities for workers to travel to their home town at regular intervals or over weekends.	Contractors	Construction phase
Adhere to OHS legal requirements and measures contained in the EMP	Contractors	Construction
Establish and implement OHS procedures for employees on site, including use of Personal Protection Equipment (PPE)	Contractors	Construction

Performance Indicator	<ul style="list-style-type: none"> » Employment policy and tender documents that sets out local employment and targets completed before construction phase commences. » Majority of semi and unskilled labour locally sourced. » Local construction workers employed have proof that they have lived in the area for five years or longer. » Tender documents for contractors include recommendations for construction camp. » Code of Conduct drafted before commencement of construction phase. » Briefing session with construction workers held at outset of construction phase.
» Monitoring	» The proponent and or appointed ECO must monitor indicators listed above to ensure that they have been met for the construction phase.

OBJECTIVE C11: 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 (including PV panels components) 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.

- » Kleinsee can be accessed from the N7 via one of three possible routes (refer to Figure 2.4):
 - * "Kleinsee pad": R355, via Springbok (~97 km). This constitutes the most direct route to Kleinsee from the N7, and the only proclaimed public road to Kleinsee. The segment from Springbok to Buffelsrivier is tarred and provides sole access to the study area communities from Springbok. The segment from Buffelsrivier to Kleinsee is untarred and the road in a relatively bad state;
 - * "Rooipad": Buffelsrivier-Kommagas Road off the R355, linking up with the KDBC Koiingnaas-Kleinsee road south of Kleinsee. The segment from Buffelsrivier to Kommagas is tarred; the portion from Kommagas to the De Beers Consolidated Koingnaas road is a De Beers Consolidated owned gravel road. This Kommagas Road ("rooipad" due to red soils) is preferred by Kleinsee residents and Kleinsee farmers for accessing Springbok;
 - * "Hondeklipbaai pad": Combination of (mainly gravel) roads from Garies (off the N7), via Hondelikpbaai and Koingnaas. This constitutes the most direct road link to the harbours of Cape Town and Saldanha via the N7. Garies is located approximately 176 km south-east of Kleinsee (by road). The De Beers Consolidated owned Kleinsee-Koingnaas segment is the only tarred segment at present. The remainder of the road is essentially only safely negotiable by 4x4 or truck. Tarring of the Garies-Hondeklipbaai segment is envisaged by the Kamiesberg Local Municipality SDF in the medium to long term, but no funds appear to have been allocated.

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, as well as the anticipated intrusion impacts should be clarified with affected parties prior to the commencement of construction activities on site.	Developer	Pre-construction
Source general construction material and goods locally where available to limit transportation over long distances.	Developer and Contractor	Pre-construction and construction
Appropriate dust suppression techniques must be implemented to minimise dust from gravel roads.	Developer	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	Construction
Strict vehicle safety standards should be implemented and monitored.	Developer	Construction
All relevant permits for abnormal loads must be	Contractor (or	Pre-

Mitigation: Action/Control	Responsibility	Timeframe
applied for from the relevant authority.	appointed transportation contractor)	construction
A designated access to the proposed site must be created to ensure safe entry and exit.	Contractor	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	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)	Pre-construction
Any traffic delays because of construction traffic must be co-ordinated with the appropriate authorities.	Contractor	Duration of contract
The movement of all vehicles within the site must be on designated roadways. Signage must be appropriately maintained and placed in areas visible to all road users.	Contractor	Duration of contract
Signage must be established at appropriate points warning of turning traffic and the construction site (all signage to be in accordance with prescribed standards). Signage must be appropriately maintained and placed in areas visible to all road users.	Contractor	Duration of contract
Appropriate maintenance of all vehicles must be ensured.	Contractor	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	Duration of contract
Keep hard road surfaces as narrow as possible.	Contractor	Duration of contract
Signs must be placed along construction roads to identify speed limits, travel restrictions and other standard traffic control information.	Contractor	Duration of contract
<ul style="list-style-type: none"> » Install temporary high visibility advanced warning signs Types W107 and W108 (intersection ahead) on the gravel road both directions prior to construction. » Install permanent high visibility advance warning signs - Types W107 and W108 (Intersection Ahead) - on the gravel road once operation commences » Maintain communication with the Northern Cape Provincial road authority regarding their 	Contractor	Duration of contract

Mitigation: Action/Control	Responsibility	Timeframe
requirements for measures to be instituted		

Performance Indicator	<ul style="list-style-type: none"> » Vehicles keeping to the speed limits within the site and on public roads. » 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 C12: To avoid and or minimise the potential impact of the activities during the construction on the safety of local communities and the potential loss of stock and damage to farm infrastructure

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

Project Component/s	<ul style="list-style-type: none"> » Construction and establishment activities associated with the establishment of the PV facility, including infrastructure .
Potential Impact	<ul style="list-style-type: none"> » Impact on safety of farmers and communities (increased crime) and potential loss of livestock due to stock theft by construction workers and also damage to farm infrastructure, such as gates and fences.
Activities/Risk Sources	<ul style="list-style-type: none"> » The presence of construction workers on the site can pose a potential safety risk to local farmers and communities and may result in stock thefts. The activities of construction workers may also result in damage to farm infrastructure.
Mitigation: Target/Objective	<ul style="list-style-type: none"> » To avoid and or minimise the potential impact on local communities and their livelihoods.

Mitigation: Action/Control	Responsibility	Timeframe
Inform all workers of the conditions contained in the Code of Conduct.	Contractor	Pre-construction

Mitigation: Action/Control	Responsibility	Timeframe
Dismiss all workers that do not adhere to the code of conduct for workers. All dismissals must be in accordance with South African labour legislation	Contractor	Construction
Compensate farmers / community members at full market related replacement cost for <i>proven</i> losses resulting from contractors on the site, which may include livestock loss, damage to infrastructure .	Contractors	Construction phase
Develop & Implement a Health & Safety Plan. Train staff on the H&S Plan	Developer & Contractor	Construction & Operations

Performance Indicator	» All construction workers made aware of Code of Conduct within first week of being employed.1
Monitoring	» The proponent and or appointed ECO must report on the indicators listed above to ensure that they have been met for the construction phase.

OBJECTIVE C13: Management of dust, vehicle emissions and damage to roads

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
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
Maintain communication with Northern Cape Provincial Roads authority regarding their requirements for measures to be instituted regarding use of and impacts on the N7 road.	Developer and Contractor	Duration of Construction
Implement appropriate dust suppression measures for heavy vehicles: » wetting roads on a regular basis » ensuring that vehicles used to transport sand and building materials are fitted with tarpaulins or covers.	Contractors	Duration of Construction
Ensure that all vehicles are road-worthy; drivers are qualified and are made aware of the potential noise, dust and safety issues.	Contractors	Duration of Construction
Ensure that drivers adhere to speed limits within the site and on public roads. Vehicles should be fitted with recorders to record when vehicles exceed the speed limit.	Contractors	Duration of Construction
Ensure that damage to roads attributable to construction activities associated with the PV facility is repaired before completion of construction phase.	Contractors	Duration of Construction
Clearly demarcate construction areas	Contractors	Duration of Construction

Performance Indicator	<ul style="list-style-type: none"> • Dust suppression measures implemented for all heavy vehicles 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"> » The proponent and or appointed ECO must monitor indicators listed above to ensure that they have been met for the construction phase

OBJECTIVE C14: Minimise soil degradation and erosion (Erosion management Plan)

Compacted and/or denuded and disturbed soils are usually prone to surface capping – even more so if the soils are dispersive or have a fine texture due to higher clay or loam contents. Such capped soils are prone to ever increasing

erosion, creating a dysfunctional landscape and ecosystem that rapidly loses soil, nutrients and seeds from the ecosystem.

Naturally occurring herbaceous and dwarf shrub vegetation not only protects the soil surface from direct raindrop impact, but a high portion of biomass in the upper 20 – 50 cm of the soil significantly increases rapid infiltration of rainwater, whilst also binding soil particles and thus preventing erosion. A highly disturbed or reduced vegetation layer will thus naturally be accompanied by higher runoff levels and accelerated erosion, especially during extreme weather events.

The measures below indicate the minimum mitigation that will be required for erosion and storm water control. A more specific erosion management plan will be possible after the final layouts and choice of PV array components are known.

Definitions:

Accelerated soil erosion: Soil erosion induced by human activities and ultimately leading to irreversible degradation of the ecosystem and loss of ecosystem functionality

Project Component/s	<ul style="list-style-type: none"> » PV Array » Grid connection and associated servitudes » Access roads » Workshop, guardhouses, substation and other related infrastructure » Potential topsoil stockpiles and/or borrow pits
Potential Impact	<ul style="list-style-type: none"> » Loss of topsoil and natural resources and biological activity within the topsoil » Loss of natural regeneration potential of soils » Loss of agricultural potential of soils.
Activity/Risk Source	<ul style="list-style-type: none"> » Rainfall and wind erosion of disturbed areas » Excavation, stockpiling and compaction of soil » Concentrated discharge of water from construction activity and new infrastructure » Storm water run-off from sealed, altered or bare surfaces » Construction equipment and vehicle movement on site » Cabling and road construction activities » Power line construction activities » Roadside drainage ditches » Premature abandonment of follow-up monitoring and adaptive management of rehabilitation
Mitigation: Target/Objective	<ul style="list-style-type: none"> » To minimise erosion of soil from site during construction » To minimise deposition of soil into drainage lines » To minimise damage to vegetation by erosion or deposition » To minimise damage to rock, soil, animals and vegetation by construction activity

	<ul style="list-style-type: none"> » No accelerated overland flow related surface erosion as a result of a loss of vegetation cover » No reduction in the surface area of natural drainage lines and other wetland areas as a result of the establishment of infrastructure » Minimal loss of vegetation cover due to construction related activities » No increase in runoff into drainage lines as a result of construction of project related infrastructure » No increase in runoff into drainage lines as a result of road construction
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Mitigation: Action/Control	Responsibility	Timeframe
Identify and demarcate construction areas for general construction work and restrict construction activity to these areas. Prevent unnecessary destructive activity within construction areas (prevent over-excavations and double handling)	Contractor, ECO to control	Before and during construction
New access roads and other servitudes to be carefully planned and constructed to minimise the impacted area and prevent unnecessary excavation, placement, and compaction of soil. Special attention to be given to roads and tracks that cross drainage lines.	Contractor, ECO to control	Before and during construction
Rehabilitate disturbance areas as soon as construction in an area is completed as per the rehabilitation plan.	Contractor, ECO to control	Immediately after construction, monitored during operational phase
<p>General erosion control measures:</p> <ul style="list-style-type: none"> » Runoff control and attenuation can be achieved by using any or a combination of sand bags, logs, silt fences, storm water channels and catch-pits, shade nets, geofabrics, seeding or mulching as needed on and around cleared and disturbed areas <ul style="list-style-type: none"> ○ Ensure that all soil surfaces are protected by vegetation or a covering to avoid the surface being eroded by wind or water. » Ensure that heavy machinery does not compact areas that are not meant to be compacted as this will result in compacted hydrophobic, water repellent soils which increase the erosion potential of the area. » Prevent the concentration or flow of surface water or storm water down cut or fill slopes or along 	Contractor, ECO to control	Construction, operational phase

Mitigation: Action/Control	Responsibility	Timeframe
<p>pipeline routes or roads and ensure measures to prevent erosion are in place prior to construction.</p> <ul style="list-style-type: none"> » Storm water and any runoff generated by hard impervious 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 flows are managed prior to being discharged back into the natural water courses, thus not only preventing erosion, but also supporting the maintenance of natural base flows within these systems, i.e. hydrological regime (water quantity and quality) is maintained. » Mitigate against siltation and sedimentation of wetlands using the above mentioned structures and ensure that no structures cause erosion. » Minimise and restrict site clearing to areas required for construction purposes only and restrict disturbance to adjacent undisturbed natural vegetation. » Vegetation clearing should occur in parallel with the construction progress to minimise erosion and/or run-off. Large tracts of bare soil will either cause dust pollution or quickly erode and then cause sedimentation in the lower portions of the catchment » If implementing dust control measures, prevent over-wetting, saturation, and run-off that may cause erosion and sedimentation » Water course / river crossings should not trap any run-off, thereby creating inundated areas, but allow for free flowing water 		
<p>Control depth of excavations and stability of cut faces/sidewalls</p>	<p>Contractor, to be monitored by ECO</p>	<p>Site establishment & duration of contract</p>
<p>Compile a comprehensive storm water management method statement, as part of the final design of the project and implement during construction and operation.</p>	<p>Developer, Contractor, to be monitored by ECO</p>	<p>Site establishment & duration of contract</p>
<p>Where access roads cross natural drainage lines or wetlands, culverts (or other appropriate measures) must be designed to allow free flow. Regular maintenance must be carried out.</p>	<p>Contractor, ECO to control</p>	<p>Construction phase Operational phase, monitored</p>

Mitigation: Action/Control	Responsibility	Timeframe
		throughout
All vehicles on site must be appropriate to access the site. No off-road driving is permitted unless authorised by the ECO.	Contractor, to be monitored by ECO	Pre-construction, Construction & operation

Performance Indicator	<ul style="list-style-type: none"> » Minimal level of soil erosion around site » Minimal level of increased siltation in drainage lines or pans » Minimal level of soil degradation » Acceptable state of excavations, as determined by EO & ECO » Progressive return of disturbed and rehabilitated areas to the desired end state (Refer also to the Plant Rescue and Rehabilitation Plan)
Monitoring	<ul style="list-style-type: none"> » Fortnightly inspections of the site by ECO » Fortnightly inspections of sediment control devices by ECO » Fortnightly inspections of surroundings, including drainage lines by ECO » Immediate reporting of ineffective sediment control systems » An incident reporting system must record non-conformances according to the EMP.

OBJECTIVE C15: Limit impacts on heritage resources

The Proposed Project Blue Solar Energy Facility will impact several small archaeological sites (artefacts scatters in hollows on top of sand dunes) which would require few hours' worth of mitigation work. Despite limited survey coverage in this area, it is not expected that many more archaeological finds will be present in this area. However, some further mitigation may be required if new sites are found during the walk-down survey.

Project component/s	Any road or other linear construction over and above what is necessary and any spatial extension of other components addressed in this EIA.
Potential Impact	The potential impact if this objective is not met is that wider areas or extended linear developments may result in further destruction, damage, excavation, alteration, removal or collection of heritage objects from their current context on the site.
Activity/risk source	Activities which could impact on achieving this objective include deviation from the planned lay-out of infrastructure without taking heritage impacts into consideration.
Mitigation:	Mitigation measures are not considered necessary. However, a

Target/Objective	facility environmental management plan must take cognizance of heritage resources in the event of any future extensions of any infrastructure.
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Mitigation: Action/control	Responsibility	Timeframe
Should archaeological sites, graves or fossils 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.	Environmental management provider with on-going monitoring role set up by the developer.	Environmental management plan to be in place before commencement of development.
If required, measures must be put in place to prevent vandalism of any archaeological heritage.	Contractor	Construction
The EO must be trained in basic archaeological site identification in order to immediately inform the archaeologist of any chance discovery of archaeological sites or burials. The archaeologist will then implement the required legal steps in terms of the applicable section of the NHRA.	Contractor Specialist	Construction
The Contractor shall make provision for accidental discovery of archaeological sites and graves on the construction site. In the event that any sites found are significant enough to warrant conservation, the Contractor shall ensure that the requirements of SAHRA are fulfilled.	Contractor	Construction
The Contractor shall also prepare the necessary documentation and obtain the permits from the SAHRA to construct through a site which is directly affected by the construction works but is considered to be of low significance. It should be noted that buildings 60 years and older must be assessed and a permit obtained from SAHRA before demolition is considered.	Contractor	Construction
Exclusion of the western-most fringe of the proposed development area	Contractor	Construction
If at any stage during the construction phase any semblance of a fossil were to be observed, it would be vital to recover the fossil and report the occurrence to the geological staff at the closest repository in the Northern Cape (e.g. the McGregor	Contractor	Construction

Mitigation: Action/control	Responsibility	Timeframe
Museum). (053 839-2700) and/or the South African Heritage Resources Agency (SAHRA) (021 642 4502) so that systematic and professional investigation/ excavation can be undertaken.		
If concentrations of archaeological materials are exposed during construction then all work must stop for an archaeologist to investigate.	Contractor	Construction
If any human remains (or any other concentrations of archaeological heritage material) are exposed during construction, all work must cease and it must be reported immediately to the nearest museum/archaeologist or to the South African Heritage Resources Agency, so that a systematic and professional investigation can be undertaken. Sufficient time should be allowed to investigate and to remove/collect such material.	Contractor	Construction

Performance Indicator	Inclusion of further heritage impact consideration in any future extension of infrastructural elements.
Monitoring	Immediate reporting to relevant heritage authorities of any heritage feature discovered during any phase of development or operation of the facility.

OBJECTIVE C16: The mitigation and possible negation of the 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 placement of lay-down areas and temporary construction camps should be carefully considered in order to not negatively influence the future perception of the facility. Secondary visual impacts associated with the construction phase, such as the sight of construction vehicles, dust and construction litter must be managed to reduce visual impacts. The use of dust-suppression techniques on the access roads (where required), timely removal of rubble and litter, and the erection of temporary screening will assist in doing this.

Project Component/s	Construction site
Potential Impact	Visual impact of general construction activities, and the potential scarring of the landscape due to vegetation clearing and resulting erosion.
Activity/Risk Source	The viewing of the above mentioned by observers on or near the site (i.e. within 5 km of the site).
Mitigation: Target/Objective	Minimal visual intrusion by construction activities and intact vegetation cover outside of immediate works areas.

Mitigation: Action/Control	Responsibility	Timeframe
Ensure that vegetation is not unnecessarily cleared or removed during the construction period.	Developer	Pre-construction
Reduce the construction period through careful logistical planning and productive implementation of resources.	Developer	Construction
Plan the placement of lay-down areas and temporary construction equipment camps in order to minimise vegetation clearing (i.e. in already disturbed areas) wherever possible.	Developer	Construction
Restrict the activities and movement of construction workers and vehicles to the immediate construction site and existing access roads.	Developer	Construction
Ensure that rubble, litter, and disused construction materials are appropriately stored (if not removed daily) and then disposed regularly at licensed waste facilities.	Developer	Construction
Reduce and control construction dust through the use of approved dust suppression techniques as and when required (i.e. whenever dust becomes apparent).	Developer	Construction
Restrict construction activities to daylight hours in order to negate or reduce the visual impacts associated with lighting.	Developer	Construction
Rehabilitate all disturbed areas, construction areas, servitudes etc. immediately after the completion of construction works. If necessary, an ecologist should be consulted to assist or give input into rehabilitation specifications.	Developer	Construction

Performance Indicator	Vegetation cover on and in the vicinity of the site is intact (i.e. full cover as per natural vegetation within the environment) with no evidence of degradation or erosion.
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Monitoring	Monitoring of vegetation clearing during construction (by contractor as part of construction contract).
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OBJECTIVE C17: 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). 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 E.

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.

Mitigation: Action/Control	Responsibility	Timeframe
Ensure that sanitation facilities are well managed and used appropriately so as not to pose a health and environmental hazard, waste manifests should be developed for the ablutions showing proof of disposal of sewage at appropriate water treatment works.	Contractor	Duration of contract
Construction method and materials should be carefully considered in view of waste reduction, re-use, and recycling opportunities.	Contractor	Duration of contract
Construction contractors must provide specific detailed waste management plans to deal with all waste	Contractor	Duration of contract

Mitigation: Action/Control	Responsibility	Timeframe
streams.		
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	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).	Contractor	Duration of contract
Disposal of waste must be in accordance with relevant legislative requirements, including the use of licensed contractors.	Contractor	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	Duration of contract
Hydrocarbon and other hazardous waste must be contained and stored in sealed containers within an appropriately bunded area.	Contractor	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	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	Duration of contract
Regularly serviced chemical toilets facilities must be used to ensure appropriate control of sewage, proof . of disposal for this waste needs to be kept on record	Contractor	Duration of contract
Upon the completion of construction, the area must be cleared of potentially polluting materials.	Contractor	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 circumstances may waste be burnt on site.	Contractor	Duration of construction
Where a registered waste site is not available close to the construction site, provide a method statement with regard to waste management.	Contractor	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 EMPr.

OBJECTIVE C18: Appropriate handling and storage of chemicals, hazardous substances

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

Project Component/s	<ul style="list-style-type: none"> » Storage and handling of chemicals, hazardous substances.
Potential Impact	<ul style="list-style-type: none"> » Release of contaminated water from contact with chemicals or hazardous substances. » Generation of contaminated wastes from used chemical or hazardous substances 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, hazardous substances 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 persons.

Mitigation: Action/Control	Responsibility	Timeframe
Spill kits must be made available on-site for the clean-up of spills and leaks of contaminants.	Contractor	Pre-construction

Mitigation: Action/Control	Responsibility	Timeframe
		and implement for 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 halting further contamination, cleaning up the affected environment as much as practically possible and implementing preventive measures.	Contractor	Duration of contract
In the event of a major spill or leak of contaminants, the relevant administering authority must be immediately notified as per the notification of emergencies/incidents.	Contractor	Duration of contract
Cement dust, slurry from cement batching, or spilled cement must be cleaned up as soon as possible and disposed of at a suitably licensed waste disposal site.	Contractor	Duration of contract
Any contaminated/polluted soil removed from the site must be disposed of at a licensed hazardous waste disposal facility.	Contractor	Duration of contract
Routine servicing and maintenance of vehicles must not to take place outside of designated areas on-site (except in the case of emergency). Where repairs of vehicles take place, an appropriate sealed surface and/or drip tray must be used to contain any fuel or oils.	Contractor	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	Duration of contract
Fuel storage areas must be inspected regularly to ensure bund stability, integrity, and function.	Contractor	Duration of contract
Construction machinery must be stored in an appropriately sealed area.	Contractor	Duration of contract
Oily water from bunds at the substations must be removed from site by licensed contractors.	Contractor	Duration of contract
The storage of flammable and combustible liquids such as oils will be in designated areas which are appropriately bunded, and stored in compliance with Material Safety Data Sheets (MSDS) files.	Contractor	Duration of contract
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	Duration of contract

Mitigation: Action/Control	Responsibility	Timeframe
Transport of all hazardous substances must be in accordance with the relevant legislation and regulations	Contractor	Duration of contract
The sediment control and water quality structures used on-site must be monitored and maintained in an operational state at all times.	Contractor	Duration of contract
Upon the completion of construction, the area must be cleared of potentially polluting materials.	Contractor	Duration of contract
Spilled concrete will be allowed to dry and removed as soon as possible. Hardened concrete can either be recycled at a crushing facility or batching plant, disposed of as spoil, or be disposed of at a general waste landfill site as waste. This excludes dry cement powder.	Contractor	Duration of contract

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 EMPr.

OBJECTIVE C19 : 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 .
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.
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Mitigation: Action/Control	Responsibility	Timeframe
No cooking and no open fires allowed on site. This includes no smoking onsite.	Contractor (and sub-contractor/s)	Duration of contract
Provide adequate fire fighting equipment onsite.	Developer and 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 attributable to the construction activities.	Contractors	Duration of construction
Join the local Fire Protection Agency	Developer	Pre-construction

Performance Indicator	<ul style="list-style-type: none"> » Designated areas for fires and smoking identified on site at the outset of the construction phase. » Fire fighting equipment and training provided before the construction phase commences. » Proven compensation claims resolved and settled.
Monitoring	» The developer and/or appointed ECO must monitor indicators listed above to ensure that they have been met for the construction phase.

7.2 Detailing Method Statements

OBJECTIVE C20: 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 EPC Contractor 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 EMPr will be met. That is, the EPC Contractor will be required to describe how specified requirements will be achieved through the submission of written Method Statements to the Owner's Representative and ECO.

The method statements are not written by the ECO since a method statement is a written submission to the ECO and the Owner's Representative by the EPC Contractor in collaboration with his/her EO.

There are two types of method statements, (1) method statements which carryover throughout the project; which is applicable to all activities and, (2) specific method statements used for one task only. The carryover method statements would be method statements pertaining to (waste management, dust control, cement and concrete batching, top soil management, hydrocarbon and emergency spill procedures, alien and invasive plant control, rehabilitation and plant management, erosion management, storage and management of hazardous substances) the specific method statements are specifically related to one activity. This kind of method statements are drawn up at the beginning of each new task.

The Method Statement must cover applicable details with regard to:

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

Method Statements must be compiled for all activities which affect any aspect of the environment and should be applied consistently to all activities. Specific method statements could include:

- » Construction procedures (for example: site clearing, working within watercourses).
- » Materials and equipment to be used.
- » Transporting the equipment to and from the site.
- » How the equipment will be used while on site.
- » How and where the material will be stored.
- » The containment (or action to be taken if containment is not possible) of the leaks or spillages of any liquid or material that may occur.
- » Timing and location of activities.

- » Compliance/Non compliances with the EMPr specifications and any other information that is deemed necessary.
- » Method Statement for Corrective Actions

The Contractor may not commence the activity covered by the Method Statement until it has been approved by the Owner's Representative except in the case of emergency activities and then only with the consent of the Owner's Representative. Approval of the Method Statement will not absolve the Contractor from their obligations or responsibilities in terms of their contract. The content and requirements of Method Statements are to be clearly explained to all plant operators and general workers

The Contractor may not commence the activity covered by the Method Statement until it has been approved by the Owner's Representative except in the case of emergency activities and then only with the consent of the Owner's Representative. Approval of the Method Statement will not absolve the Contractor from their obligations or responsibilities in terms of their contract.

Once a method statement has been submitted it must be evaluated and checked to ensure that all the activities mentioned on the statement are conducted in a manner which ensures environmental compliance. If all the information on the method statement is correct and compliant, the contractor and the EO must sign the statement. Once all the parties have signed the method statements, copies must be made and submitted to all management parties on site, including the ECO and the EO.

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.

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

OBJECTIVE C21: 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 EMPr. The Contractor is responsible for informing

employees and sub-contractors of their environmental obligations in terms of the environmental specifications, and for ensuring that employees are adequately experienced and properly trained in order to execute the works in a manner that will minimise environmental impacts.

The Contractors obligations in this regard include the following:

- » Employees must have a basic understanding of the key environmental features of the construction site and the surrounding environment.
- » Ensuring that a copy of the EMPr is readily available on-site, and that all site staff are aware of the location and have access to the document.
- » Employees will be familiar with the requirements of the EMPr 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 EMPr. This training and awareness will be achieved in the following ways:

7.3.1 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.

7.3.2 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 EMPr and Contract Specifications and the importance and reasons for compliance to these. The induction training must highlight overall do's and don'ts on site and clarify the 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.

7.3.3 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.

7.4 Monitoring Programme: Construction Phase

OBJECTIVE C22: 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 EMPr, but also to monitor any environmental issues and impacts which have not been accounted for in the EMPr that are, or could result in significant

environmental impacts for which corrective action is required. The period and frequency of monitoring will be stipulated by the Environmental Authorisation (once issued). Where this is not clearly dictated, the developer 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 EMPr, 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:

7.4.1 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.

7.4.2 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.

7.4.3 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 (as appropriate) and the requirements of the EMPr.

MANAGEMENT PROGRAMME: REHABILITATION

CHAPTER 8

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.

8.1. Objectives

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

OBJECTIVE R1: Ensure appropriate rehabilitation of disturbed areas such that residual environmental impacts are remediated or curtailed

Immediately after clearing of vegetation, the soil surface must be inspected for signs of erosion and stabilised as soon as possible. After completion of construction, such erosion stabilisation should preferably be with a cover of vegetation. A perennial vegetation cover of at least 30%, preferably more, will be desirable (where it is permissible).

The aim of the first vegetation cover is to form a protective, relatively dense indigenous layer to slow runoff, increase moisture infiltration into the soil, and gradually change the soil nutrient status in order for it to be more favourable for other desirable indigenous vegetation to become established.

The first vegetation layer must be developed further until a desirable end state, as determined during the design phase and taking the original vegetation description as guideline, is established.

Project Component/s	<ul style="list-style-type: none">» PV Array supports and trenching» Grid connection and associated servitudes» Access roads» Workshop, guardhouses, substation and other related infrastructure» Potential topsoil stockpiles and/or borrow pits
Potential Impact	<ul style="list-style-type: none">» Within the footprint, a change of plant species composition with lower productivity and agricultural potential can be expected due to removal, disturbance and continued long-term shading of vegetation

	<ul style="list-style-type: none"> » A largely reduced vegetation cover will cause the ecosystem to be more prone to erosion and irreversible degradation » Disturbance of indigenous vegetation creates opportunities for the establishment of invasive vegetation or creation of surfaces that do not support the permanent (re-) establishment of vegetation » Loss of natural regeneration potential of soils » Loss of agricultural potential of soils.
Activity/Risk Source	<ul style="list-style-type: none"> » Site preparation and earthworks » Excavation of foundations and trenches » Construction of site access road » Power line construction activities » PV array construction activities » Stockpiling of topsoil, subsoil and spoil material.
Mitigation: Target/Objective	<ul style="list-style-type: none"> » Recreate a non-invasive, acceptable vegetation cover that will facilitate the establishment of desirable and/or indigenous species » Prevent and accelerated erosion of ecosystem degradation

Mitigation: Action/Control	Responsibility	Timeframe
Rehabilitation of surface		
Prior to the application of topsoil <ul style="list-style-type: none"> » subsoil shall be shaped and trimmed to blend in with the surrounding landscape or used for erosion mitigation measures » ground surface or shaped subsoil shall be ripped or scarified with a mechanical ripper or by hand to a depth of 15 – 20 cm » compacted soil shall be ripped to a depth greater than 25 cm and the trimmed by hand to prevent re-compacting the soil » any foreign objects, concrete remnants, steel remnants or other objects introduced to the site during the construction process shall be cleared before ripping, or shaping and trimming of any landscapes to be rehabilitated takes place » shaping will be to roughly round off cuts and fills and any other earthworks to stable forms, sympathetic to the natural surrounding landscapes 	Contractor, ECO to control	During and after construction
Application of topsoil <ul style="list-style-type: none"> » topsoils shall be spread evenly over the ripped or trimmed surface, if possible not deeper than the topsoil originally removed » the final prepared surface shall not be smooth but furrowed to follow the natural contours of the land 	Contractor, ECO to control	During and after construction

Mitigation: Action/Control	Responsibility	Timeframe
<ul style="list-style-type: none"> » the final prepared surface shall be free of any pollution or any kind of contamination » care shall be taken to prevent the compaction of topsoil 		
<p>Soil stabilisation</p> <ul style="list-style-type: none"> » mulch, if available from shredded vegetation, shall be applied by hand to achieve a layer of uniform thickness » mulch shall be rotovated into the upper 10 cm layer of soil <ul style="list-style-type: none"> ○ this operation shall not be attempted if the wind strength is such as to remove the mulch before it can be incorporated into the topsoil » measures shall be taken to protect all areas susceptible to erosion by installing temporary and permanent drainage work as soon as possible <ul style="list-style-type: none"> ○ where natural water flow-paths can be identified, subsurface drains or suitable surface drains and chutes need to be installed » additional measures shall be taken to prevent surface water from being concentrated in streams and from scouring slopes, banks or other areas » runnels or erosion channels developing shall be back-filled and restored to a proper condition <ul style="list-style-type: none"> ○ such measures shall be effected immediately before erosion develops at a large scale » where erosion cannot be remedied with available mulch or rocks, geojute or other geotextiles shall be used to curtail erosion 	Contractor, ECO to control	Construction phase Operational phase, followed up until desired end state is reached
Revegetation		
<ul style="list-style-type: none"> » revegetation of the final prepared area is expected to occur spontaneously to some degree where topsoils could be re-applied within 6 months » revegetation will be done according to an approved planting/landscaping plan according to the desirable end states and permissible vegetation 	Contractor, ECO to control	Construction phase Operational phase, followed up until desired end state is reached
<p>Re-seeding</p> <ul style="list-style-type: none"> » revegetation can be increased where necessary by hand- seeding indigenous species <ul style="list-style-type: none"> ○ previously collected and stored seeds shall be sown evenly over the designated areas, 	Contractor, ECO to control	Construction phase Operational phase, followed up

Mitigation: Action/Control	Responsibility	Timeframe
<p>and be covered by means of rakes or other hand tools</p> <ul style="list-style-type: none"> ○ commercially available seed of grass species naturally occurring on site can be used as alternative » re-seeding shall occur at the recommended time to take advantage of the growing season » in the absence of sufficient follow-up rains after seeds started germinating, irrigation of the new vegetation cover until it is established shall become necessary to avoid loss of this vegetative cover and the associated seedbank 		<p>until desired end state is reached</p>
<p>Planting of species</p> <ul style="list-style-type: none"> » the composition of the final acceptable vegetation will be based on the vegetation descriptions of the original ecological EIA investigation, and will include rescued plant material » geophytic plants shall be planted in groups or as features in selected areas » during transplanting care shall be taken to limit or prevent damage to roots » plants should be watered immediately after transplanting to help bind soil particles to the roots (or soil-ball around rooted plants) and so facilitate the new growth and functioning of roots 	<p>Contractor, ECO to control</p>	<p>Construction phase Operational phase, followed up until desired end state is reached</p>
<p>Traffic on revegetated areas</p> <ul style="list-style-type: none"> » designated tracks shall be created for pedestrian of vehicle traffic where necessary » Disturbance of vegetation and topsoil must be kept to a practical minimum, no unauthorised off road driving will be allowed 	<p>Contractor, ECO to control</p>	<p>Construction phase Operational phase</p>
<p>Establishment</p> <ul style="list-style-type: none"> » The establishment and new growth of revegetated and replanted species shall be closely monitored <ul style="list-style-type: none"> ○ Where necessary, reseeding or replanting will have to be done if no acceptable plant cover has been created 	<p>Contractor, ECO to control</p>	<p>Construction phase Operational phase, followed up until desired end state is reached</p>
<p>Monitoring and follow-up treatments</p>		
<p>Monitor success of rehabilitation and revegetation and take remedial actions as needed according to the respective plan</p>	<p>ECO during construction, suitable</p>	<p>Construction phase Operational</p>

Mitigation: Action/Control	Responsibility	Timeframe
<ul style="list-style-type: none"> » Erosion shall be monitored at all times and measures taken as soon as detected » Where necessary, reseeded or replanting will have to be done if no acceptable plant cover has been created 	designated person / contractor after that	phase
<p>Weeding</p> <ul style="list-style-type: none"> » It can be anticipated that invasive species and weeds will germinate on rehabilitated soils <ul style="list-style-type: none"> ○ These need to be hand-pulled before they are fully established and/or reaching a mature stage where they can regenerate ○ Where invasive shrubs re-grow, they will have to be eradicated according to the Working for Water specifications 	Contractor	Construction phase Operational phase

<p>Performance Indicator</p>	<ul style="list-style-type: none"> » Natural configuration of habitats as part of ecosystems or recreated, thus ensuring a diverse but stable hydrology, substrate and general environment for species to be able to become established and persist » The structural integrity and diversity of natural plant communities is recreated or maintained » Indigenous biodiversity continually improves according to the pre-determined desirable end state <ul style="list-style-type: none"> ○ This end state, if healthy, will be dynamic and able to recover by itself after occasional natural disturbances without returning to a degraded state » Ecosystem function of natural landscapes and their associated vegetation is improved or maintained
<p>Monitoring</p>	<ul style="list-style-type: none"> » Fortnightly inspections of the site by ECO during construction » An incident reporting system must record non-conformances to the EMP. » Quarterly inspections and monitoring of the site by the ECO or personnel designated to the rehabilitation process until 80% of the desired plant species have become established <ul style="list-style-type: none"> ○ These inspections should be according to the monitoring protocol set out in the rehabilitation plan » Thereafter annual inspections according to the minimal monitoring protocol

MANAGEMENT PROGRAMME: OPERATION

CHAPTER 9

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 properly 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 EMPr.

9.1. Objectives

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

OBJECTIVE OP1: Protection of indigenous natural vegetation, fauna and maintenance of rehabilitation

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.
Potential Impact	<ul style="list-style-type: none">» Disturbance to or loss of vegetation and/or habitat.

	<ul style="list-style-type: none"> » Environmental integrity of site undermined resulting in reduced visual aesthetics, erosion, compromised land capability and the requirement for on-going management intervention.
Activity/Risk Source	<ul style="list-style-type: none"> » Movement of employee vehicles within and around site. » Excessive shading by PV panels. » Altered rainfall interception and resultant runoff patterns by infrastructure.
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
Vehicle movements must be restricted to designated roadways.	Operator	Operation
No disturbance of vegetation outside of the project site must occur.	Operator	Operation
Existing roads must be maintained to ensure limited erosion and impact on areas adjacent to roadways.	Operator	Operation
An on-going invasive and alien plant monitoring and eradication programme must be implemented, where necessary (refer to Appendix B).	Operator	Operation
A botanist familiar with the vegetation of the area should monitor the rehabilitation success and alien plant removal on an annual basis.	Operator in consultation with Specialist	Annual monitoring until successful re-establishment of vegetation in an area
<p>All cable trenches, excavations, , through sensitive areas should be excavated carefully in order to minimise damage to surrounding areas and biodiversity.</p> <ul style="list-style-type: none"> » The trenches must be checked on a daily basis for the presence of trapped animals. » Any animals found must be removed in a safe manner, unharmed, and placed in an area where the animal will be comfortable. » If the ECO or contractor is unable to assist in the movement of a fauna species, ensure a member of the conservation authorities assists with the translocation. » All mammal, large reptiles and avifauna species found injured during construction will be taken to a suitably qualified veterinarian or rehabilitation centre to either be put down in a 	Contractor / ECO	Operation

Mitigation: Action/Control	Responsibility	Timeframe
humane manner or cared for until it can be released again		
A botanist familiar with the vegetation of the area should monitor the vegetation composition and – density immediately adjacent to new infrastructure and decide on additional revegetation measures that may be required to maintain sufficient vegetation to prevent habitat degradation and accelerated erosion, especially underneath/around PV panels.	Operator in consultation with Specialist	Annual monitoring until successful re-establishment of vegetation in an area

Performance Indicator	<ul style="list-style-type: none"> » No further disturbance to vegetation or terrestrial faunal habitats. » Continued improvement of rehabilitation efforts. » No disturbance of vegetation outside of project site. » No further thickening of invasive shrubs on site. » Gradual disappearance of all alien plant species on site.
Monitoring	<ul style="list-style-type: none"> » Observation of vegetation on-site by facility manager and environmental manager. » Regular inspections to monitor plant regrowth/performance of rehabilitation efforts and weed infestation compared to natural/undisturbed areas.

OBJECTIVE OP2: Manage and reduce the impact of invasive vegetation

Within the project area invasive species – indigenous and alien - occur, which all have a potential of reproducing to such an extent that the ecosystem within and beyond the project area could be impaired. Additional alien species grow along major transport routes to the area and thus could be potentially spread there as well.

It can be expected that more species may be added after the pre-commencement walk-through survey. A detailed Invasive Management Plan need to be drafted after this walk-through. Operational standards must adhere to those set out by Working for Water (Appendix B). The use of chemicals may only commence with the approval of the relevant authorities.

Project Component/s	<ul style="list-style-type: none"> » PV Array » Grid connection and associated servitudes » Temporary construction camps » Workshops and/or other permanent infrastructure » Access roads
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Potential Impact	<ul style="list-style-type: none"> » Impacts on natural vegetation. » Impacts on soil. » Impact on faunal habitats. » Loss of agricultural potential.
Activity/Risk Source	<ul style="list-style-type: none"> » Transport of construction materials. » Movement of construction machinery and personnel. » Site preparation and earthworks causing disturbance to indigenous vegetation. » Construction of site access road. » Stockpiling of topsoil, subsoil and spoil material.
Mitigation: Target/Objective	<ul style="list-style-type: none"> » To avoid the introduction of additional alien invasive plants to the project control area. » To avoid further distribution and thickening of existing alien plants on the project area. » To complement existing alien plant eradication programs in gradually causing a significant reduction of alien plant species throughout the project control area.

Mitigation: Action/Control	Responsibility	Timeframe
Compile a detailed invasive plant management and monitoring programme as guideline for the entire construction, operational and decommissioning phase. This plan must contain WfW-accepted species- specific eradication methods. It must also provide for a continuous monitoring programme to detect new infestations	Specialist	Pre-construction
Avoid creating conditions in which invasive 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 » Shred all non-seeding material from cleared invasive shrubs and other vegetation an use as mulch as part of the rehabilitation and revegetation plan » Do not import soil from areas with alien plants 	Operator	Construction phase Operational phase
<ul style="list-style-type: none"> » Eradicate all invasive plants that occur within the development's temporary and permanent footprint areas » Ensure that material from invasive plants that can regenerate – seeds, suckers, plant parts are adequately destroyed and not further distributed 	Operator	Construction phase Operational phase
<ul style="list-style-type: none"> » Immediately control any alien plants that become newly established using registered control measures 	Operator	Construction phase Operational phase

Performance Indicator	<ul style="list-style-type: none"> » Visible reduction of number and cover of alien invasive plants within the project area. » Improvement of vegetation cover from current dominance of invasive shrubs to dominance of perennial grasses and dwarf shrubs » No establishment of additional alien invasive species.
Monitoring	<ul style="list-style-type: none"> » Ongoing monitoring of area by the environmental manager during operation » Audit every two to three years by a suitably qualified botanist to assess the status of infestation and success of eradication measures » If new infestations are noted these must be recorded. A comprehensive eradication programme with the assistance of the WfW (Working for Water) Programme is advisable.

OBJECTIVE OP3: The mitigation and possible negation of visual impacts associated with the decommissioning of Project Blue Solar Energy Facility

Project Component/s	The solar energy facility and ancillary infrastructure (i.e. panels, access roads, substation, workshop and power line).
Potential Impact	Visual impact of facility degradation and vegetation rehabilitation failure.
Activity/Risk Source	The viewing of the above mentioned by observers on or near the site (i.e. within 5 km of the site).
Mitigation: Target/Objective	Well maintained and neat facility.

Mitigation: Action/Control	Responsibility	Timeframe
Maintain the general appearance of the facility as a whole, including the PV panel area, the internal roads, servitudes and the ancillary buildings.	Operator	Throughout operational phase
Maintain roads to forego erosion and to suppress dust.	Operator	Throughout operational phase
Monitor rehabilitated areas, and implement remedial action as and when required.	Operator	Throughout operational phase

Performance Indicator	Well maintained and neat facility with intact vegetation on and in the vicinity of the facility.
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Monitoring	Monitoring of the entire site on an ongoing basis (by operator).
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OBJECTIVE OP4: 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 (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 deposition of soil into drainage systems. » Increased run-off over the site.
Activities/Risk Sources	<ul style="list-style-type: none"> » Poor rehabilitation and/or revegetation of cleared areas. » Rainfall - water erosion of disturbed areas. » Wind erosion of disturbed areas. » Concentrated discharge of water from construction activity.
Mitigation: Target/Objective	<ul style="list-style-type: none"> » Ensure rehabilitation of disturbed areas is maintained. » Minimise soil degradation (i.e. wetting). » Minimise soil erosion and deposition of soil into drainage lines. » Ensure continued stability of embankments/excavations.

Mitigation: Action/Control	Responsibility	Timeframe
Rehabilitate disturbance areas should the previous attempt be unsuccessful.	Operator	Operation
Maintain erosion control measures implemented during the construction phase (i.e. run-off attenuation on slopes, bags, logs), silt fences, storm water catch-pits, and shade nets).	Operator	Operation
Develop and implement an appropriate stormwater management plan for the operational phase of the facility	Operator	Operation

Performance Indicator	<ul style="list-style-type: none"> » Acceptable level of soil erosion around site, as determined by the environmental manager. » Acceptable level of increased siltation in drainage lines, as determined by the site manager.
Monitoring	<ul style="list-style-type: none"> » Inspections of site on a bi-annual basis by the operation phase ECO

OBJECTIVE OP5: 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	<ul style="list-style-type: none"> » Operation and maintenance of the solar energy facility and associated infrastructure.
Potential Impact	<ul style="list-style-type: none"> » 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	<ul style="list-style-type: none"> » The presence of operation and maintenance personnel and their activities on the site can increase the risk of veld fires.
Mitigation: Target/Objective	<ul style="list-style-type: none"> » 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.	Operator	Operation
Provide adequate fire fighting equipment at specified localities on the PV facility to meet emergencies from fire.	Operator	Operation
Provide adequate fire fighting equipment on site.	Operator	Operation
Provide fire-fighting training to selected operation and	Operator	Operation

Mitigation: Action/Control	Responsibility	Timeframe
maintenance staff.		
Ensure that appropriate communication channels are established to be implemented in the event of a fire.	Operator	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).	Operator	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 users in the case of an emergency.	Operator	Operation
Contact details of emergency services should be prominently displayed on site.	Operator	Operation

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

OBJECTIVE OP6: Maximise local employment and business opportunities associated with the operational phase

The facility is expected to be operational for 25 – 30 years during which time approximately 30 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	» Day to day operational activities associated with the PV facility, including maintenance .
Potential Impact	» The opportunities and benefits associated with the creation of

	local employment and business should be maximised
Activities/Risk Sources	» The operational phase of the PV facility will create up to 15 full time employment opportunities.
Mitigation: Target/Objective	» 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 staff is likely to be based in the region. The developer should commit to implementing a training and skills development and training programme to maximise employment for locals.	Operator	Prior to commencement of operation
Identify local members of the community who are suitably qualified or who have the potential to be employed full time.	Operator	Prior to commencement of operation

Performance Indicator	» Training and skills development programme developed and designed before construction phase completed. » Potential locals identified before construction phase completed.
Monitoring	» The developer must monitor indicators listed above to ensure that they have been met for the operational phase.

OBJECTIVE OP7: Appropriate handling and management of waste

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 includes general solid waste, and liquid waste. A guideline for integrated management of waste is included as Appendix E of this EMPr.

Project Component/s	» Substation. » Operation and maintenance staff. » Workshop.
Potential Impact	» 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	» 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. » 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) must be stored in sealed containers within a clearly demarcated designated area.	Operator	Operation
Storage areas for hazardous substances must be appropriately sealed and bunded.	Operator	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.	Operator	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.	Operator	Operation and maintenance
Spill kits must be made available on-site for the clean-up of spills and leaks of contaminants.	Operator	Operation and maintenance
Disposal of waste must be in accordance with relevant legislative requirements, including the use of licensed contractors.	Operator / waste management contractor	Operation
Waste handling, collection, and disposal operations must be managed and controlled by a waste management contractor.	Operator/ waste management contractor	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 	Operator	Operation
General waste must be recycled where possible or disposed of at an appropriately licensed landfill.	Operator	Operation
Hazardous waste (including hydrocarbons) and general waste must be stored and disposed of separately.	Operator	Operation

Mitigation: Action/Control	Responsibility	Timeframe
Disposal of waste must be in accordance with relevant legislative requirements, including the use of licensed contractors.	Operator	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 environmental manager . » All appropriate waste disposal certificates accompany the monthly reports.

OBJECTIVE OP8: To avoid and or minimise the potential impacts of safety, noise and dust and damage to roads during the operational phase

Project Component/s	» Construction and establishment activities associated with the establishment of the PV facility, including infrastructure .
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
Establish and maintain a register for their periodic review that logs all complaints raised by the landowner, occupiers or the general public about operational activities. The register shall	Operator	Operational Life of Facility

Mitigation: Action/Control	Responsibility	Timeframe
be regularly updated and records maintained, including the name of the complainant, his or her domicile and contact details, the date and nature of the complaint and if any action that was taken to rectify the problem.		
Institute and maintain security and access control to the site	Operator	Operational Life of Facility
Set up signage warning of on-site hazards	Operator	Operational Life of Facility
Conduct regular technical inspections and site maintenance activities.	Operator	Operational Life of Facility
maintain security fencing on the perimeter and around electrical substations	Operator	Operational Life of Facility
Develop and implement emergency response procedures and carry out regular review of emergency response procedures	Operator	Operational Life of Facility

OBJECTIVE OP9: To avoid and or minimise the potential impacts due to cleaning of the PV panels using water

In certain instances, water is also used for cleaning the panels to remove dust or dirt that builds up on the panels.

Project Component/s	» Cleaning PV panels with water
Potential Impact	» Run-Off, erosion / sedimentation
Activities/Risk Sources	» Cleaning PV panels with water
Mitigation: Target/Objective	» No negative impacts due to use of water for cleaning panels

Mitigation: Action/Control	Responsibility	Timeframe
Use as little water as possible for cleaning the panels	Operator	Operational Life of the facility
Confirm a legal source of water prior to the operational phase of the project and obtain any required water use license	Operator	Operational Life of the facility
Regular inspection during cleaning events to monitor use of water	Operator	Operational Life of the facility

Mitigation: Action/Control	Responsibility	Timeframe
Re-use grey water if possible	Operator	Operational Life of the facility

OBJECTIVE OP10: To avoid and or minimise the potential impacts of the power line during maintenance events

The expected lifespan of the proposed power line is approximately 40 years, depending on the maintenance undertaken on the power line structures. During the life-span power line, on-going maintenance is performed. Power line inspections are undertaken on an average of 1 – 2 times per year, depending on the area. During this maintenance period, the line is accessed via the access routes established during the construction phase. Maintenance of the power line is required to be undertaken in accordance with the specifications of this EMPr.

The management of power line servitude is dependent on the details and conditions of the agreement between the project development company, the landowner and Eskom, and are therefore site-specific. These may, therefore, vary from one location to another. However, it is a common occurrence that there is a dual responsibility for the maintenance of the servitude:

- » Eskom will be responsible for the tower structures, maintenance of access roads, watercourse crossings, and gates and fences relating to servitude access.
- » The landowner will retain responsibility for the maintenance of the land and land use within the servitude (e.g. cropping activities, veld management, .).

Exceptions to the above may arise where, for example dual use is made of the access roads and gates or specific land use limitations are set by Eskom within the servitude which directly affects the landowner. Maintenance responsibilities are, ultimately, clearly set out in the servitude agreement. Once agreed upon, these maintenance agreement conditions must be deemed to form part of this EMPr and must be adhered to at all times.

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	» Power Line Servitude
Potential Impact	» Disturbance to or loss of fauna and/or habitat » Increased erosion
Activity/risk source	» Management of power lines servitude area
Mitigation: Target/Objective	» To minimise disturbance of natural vegetation/habitats within the servitude » To minimise erosion

Mitigation: Action/control	Responsibility	Timeframe
Utilise existing access roads as far as possible	Operator (Eskom) and maintenance contractors	Operations & Maintenance
Clear servitude of alien vegetation along power line servitude and implement an appropriate alien plant management plan.	Operator (Eskom) and maintenance contractors	Operations & Maintenance
Implement appropriate erosion management measures within the servitude area. The servitude and its access route must be monitored for signs of erosion, and signs of erosion remedied immediately	Operator (Eskom) and maintenance contractors	Operations & Maintenance
Maintain erosion control measures implemented during the construction phase (i.e. run-off attenuation on slopes (sand bags, logs), silt fences, storm water catch-pits, and shade nets	Operator (Eskom) Operator	Operations
<ul style="list-style-type: none"> » Marking power lines appropriately (with bird flight diverters) to increase visibility to birds. » Minimising length of power lines as much as possible. » Ensuring power lines are properly insulated and bird friendly prior to installation. » Responding rapidly to high risk sections of power lines where collision mortalities are high. 	Operator (Eskom) /Developer	Operations & Maintenance
» For vegetation clearance/trimming (e.g. protected plants and trees), a permit must be obtained all relevant permits	Developer	Operations & Maintenance

Performance Indicator	» Limited disturbance to natural vegetation/habitats within the servitude area
Monitoring	<ul style="list-style-type: none"> » Annual monitoring must be carried out together with monitoring of the remainder of the development to detect and eradicate new infestations of alien plant species before they become well established and may spread » Monitoring of erosion within servitude.

MANAGEMENT PROGRAMME: DECOMMISSIONING

CHAPTER 10

The solar infrastructure which will be utilised for the proposed solar energy facility is expected to have a lifespan of 20 – 25 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 section 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.

10.1. 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.

10.2 Disassemble Infrastructure

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

OBJECTIVE D1: 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 . However, the number of people affected 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
Explore options of re-use and recycling of the PV facility components/ structures. This will be informed by legislative requirements, environmental analyses and costs at the time.	Developer	Prior to decommissioning
Where disposal of components and materials is required, this must be appropriately carried out in accordance with prevailing legal requirements, in designated waste disposal facilities.	Developer	When PV facility is decommissioned
Retrenchments should comply with South African Labour legislation of the day	Developer	When PV facility is decommissioned
Undertake site rehabilitation to restore the environment to a condition whereby the natural functioning of the ecosystem can take place	Developer	When PV facility is decommissioned
If scarring of the landscape/ site occurs, utilised landscaping to restore the site	Developer	When PV facility is decommissioned
Re-vegetate disturbed areas utilising indigenous plant species.	Developer	When PV facility is decommissioned
Correct salvage, disposal and preferably also recycling of PV panels	Developer and relevant waste management specialist	When PV facility is decommissioned

Performance Indicator	» South African Labour legislation relevant at the time » Area appropriately rehabilitated.
Monitoring	» Monitoring of decommissions activities

FINALISATION OF THE EMPr

CHAPTER 11

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

**APPENDIX A:
GRIEVANCE MECHANISM / PROCESS**

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.

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.

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:
METHODS FOR ALIEN SPECIES REMOVAL**

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 used 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	RESPONSIBLE PERSON OR UNIT	
	PROJECT MANAGER	PM
	CONTRACTOR/COMMUNITY WORKER	C
	ENVIRONMENTAL CONTROL OFFICER / COMMUNITY LIASION OFFICER	ECO
	TRAINING UNIT	TU
	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

o Floor area covered suitable absorbent material	C
o Bucket & spade must be available in case of spills	C
o 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"> <ul style="list-style-type: none"> ○ Red list data species (none recorded) 	C
<ul style="list-style-type: none"> <ul style="list-style-type: none"> ○ Protected plants (see species of conservation concern) 	C
<ul style="list-style-type: none"> <ul style="list-style-type: none"> ○ Sensitive communities (wetlands only, no other recorded on project area) 	C
<ul style="list-style-type: none"> <ul style="list-style-type: none"> ○ 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. 	<p>PM, C</p>
<p>9.3. Training Plan & Profiles</p>	
<ul style="list-style-type: none"> The Training Annual Plan of Operations must be displayed. 	<p>PM</p>
<ul style="list-style-type: none"> The plan must be based on the WFW training matrix and policy. 	<p>TU, PM</p>
<p>9.4. Training Records</p>	
<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. 	<p>TU, PM</p>
<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. 	<p>TU</p>
<p>9.5. Accreditation</p>	
<ul style="list-style-type: none"> All training must be aligned to unit standards, where possible. 	<p>TU</p>
<ul style="list-style-type: none"> All training must be provided by accredited training providers, where possible. 	<p>TU</p>
<p>Performance Indicator</p>	<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
<p>Monitoring</p>	<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:
PRINCIPLE FOR EROSION MANAGEMENT**

PRINCIPLES FOR EROSION 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 laid/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

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**APPENDIX D:
PRINCIPLES FOR PLANT SEARCH AND RESCUE**

PRINCIPLES FOR PLANT SEARCH & RESCUE PLAN

August 2014

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1. Purpose

The Plant Search & Rescue Plan addresses the protocols for the removal, temporary storage and replanting of plant species of conservation concern. The objective of rescuing plants on the project area is:

- » Preventing the loss of species either directly or through future extinction debts and minimising impacts of development on population dynamics of species of conservation concern.
- » Preserving the natural configuration of habitats as part of ecosystems, thus ensuring a diverse but stable hydrology, substrate and general environment for species to be able to become established and persist.

2. Legislation and Standards

Relevant legislation:

- » Conservation of Agricultural Resources Act 43 of 1983
- » Environment Conservation Act 73 of 1989
- » National Forests Act 84 of 1998
- » National Environmental Management Act 107 of 1998
- » National Environmental Management: Biodiversity Act
- » Northern Cape Nature Conservation Ordinance

3. Plant Search and Rescue

Several red-listed and protected species were recorded within the wind energy facility development site. Red listed species are listed as declining, endangered, or protected provincially and internationally (*CITES: Convention on the Trade in Endangered Species of Wild Fauna and Flora*).

Where protected plants cannot be avoided, these plants should be extracted from the soil and their storage tubers re-planted in similar habitats where they should be able to resprout and flourish again. It is, however, only realistic to assume that not all plants can be salvaged, either due to difficulty in removing and transplanting them, or simply because of the sheer numbers of plants present. The developer will thus have to apply for the necessary harvesting (destruction) permits from the authorities for the destruction of these plants.

General Principles - Plant rescue and protection

Prior to construction, once all the areas where topsoil will be removed or areas will be transformed have been demarcated, a thorough plant Search and Rescue (S&R) program must be undertaken by a horticulturist with appropriate Search and Rescue experience in order to remove all species of conservation concern that can be transplanted – e.g. geophytes or small succulents. All rescued species should be

bagged (and cuttings taken where appropriate) and kept in an on-site shade nursery (if water can be provided; otherwise off site) and should be returned to site once all construction is completed and rehabilitation of disturbed areas is required.

Successful plant rescue can only be achieved if:

- » Species can be removed from their original habitat with minimal damage to the plant, especially the roots.
- » All plants removed are safely stored and treated according to their specific requirements prior to being transplanted again.
- » They are relocated into a suitable habitat and protected from further damage and all disturbances to aid their re-establishment.
- » Timing of planting activities is planned with the onset of the growing season.
- » Steps are taken where necessary to aid the initial establishment of vegetation, including occasional watering.

The Contractor must take all reasonable measures to ensure that plant species of conservation concern are rescued and survive indefinitely. The following operational standards are recommended.

Project component/s	<ul style="list-style-type: none"> » Solar facility » Access roads and cabling between and to turbine units » Power line » Sealed surfaces (e.g. roofs, concrete surfaces, compacted road surfaces, paved roads / areas) » Substation » All other infrastructure
Potential Impact	<ul style="list-style-type: none"> » Loss of species of conservation concern
Activities/risk sources	<ul style="list-style-type: none"> » Excavation, stockpiling and compaction of soil » Mobile construction equipment movement on site » Cabling and access roads construction activities » Power line construction activities » Project related infrastructure
Mitigation: Target/ Objective	<ul style="list-style-type: none"> » To minimise loss of plant species of conservation concern

Mitigation: Action/control	Responsibility	Timeframe
Plant Rescue and indigenous plant materials		
All harvested plant materials shall be labelled with <ul style="list-style-type: none"> » Genus as minimum, species if known » Habitat from which materials were collected 	Horticulturalist ECO	Prior to construction
Indigenous plant materials for re-vegetation: <ul style="list-style-type: none"> » All plant material shall be obtained from the search-and- 	Contractor in collaboration	Before, during and

Mitigation: Action/control	Responsibility	Timeframe
<p>rescue operation on the site prior to clearing or from local nurseries or reputable seed providers</p> <ul style="list-style-type: none"> » Indigenous materials shall only be removed from their habitat with the necessary permits whenever applicable » Each plant removed shall be handled, packed and stored in a manner suitable for that species » Removed plants shall be protected from windburn or other damage during transportation » No plants or plants with exposed roots shall be subjected to excessive exposure to drying winds and sun, or subjected to water logging » All plants shall be kept free from plant diseases and pests and protected from rodents or other damaging agents » All indigenous plants that have been removed prior to clearing shall be returned to conditions resembling their original habitat as close as practically possible 	with ECO	after construction
<p>Site-specific nursery</p> <ul style="list-style-type: none"> » On-site nursery facilities shall be erected for the holding of rescued plant material and the propagation of appropriate species for re-vegetation » Where nursery facilities can only cater for rescued plants, a suitable (local) nursery shall be identified that will be willing to receive seeds collected and propagate the necessary species for later revegetation » The area where plants are stored shall be kept free of weeds » Plants stored in the designated area shall be protected from rodents, excessive sun and wind, and inspected regularly until being planted for pathogens and pests, and then treated accordingly » The nursery shall be adequately secured to prevent loss or theft of species 	Contractor, ECO to control	Prior to construction
<p>Protected flora</p> <ul style="list-style-type: none"> » Ensure that no indigenous protected flora is removed from its original habitat in the project area without appropriate consents from the relevant authorities 	ECO	Before, during and after construction

Performance Indicator	» Search and Rescue completed prior to the commencement of construction in an area.
Monitoring	» Monitoring of above actions by the ECO.

APPENDIX: TRANSPLANTING GUIDELINES FOR PLANTS WITH UNDERGROUND STORAGE ORGANS

Many of the plants in harsh environments have underground storage organs from which they resprout every year after sufficient rains, flower and then die back soon after fruiting and remain dormant, out of sight until the next growing season.

Root system: underground storage organs are variable in size, but usually between 15 and 40 cm deep in the soil

Transplanting: success of transplanting is usually very high IF handled correctly

Rescue 101: Plants should be lifted and transplanted after flowering and fruiting, preferably as the leaves start to die back. For lifting, loosen the soil or wedge apart rocks working from a circle of about 20 cm away from the base of the plant, working inwards but not closer than about 5 cm of the plant with a sharp narrow object such as a koevoet. Once the soil is loosened, gently feel by hand where the bulb, corm, or other storage organ is, and wedge out by hand, taking care not to damage it. Remove loose soil, gently cleanse off most of remaining soil, or rinse off the storage organ. Group these according to species and label clearly, keep records of labels to include name if that is known, or a brief description or photo, also the average depth of the organs when they were removed, and the habitat they were removed from. Spread these plants so that the storage organ can dry completely, and then loosely pack into newspaper or paper bag and then store in a shaded, dry position for maximally 3 months. Transplant into soil that is as similar as possible to the original habitat, **TAKING CARE** that the growing point of the organ points to the top, else the plant will die. Make sure the storage organs are positioned according to the records kept about original depth of the storage organ.

Aftercare: Firm down soil around the base of the plant once it is in a new position. Allow plant to resprout naturally after sufficient rains, do not water. As these plants may not be visible for a while, clearly demarcate the area where these have been planted to avoid disturbing and potentially destroying them later on.

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

GUIDELINE FOR INTEGRATED MANAGEMENT OF CONSTRUCTION WASTE

Waste is defined in the National Environmental Management: Waste Act (Act No 59 of 2008) as follows:

"any substance, whether or not that substance can be reduced, re-used, recycled and recovered:

- (a) that is surplus, unwanted, rejected, discarded, abandoned or disposed of;*
- (b) which the generator has no further use of for (he purposes of production;*
- (c) that must be treated or disposed of; or*
- (d) that is identified as a waste by the Minister by notice in the Gazette,*

and includes waste generated by the mining, medical or other sector, but—

- (i) a by-product is not considered waste; and*
- (ii) any portion of waste, once re-used, recycled and recovered, ceases to be waste"*

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>

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