
PROPOSED LETHABO PV SOLAR ENERGY FACILITY NEAR SASOLBURG, FREE STATE PROVINCE

ENVIRONMENTAL MANAGEMENT PROGRAMME

DEA REFERENCE: 14/12/16/3/3/2/753

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DEFINITIONS AND TERMINOLOGY

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

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

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

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

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.

Decommissioning: To take out of active service permanently or dismantle partly or wholly, or closure of a facility to the extent that it cannot be readily re-commissioned. This usually occurs at the end of the life of a facility.

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.

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

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

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

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

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

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

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 ongoing maintenance after implementation.

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

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

Hazardous waste: Any waste that contains organic or inorganic elements or compounds that may, owing to the inherent physical, chemical or toxicological characteristics of that waste, have a detrimental impact on health and the environment.

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

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

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

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

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

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

Pre-construction: The period prior to the commencement of construction, which may include activities which do not require Environmental Authorisation (e.g. geotechnical surveys).

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

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

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

Waste: Any substance, material or object, that is unwanted, rejected, abandoned, discarded or disposed of, or required to be discarded or disposed of, by the holder of that substance, material or object, whether or not such substance, material or object can be re-used, recycled or recovered and includes all wastes as defined in Schedule 3 of the NEM WA; or any other substance, material or object that is not included in Schedule 3 of the NEM WA that may be defined as a waste by that is identified as waste by the Minister of Environmental Affairs (by notice in the Gazette). Any waste or portion of waste, referred to in the section above, ceases to be a waste:

- (i) once an application for its re-use, recycling or recovery has been approved or, after such approval, once it is, or has been re-used, recycled or recovered;
- (ii) where approval is not required, once a waste is, or has been re-used, recycled or recovered;
- (iii) where the Minister of Environmental Affairs has, in terms of Section 74 of the NEM WA, exempted any waste or a portion of waste generated by a particular process from the definition of waste; or
- (iv) where the Minister of Environmental Affairs has, in the prescribed manner, excluded any waste stream or a portion of a waste stream from the definition of waste

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INTRODUCTION

CHAPTER 1

Eskom Holding SOC (state owned company) Ltd (hereafter to be referred to as Eskom) is proposing to establish a **photovoltaic (PV)** solar energy facility of up to 75 MW and associated infrastructure on a site within the Lethabo Coal Fired Power station boundary, approximately 25 km north-east of Sasolburg in the Free State Province (Refer to Figure 1.1). This project is to be known as the Lethabo PV Solar Energy Facility. Based on a pre-feasibility analysis and site identification process undertaken by Eskom a favourable area has been identified for consideration and evaluation through an Environmental Impact Assessment (EIA) process.

The EMPr has been developed on the basis of the findings of the EIA, and must be implemented to protect sensitive on-site and off-site features through controlling construction, operation and decommissioning activities that could have a detrimental effect on the environment, and through avoiding or minimising potential impacts. This EMPr is applicable to all Eskom Holding SOC Ltd employees and contractors working on the pre-construction, construction, and operation and maintenance phases of the Lethabo PV Solar Energy Facility. The document must be adhered to, updated as relevant throughout the project life cycle.

PROJECT DETAILS

CHAPTER 2

The Lethabo PV Solar Energy Facility will have a net generating capacity of up to 75 MW which will accommodate several arrays of PV panels and associated infrastructure. The project will comprise of the following typical infrastructure:

- » Solar panels (fixed/tracking technology).
- » Mounting structures for the solar panels to be rammed steel piles or piles with pre-manufactured concrete footings, or ground screws to support the PV panels.
- » Central inverter/transformer stations to collect all energy generated from the PV panels. The role of the inverter is to convert direct current (DC) electricity to alternating current (AC) electricity at grid frequency.
- » An on-site substation or switching station.
- » A power line to facilitate the connection of the solar energy facility from the on-site substation to Lethabo power station or nearest grid access point.
- » Internal access roads.
- » Associated buildings including a workshop area for maintenance, storage, and control facility with basic services such as water and electricity.

2.1. Findings of the Environmental Impact Assessment

The area infrastructure will be entirely contained within this identified site and will have a developmental footprint of approximately ~162 ha. In terms of the findings of the EIA Report, various planning, construction, and operation-related environmental impacts were identified, including:

- » Disturbance of the ecological environment (i.e. flora and fauna)
- » Impacts on water resources (i.e. wetlands in the study area)
- » Impacts on the visual aesthetics and sensitive receptors
- » Impacts on the underlying geology (i.e. in terms soil disturbance and erosion)
- » Impacts on soils and agricultural potential
- » Impacts on heritage resources
- » Social impacts

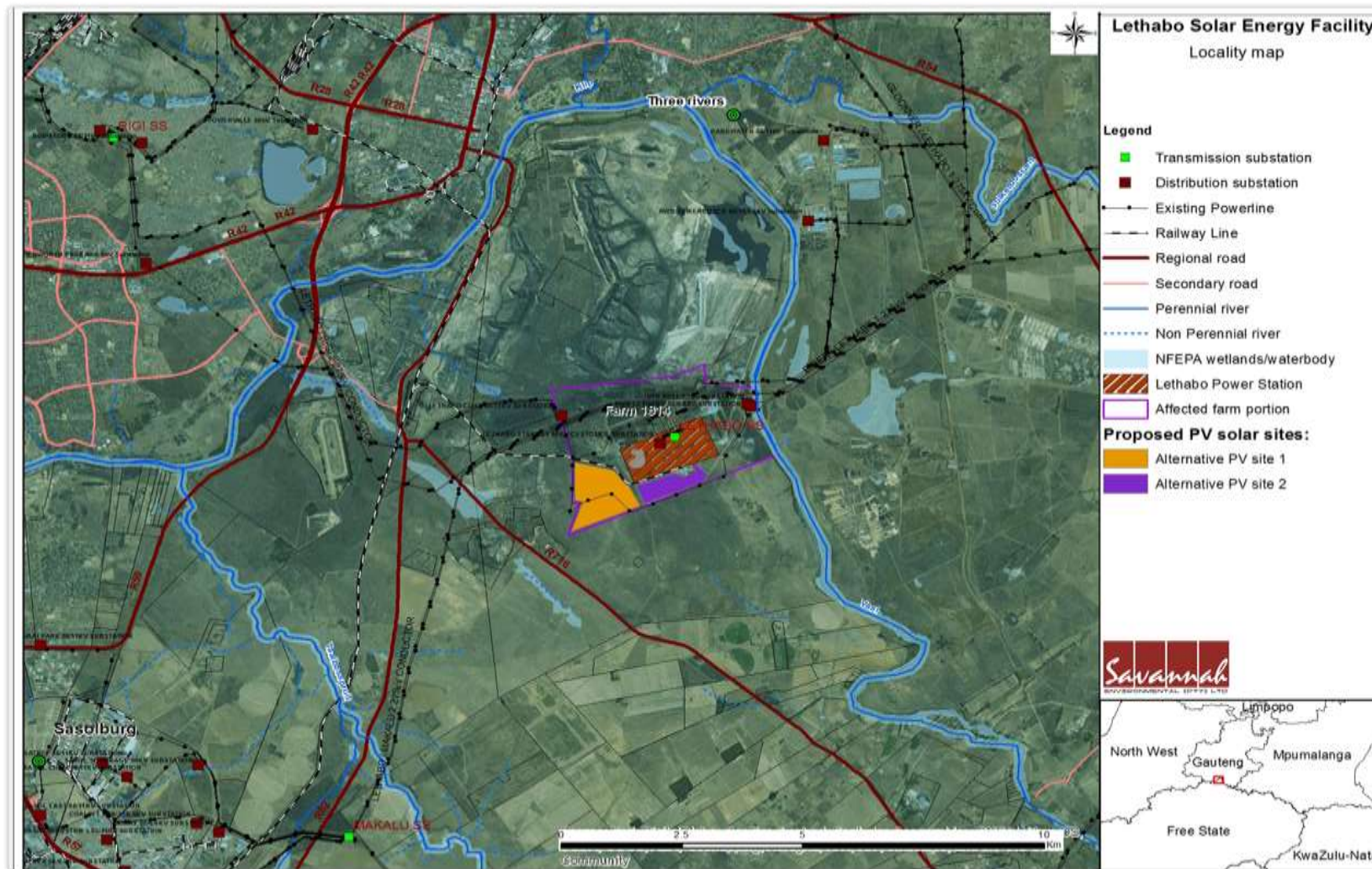


Figure 2.1: Locality map showing the location of Farm 1814 for the proposed Lethabo PV Solar Facility

In summary, the most significant environmental impacts associated with the proposed project, as identified through the EIA, can be summarised as follows (Refer to Figure 2.2):

Impacts on wetlands

The earth works, construction and operation of the facility will change habitats and the ecological environment, infiltration rates, amount of runoff and runoff intensity of storm-water, and therefore the hydrological regime of the site. Potential impacts to be taken into account include:

- » Loss and disturbance of wetland habitat and fringe vegetation.
- » Introduction and spread of alien invasive vegetation.
- » Changes in the amount of sediment entering the system.
- » Changes in water quality due to toxic contaminants and increased nutrient levels entering the system.
- » Changes in water flow regime due to the alteration of surface characteristics.

Two **wetlands**, both hillside seeps, were recorded in the study area. The wetlands had been exposed to varying degrees of impact. The northern wetland on site alternative 1 is largely in a natural state while the eastern wetland, on site alternative 2 has been highly modified by drains, roads, and infrastructure and alien plants. The wetlands were found to have a **moderate** importance and sensitivity to changes in flow regime and lacked sensitive biota. It is recommended that these development in these areas is avoided and that a 30m buffer is set to protect wetland functionality.

Impacts on ecology occurring on the site

The selected property falls within the Central Free State Grassland (GH 6) as defined by Mucina and Rutherford (2006). A total of 1432 plant species have been recorded in the Sasolburg/Vereeniging area according to the SANBI database. This high number is largely attributable to the many diverse habitats within the grid, but will not all be found within any one habitat type. Three vegetation associations could be identified within the proposed development areas namely:

- » Association 1: *Digitaria eriantha* (Transformed Grassland), this vegetation consists of a relatively dense herbaceous layer, and covers most of site alternative 2. Past rehabilitation efforts have included overseeding by *Digitaria eriantha* and *Eragrostis curvula*. A large presence of alien invasives, most notably *Tagetes minuta* (Khaki Weed), is indicative of the disturbed nature of this vegetation. This grassland has a low sensitivity rating.
- » Association 2: *Paspalum urvillei* – *Verbena bonariensis* (Grassland), a small central section of site alternative 2 has moist soil conditions, which has led to

the establishment of some facultative wetland species. The dense grass layer is heavily invaded by the Category 1b alien invasive *Verbena bonariensis*, which has the capacity to gradually displace more of the natural vegetation. This grassland has a low sensitivity rating.

- » Association 3: *Cynodon dactylon* - *Conyza podocephala* Grassland covers site alternative 1 and beyond. The area was largely transformed by past mining activities, and then rehabilitated. The resultant grassland has subsequently been subjected to uncontrolled grazing. Diversity of the grassland is relatively high but the dominance of *Cynodon dactylon* and abundance of ruderal forbs shows that the vegetation community is still developing and not yet in a stable climax state. Nevertheless, the presence of several geophytes, including the slow-growing *Boophane disticha*, show a positive trajectory of change of these grasslands. This grassland has a medium sensitivity rating.

Only 115 indigenous plant species could be verified on site, with an additional 22 alien invasive species (excluding planted exotic trees). As mentioned above, *Boophane disticha* plants were encountered on the study site and are protected by the Nature Conservation Ordinance 8 of 1969 Schedule 6: Protected Species (Refer to Appendix F of this EMPr).

It is not expected that the development will compromise the survival of or significantly impact any flora or terrestrial vertebrate species on the study area or beyond. The most significant impacts are expected to be on ecosystem health and functionality, which should remain relatively intact if all mitigation recommendations are implemented; and the associated integrity of surrounding wetlands

Other issues identified which could have an impact on the environment include:

- » Impacts on avifauna: The overall impact on Avifauna is likely to be of a medium significance prior to mitigation. This could be reduced to low negative significance following the implementation of mitigation measures, which includes a buffer around the wetlands. Given the presence of existing habitat degradation and disturbance associated with the mining, energy generation and industrial activities that are prevalent in the study area and surrounds, and due to the relatively low importance of the site for many bird species, most impacts are seen as acceptable for avifauna.
- » Impacts on the local soils, land capability and agricultural potential of the site: The overall impact on Soils and Agricultural Potential is likely to be of a medium to low significance prior to mitigation. This could be reduced to low negative significance following the implementation of mitigation measures. Alternative 1 has a distinct difference in soils between the northern and southern halves. The northern half has largely disturbed, poor quality soils

while the southern half has better agriculture potential, especially in the south-west.

- » Visual impacts mainly due to the solar panels and partly due to other associated infrastructure (power line, access road etc.). The overall visual impact is likely to be of a low significance. The proposed development will take place within a landscape that is already heavily impacted by large scale industrial development including mining operations and the Lethabo Power Station. The most sensitive landscape areas include the rural landscape to the east of. The assessment has shown however that the impacts will be largely screened by existing vegetation and are likely to be negligible given the existing industrial context within which the views will be seen. Areas to the east of the arrays could be affected to a small degree by glare during early mornings in February, March, September and October. The area impacted is not highly developed nor does a major route run through it. The impact is also so minor that it is likely to be un-noticeable and is therefore negligible.

- » Impacts on heritage and paleontological resources:
The overall impact on the heritage resources is likely to be of a low significance as very sparse heritage traces (of low heritage value) were found during the field survey. Based on the results of the study there are no significant archaeological risks associated with the proposed solar facility at either site considered. However graves can be expected anywhere on the landscape and the low archaeological visibility during the survey could result in graves not identified in the study area.

- » Social and economic impacts:
The overall social impact is likely to be of a medium significance in terms of positive impacts, and a low medium significance in terms of the negative impacts. The proposed development represents greater positive social potential than negative implications due to the development being located in an industrial area.

The findings of the specialist studies undertaken within this EIA to assess both the benefits and potential negative impacts anticipated as a result of the proposed project conclude that there are identified negative impacts that must be reduced by implementing the mitigation measures recommended. This specifically includes optimising the facility layout to include 30 m buffer zones around the wetland sensitivities identified in order to avoid impacting on these sensitive habitats. The project must adhere to this constraint to meet the requirements of sustainable development.

2.2. Layout

In response to the identified need to adequately manage impacts within sensitive areas identified on the site development footprint, and in order to demonstrate the ability of the project to adhere to recommended mitigation measures, Eskom has developed a best practice mitigation strategy with regards to the facility layout.

The EIA recommendations have been taken into account by Eskom. The PV facility layout has been optimised to avoid the encroachment of wetlands on Site Alternative 1, in order to maintain optimal wetland functionality in the study area. The refinement of the layout results in a decrease in the net generating capacity of the PV facility, from 75 MW to 73 MW. This refined layout will still be able to meet the main objective of supplementing Eskom's self consumption at the Lethabo Power station. The required mitigation measures are illustrated in Figure 2.3 and represent a positive outcome in terms of impact reduction and mitigation and the optimal layout for the facility. This layout indicates the following:

- » Position of solar facilities and its associated infrastructure;
- » Internal roads indicating width;
- » Connection routes;
- » All existing infrastructure on site;
- » Permanent development footprint;
- » Construction lay down area;
- » Main access road;
- » Substation (indicating entire footprint);
- » Power line connection route; and
- » Buildings and
- » Implementation of the wetland buffers

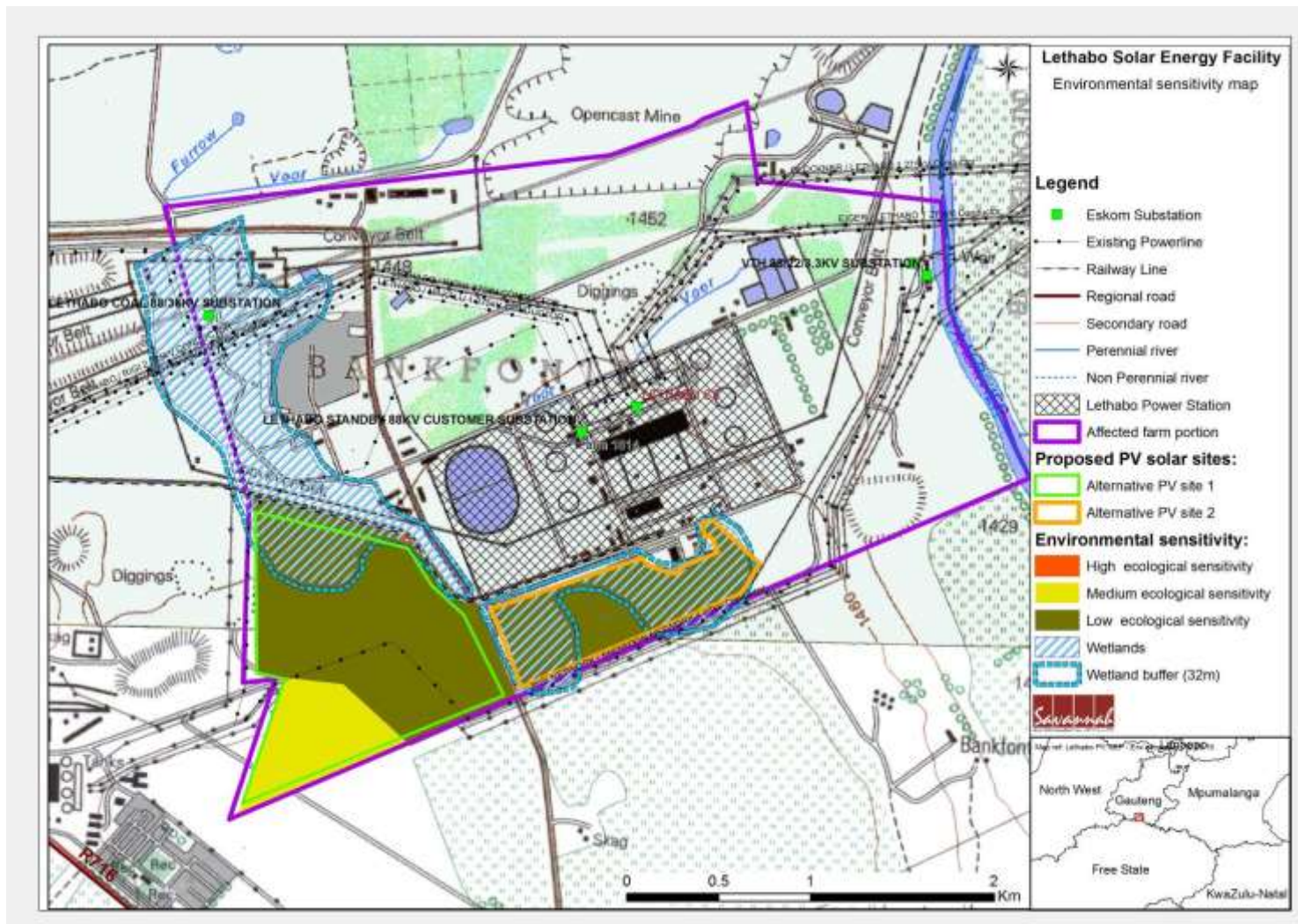


Figure 2.2: Environmental Sensitivity Map for the proposed Lethabo PV Solar

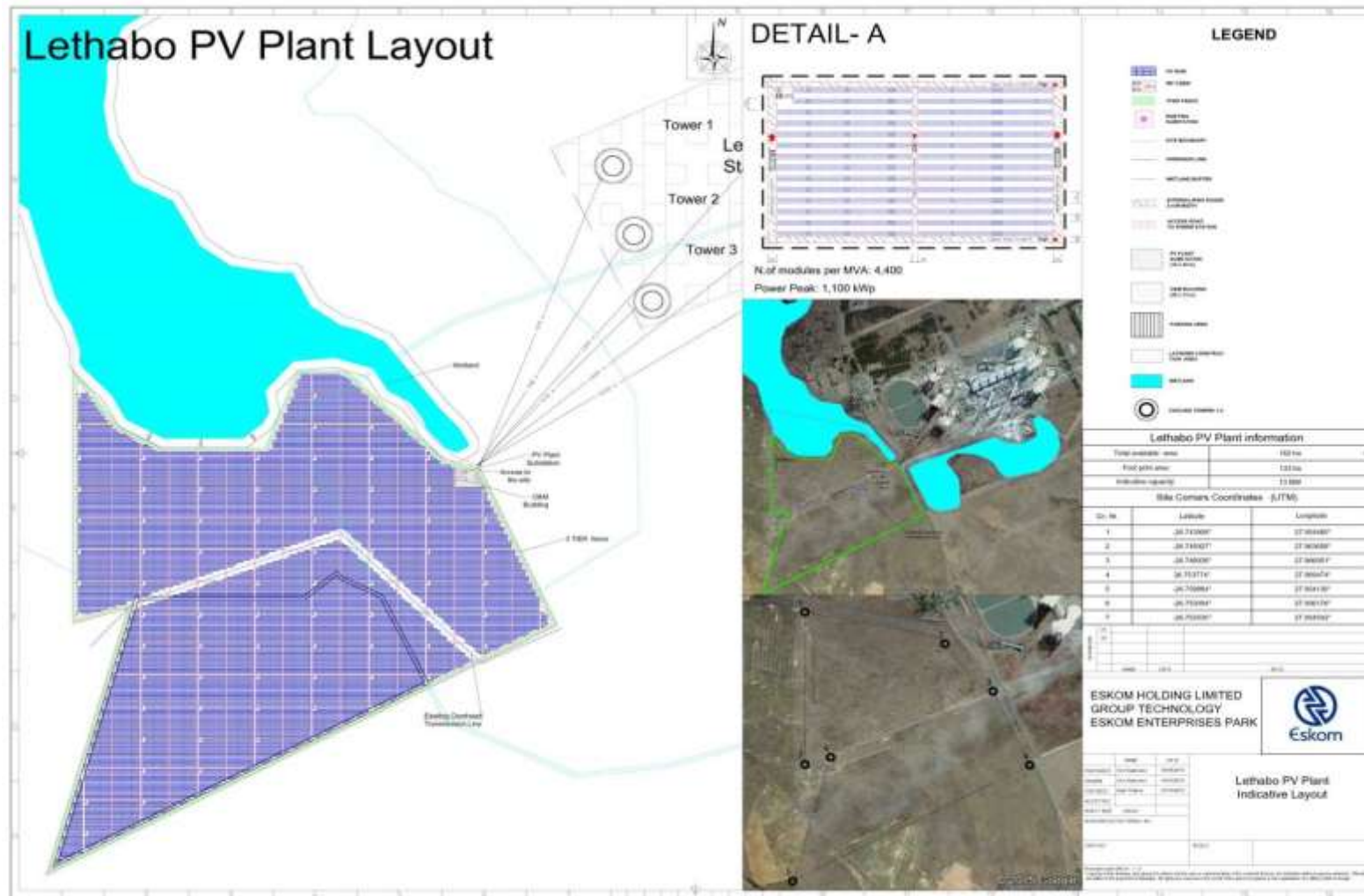


Figure 2.3: Optimised Layout map, including buffers, showing Lethabo PV Solar Energy Facility as well as all associated infrastructure on a site to be located within Farm 1814 Energy Facility

2.3 Activities and Components associated with the Solar Energy Facility

The main activities/components associated with the proposed facility are detailed in the tables which follow.

Construction Phase:

The construction of the proposed project is expected to extend over a period of approximately 15-18 months and create at least ~250-300 employment opportunities at peak. However this number is likely to vary depending on the final designs of the proposed project. In terms of skills requirements, it is common that approximately 45% of the opportunities will be available to low-skilled workers (construction labourers, security staff etc.), 22% will be available to semi-skilled workers (drivers, equipment operators etc.), and 33% will be available to skilled personnel (engineers, land surveyors, project managers etc.). The work associated with the construction phase will be undertaken by contractors and will include the establishment of the Lethabo PV Solar Energy Facility and the associated components, including, access roads, the on-site substation and power line.

The majority of low-skilled employment opportunities associated with the project are likely to benefit members from the local community. In this regard the majority of the beneficiaries are likely to be historically disadvantaged (HD) members of the community. The majority of the skilled and semi-skilled opportunities are likely to be associated with the contractors appointed to construct the proposed solar energy facility and the associated infrastructure.

Typically the construction will operate as a 'follow the leader' where the ground-works will be prepared followed by the erection of mounting structures and then followed by the attachment of the solar panels and the integration of the electrical equipment. The following construction activities are expected to form part of the project's scope of work (refer to **Table 2.1**).

Table 2.1: Activities associated with the construction of a PV facility

Activity	Description
Pre-construction surveys	<p>Prior to initiating construction, a number of detailed surveys will be required including, but not limited to:</p> <ul style="list-style-type: none"> » <i>Geotechnical survey</i> – the geology and topography of the study area will be confirmed. The geotechnical study will look at flood potential, foundation conditions, potential for excavations, and the availability of natural construction materials. This study will serve to inform the type of foundations required to be built and the extent of earthworks and compaction required in the establishment of any internal access roads. » <i>Site survey</i> – this will be required to finalise the design layout of the solar field and other associated infrastructure. The finalisation will need to be confirmed in line with the Environmental Authorisation (once issued) for the facility. » <i>Power line servitude survey</i> – once the placement of the power line towers has been finalised, a walk through survey will be undertaken for ecological sensitivities which may necessitate certain towers to be moved to avoid sensitivities.
Establishment of access roads	<ul style="list-style-type: none"> » Access to the site is provided directly from the R716 that runs parallel to the western boundary of the proposed site. As material and components would need to be transported access to the site will use existing roads where possible and where there are no existing roads, new roads will be constructed. However, further roads may need to be established for construction and maintenance purposes. The extent of earthworks and compaction required in the establishment of the access roads will be established through the detailed geotechnical study which will be undertaken as part of the design phase of the facility. » Internal roads within the study site may need to be established to provide access during construction and operational phase. These roads will be approximately 6m -8m in width.
Undertake site preparation	<ul style="list-style-type: none"> » Site preparation activities will include clearance of vegetation at the footprint of the area infrastructure (i.e. substation, ancillary buildings) and linear component (i.e. internal access roads). These activities will require the stripping of topsoil which will need to be stockpiled, backfilled and/or spread on site. » Site preparation will also include the fencing of the site.
Transport of components and equipment to site	<ul style="list-style-type: none"> » The components for the proposed facility will be transported to site, in sections, by road. Some of the components for the power generation 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, and compaction equipment etc.) as well as components required for the establishment of the substation and power line. » In some instances, the dimensional requirements of the loads to be transported during the construction phase (e.g.

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

Activity	Description
	<p>the transformer of the substation) may require alterations to the existing road infrastructure (e.g. widening on corners), and protection of road-related structures (i.e. bridges, culverts, etc.) because of abnormal loading.</p>
<p>Establishment of construction camps, workshops, and temporary laydown areas</p>	<ul style="list-style-type: none"> » Once the required construction equipment has been transported to site, dedicated equipment camp(s) and laydown area(s) will be required which will be of a temporary nature and ~2 ha in size. These construction camp(s) will serve to confine activities and storage of equipment to designated area(s) 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. » Fuel required for the on-site construction vehicles and equipment will need to be secured in a temporary bunded facility within the construction camp(s) to prevent leakages and soil contamination.
<p>Establishment of PV panels</p>	<ul style="list-style-type: none"> » The PV panels will be arranged in arrays, the mounting structure will be preferably fixed onto the ground with the use of rammed or screw anchor foundations. » Trenching would occur within each array to accommodate the electrical cables. The trenches would be up to ~ 1.8m in width and 2m deep, for a total combined length of approximately 10 km. Minimal ground disturbance may occur within the trenched corridors to restore them after soil has been replaced in the trenches, so that the corridor can conform to the existing surface contours.
<p>Establishment of substation and power line</p>	<ul style="list-style-type: none"> » Inverters will be installed to facilitate the connection between the solar energy facility and the Eskom electricity grid via a new 11 kV (for connection at station board) or 132 kV (for connection at HV yard) power line. » The position of the inverters within the footprint will be informed by the final positioning of the PV components. » The construction of a substation would require a survey of the site, site clearing and levelling and construction of access road/s (where required), construction of a level terrace and foundations, assembly, erection, installation and connection of equipment, and rehabilitation of any disturbed areas and protection of erosion sensitive areas.
<p>Undertake site rehabilitation</p>	<ul style="list-style-type: none"> » Once construction is completed and all construction equipment is removed, the areas affected by construction activities must be rehabilitated where practical and reasonable. On full commissioning of the facility, any access points to the site that are not required during the operational phase or by the landowner must be closed and prepared for rehabilitation.

Operation and Maintenance Phase:

The operation phase is expected to extend for a period of approximately 20 – 25 years with plant maintenance. It is anticipated that during this time 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 (typically using water) and the maintenance of the solar facility components and associated infrastructure (such as access roads). 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.

Table 2.2: Activities associated with the operation of a PV facility

Activity	Description
Operation of the PV panels and the associated electrical infrastructure	<ul style="list-style-type: none"> » The PV panels will convert the light energy from the incoming radiation into electrical energy (i.e. as direct current). » The inverters will change the power from direct to alternating current. Thereafter the electricity will be conveyed to the substation via the new 11 kV (for connection at station board) or 132 kV (for connection at HV yard) power line. » Occasional cleaning of the panels will be required throughout the life cycle of the facility when necessary.
Site operation and maintenance	<ul style="list-style-type: none"> » Full-time security, maintenance, and control room staff will be required on site. » Each component within the solar energy facility will be operational except under circumstances of mechanical breakdown, unfavourable weather conditions, or routine maintenance activities. » The access to the site and the internal access roads will be maintained during the operational phase. » Vegetation Maintenance and Weed Control measures will be undertaken as required.

Decommissioning Phase

The PV panels and associated infrastructure would only be decommissioned once they have reached the end of their economic life. It is most likely that decommissioning activities would comprise the disassembly and replacement of the individual components with more appropriate technology/infrastructure available at that time. The following decommissioning activities will form part of the project scope.

Table 2.3.: Activities associated with the decommissioning of a PV facility

Activity	Description
Site preparation	Site preparation activities will include confirming the integrity of the access to the site to accommodate the required equipment (e.g. lay down areas and decommissioning camp) and the mobilisation of decommissioning equipment.
Disassemble existing components	The components would be disassembled, and reused and recycled (where possible), or disposed of in accordance with regulatory requirements.

2.4. Benefits of the Proposed Project

Internationally there is an increase in the deployment of renewable energy technologies for the generation of electricity due to concerns such as climate change and exploitation of non-renewable resources. Through the Integrated Resource Plan (IRP), the South African Government has set a target for renewable energy of 17 GWh renewable energy contributions to final energy consumption by 2030, to be produced mainly from biomass, wind, solar and small-scale hydro. Eskom has already successfully installed PV systems at offices and parking lots within Eskom-owned property to promote renewable energy awareness and to diversify their own energy mix. Furthermore, Eskom is looking at further reducing its self-consumption at its sites by introducing the PV Programme which aims to install up to 150 MWp at its various power stations, which includes the proposed Lethabo PV Solar Energy Facility. The solar PV facility will promote the reduction of Eskom's carbon footprint and support the demand side management energy efficiency programme.

Through pre-feasibility assessments and research, the technical viability of establishing a 75 MW solar energy facility within the Lethabo Coal Fired Power Station in the Sasolburg area of the Free State Province has been established by Eskom. The positive implications of establishing a solar energy facility on the demarcated site include:

- » The solar PV facility will promote the reduction of Eskom's carbon footprint and support the demand side management energy efficiency programme;
- » The potential to harness and utilise solar energy resources within the Free State Province;
- » The project would assist the South African government in reaching their set targets for renewable energy;
- » The project would assist the South African government in the implementation of its green growth strategy and job creation targets;
- » The project would assist the district and local municipalities in reducing levels of unemployment through the creation of jobs and supporting local business;
- » Promotion of clean, renewable energy in South Africa;
- » Creation of local employment, business opportunities and skills development for the area.

Given South Africa's reliance on Eskom as a power utility, and Eskom's reliance on non-renewable energy sources, the benefits associated with Eskom also producing renewable energy is regarded as an important contribution to meeting national renewable energy and climate change targets. It also enables Eskom to support the demand side management energy efficiency programme as the proposed development represents an investment in clean, renewable energy infrastructure, which represents a positive social benefit for society as a whole.

PURPOSE AND OBJECTIVES OF THE EMPr

CHAPTER 3

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”. 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 Construction and Operational Environmental Management Programme (CEMPr and OEMPr) has been compiled for the proposed Lethabo PV 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 of June 2010 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).

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.

Eskom 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 the proposed Lethabo Solar PV Energy Facility, it is important that this document be read in conjunction with the final Scoping and EIA Report 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 must be adhered to, updated as relevant throughout the project life cycle.

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:

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

These chapters set out the procedures necessary for Eskom as the project owner, to minimise environmental impacts and achieve environmental compliance. For each of the phases of implementation, an over-arching environmental **goal** is stated. In order to meet this goal, a number of **objectives** are listed. The EMPr has been structured in 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:

a). 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, should be modified, etc.

The table below specifies plans required for the proposed project as specified by the DEA in the acceptance of the scoping report.

Table 4.1: Management plans for the proposed project

Plans required	Location in report
Layout and Sensitivity Map	Appendix A
Grievance Mechanism for Public Complaints and Issues	Appendix B
Waste Management Plan	Appendix C
Alien Invasive Species and Open Management Plan	Appendix D
Re-Vegetation and Habitat Rehabilitation Plan	Appendix E
Plant Protection and Rescue Plan	Appendix F
Traffic Management Plan	Appendix G
Storm Water Management Plan	Appendix H
Erosion Management Plan	Appendix I
Lethabo Power Station Emergency Response Plan	Appendix J:

4.1 Project Team

This draft EMPr was compiled by:

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	Robert Taylor	Limosella Consulting

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

KEY LEGISLATION APPLICABLE TO THE DEVELOPMENT CHAPTER 5

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)
- » Metsimaholo Municipality Integrated Development Plan
- » International guidelines – the Equator Principles and the International Finance Corporation and World Bank Guidelines.

International standards - Equator Principles.

Several other Acts, standards, or guidelines have also informed the project process and the scope of issues addressed and assessed in the EIA Report. A review of legislative requirements applicable to the proposed project is provided in **Table 5.1**.

Table 5.1: Relevant legislative and permitting requirements applicable to the establishment of the proposed Lethabo Solar PV 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 December 2010, a Scoping and EIA Process is required to be undertaken for the proposed project.</p>	<p>National Department of Environmental Affairs – lead authority.</p> <p>Provincial Free State – Department of Economic Development, Tourism and Environmental Affairs (DETEA)</p>	The final EIA report is to be submitted to the DEA and Provincial Environmental Departments in support of the application for authorisation.
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 (as regulator of NEMA).	While no permitting or licensing requirements arise directly by virtue of the proposed project, this section will find application during the EIA phase and will continue to apply throughout the life cycle of the project.
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 likely to

Legislation	Applicable Requirements	Relevant Authority	Compliance requirements
		Free State – Department of Economic Development, Tourism and Environmental Affairs (DETEA) Local Authorities	present a significant intrusion to the local community. There is no requirement for a noise permit in terms of the legislation.
National Water Act (Act No 36 of 1998)	<p>Water uses under Section 21 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; and altering of bed, banks or characteristics of a watercourse - Section 21i.</p>	Department of Water Affairs & Sanitation (DWS)	<p>A water use license (WUL) is required to be obtained if water resources (such as wetlands or drainage lines) are impacted on, or if infrastructure lies within 500m of wetland features or the regulated area of a watercourse (being the riparian zone or the 1:100yr floodline whichever is greatest).</p> <p>Should water be extracted from groundwater/ 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>
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>	Department of Mineral Resources	As no borrow pits are expected to be required for the construction of the facility, no mining permit or right is required to be obtained.

Legislation	Applicable Requirements	Relevant Authority	Compliance requirements
	<p>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>		
<p>National Environmental Management: Air Quality Act (Act No 39 of 2004)</p>	<p>Sections 18, 19 and 20 of the Act allow certain areas to be declared and managed as “priority areas” in terms of air quality.</p> <p>Declaration of controlled emitters (Part 3 of Act) and controlled fuels (Part 4 of Act) with relevant emission standards.</p> <p>Section 32 makes provision for measures in respect of dust control.</p> <p>Section 34 makes provision for:</p> <p>(1) the Minister to prescribe essential national noise standards -</p> <p>(a) for the control of noise, either in general or by specified machinery or activities or in specified places or areas; or</p> <p>(b) for determining -</p> <p>(i) a definition of noise</p> <p>(ii) the maximum levels of noise</p> <p>(2) When controlling noise the provincial and local</p>	<p>National Department of Environmental Affairs – air quality</p> <p>Local Municipality - Noise</p>	<p>No permitting or licensing requirements applicable for air quality aspects.</p> <p>The section of the Act regarding noise control is in force, but no standards have yet been promulgated. Draft regulations have however, been promulgated for adoption by Local Authorities.</p> <p>An atmospheric emission licence issued in terms of Section 22 may contain conditions in respect of noise. This will however, not be relevant to the facility, as no atmospheric emissions will take place.</p> <p>The Act provides that an air quality officer may require any person to submit an atmospheric impact report if there is reasonable suspicion that the</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance requirements
	<p>spheres of government are bound by any prescribed national standards.</p>		<p>person has failed to comply with the Act.</p>
<p>National Heritage Resources Act (Act No 25 of 1999)</p>	<p>Section 38 states that Heritage Impact Assessments (HIAs) are required for certain kinds of development including</p> <ul style="list-style-type: none"> » the construction of a road, power line, pipeline, canal or other similar linear development or barrier exceeding 300 m in length; » any development or other activity which will change the character of a site exceeding 5 000 m² in extent. <p>The relevant Heritage Resources Authority must be notified of developments such as linear developments (such as roads and power lines), bridges exceeding 50m, or any development or other activity which will change the character of a site exceeding 5 000 m²; or the re-zoning of a site exceeding 10 000 m² in extent. This notification must be provided in the early stages of initiating that development, and details regarding the location, nature and extent of the proposed development must be provided.</p> <p>Standalone HIAs are not required where an EIA is carried out as long as the EIA contains an adequate HIA component that fulfils the provisions of Section 38. In such cases only those components not addressed by the EIA should be covered by the heritage component.</p>	<ul style="list-style-type: none"> » National Department of Environmental Affairs where heritage assessment is a component of the EIA » South African Heritage Resources Agency (SAHRA) – National heritage sites (grade 1 sites) as well as all historic graves and human remains. » Free State Heritage Resources Authority - Issue of permits for removal or destruction of heritage resources in the Free State Province 	<p>A permit may be required should cultural/heritage chance finds are discovered during construction.</p>
<p>National Environmental</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 	<p>National Department of Environmental Affairs</p>	<p>A specialist flora and fauna assessment has been undertaken for the proposed</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance requirements
Management: Biodiversity Act (Act No 10 of 2004)	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). » The Department of Environmental Affairs (DEA) published Regulations on Alien and Invasive Species (AIS) in terms of the National Environmental Management: Biodiversity Act, on Friday 1st August 2014. A total of 559 alien species are now listed as invasive, in four different	Free State – Department of Economic Development, Tourism and Environmental Affairs (DETEA)	project. A permit may be required should any listed plant species (such as <i>Boophane disticha</i>) are disturbed or destroyed as a result of the proposed development. NB: All list of protected vertebrate species (reptiles, birds, and mammals) that could occur in the study area according to the ADU and SANBI databases, as well as Apps (2000) is presented in Appendix C of the ecology report.

Legislation	Applicable Requirements	Relevant Authority	Compliance requirements
	<p>categories. A further 560 species are listed as prohibited, and may not be introduced into the country</p>		
<p>Conservation of Agricultural Resources Act (Act No 43 of 1983)</p>	<ul style="list-style-type: none"> » Regulation 15 of GNR1048 provides for the declaration of weeds and invader plants, and these are set out in Table 3 of GNR1048. Declared Weeds and Invaders in South Africa are categorised according to one of the following categories: » Category 1 plants: are prohibited and must be controlled. » Category 2 plants: (commercially used plants) may be grown in demarcated areas providing that there is a permit and that steps are taken to prevent their spread. » Category 3 plants: (ornamentally used plants) may no longer be planted; existing plants may remain, as long as all reasonable steps are taken to prevent the spreading thereof, except within the floodline of watercourses and wetlands. » These regulations provide that Category 1, 2 and 3 plants must not occur on land and that such plants must be controlled by the methods set out in Regulation 15E. 	<p>Department of Agriculture</p>	<ul style="list-style-type: none"> » While no permitting or licensing requirements arise from this legislation, this Act will find application during the EIA phase and will continue to apply throughout the life cycle of the project. In this regard, soil erosion prevention and soil conservation strategies must be developed and implemented. In addition, a weed control and management plan must be implemented. » The permission of agricultural authorities will be required if the Project requires the draining of vleis, marshes or water sponges on land outside urban areas. However, none of these activities are expected to be undertaken on site.
<p>National Forests Act (Act No. 84 of 1998)</p>	<ul style="list-style-type: none"> » Protected trees: 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 	<p>Department of Environmental Affairs</p>	<p>A permit or license is required for the destruction of protected tree species and/or indigenous tree species within a natural forest.</p> <p>No protected tree species were observed within or near the study area</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance requirements
	<p>protected tree, except under a licence granted by the Minister’.</p> <p>» Forests: Prohibits the destruction of indigenous trees in any natural forest without a licence.</p>		<p>and it is highly unlikely that any protected tree species would be impacted by the development.</p>
<p>National Veld and Forest Fire Act (Act 101 of 1998)</p>	<p>In terms of S12 the landowner must ensure that the firebreak is wide and long enough to have a reasonable chance of preventing the fire from spreading, not causing erosion, and is reasonably free of inflammable material.</p> <p>In terms of S17, the landowner must have such equipment, protective clothing, and trained personnel for extinguishing fires.</p>	<p>Department of Water Affairs</p>	<p>While no permitting or licensing requirements arise from this legislation, this act will find application during the operational phase of the project. Due to the fire prone nature of the area, it must be ensured that the landowner and developer proactively manage risks associated with veld fires and provide cooperation to the local Fire Protection Agency.</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 by reason of 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</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>

Legislation	Applicable Requirements	Relevant Authority	Compliance requirements
	<p>means, cause extreme risk of injury etc., can be declared to be Group I or Group II hazardous substance;</p> <ul style="list-style-type: none"> » Group IV: any electronic product; » 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>National Environmental Management: Waste Amendment Act, 2014 (Act No. 26 of 2014)</p>	<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 intact and not corroded or in any other way 	<p>Hazardous Waste – National DEA General Waste –FS DETEA</p>	<p>As no waste disposal facility is proposed, no waste license is required to be obtained. Should waste be stored on site, this will be required to be in terms of the Norms and Standards for Waste Storage (GN 926 of November 2013).</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance requirements
	<p>rendered unlit for the safe storage of waste.</p> <ul style="list-style-type: none"> » Adequate measures are taken to prevent accidental spillage or leaking. » The waste cannot be blown away. » Nuisances such as odour, visual impacts and breeding of vectors do not arise; and » Pollution of the environment and harm to health are prevented. 		
<p>National Road Traffic Act (Act No 93 of 1996)</p>	<ul style="list-style-type: none"> » The technical recommendations for highways (TRH 11): "Draft Guidelines for Granting of Exemption Permits for the Conveyance of Abnormal Loads and for other Events on Public Roads" outline the rules and conditions which apply to the transport of abnormal 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 road pavements, bridges, and culverts. » The general conditions, limitations, and escort requirements for abnormally dimensioned loads and vehicles are also discussed and reference is made to speed restrictions, power/mass ratio, mass distribution, and general operating conditions for abnormal loads and vehicles. Provision is also made for the granting of permits for all other exemptions from the requirements of the National Road Traffic Act and the relevant Regulations. 	<p>Provincial Department of Transport (provincial roads)</p>	<p>An abnormal load/vehicle permit may be required to transport the various components to site for construction. These include:</p> <ul style="list-style-type: none"> » 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 loaded, some of the power station components may not meet specified dimensional limitations (height and width).

Legislation	Applicable Requirements	Relevant Authority	Compliance requirements
Provincial			
The Nature Conservation Ordinance (NCO) 8 of 1969 and subsequent amendments	The Act provides for the conservation of fauna and flora and the hunting of animals causing damage and for matters incidental thereto	Free State Department of Economic Development, Tourism and Environmental Affairs (DETEA)	A permit may be required for flora and fauna removal, therefore this provincial legislation has been incorporated in this report and will remain applicable through the life cycle of the proposed project.

Table 5.2: Standards applicable to the Lethabo PV Solar Energy Facility project

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	National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) – National norms and standard for the storage of waste. » 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

Theme	Standard	Summary
	South African Water Quality Guidelines	Provides water quality guidelines

MANAGEMENT PROGRAMME: PLANNING AND DESIGN CHAPTER 6

Overall Goal: undertake the pre-construction (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

a) OBJECTIVE 1: Ensure the facility design responds to identified environmental constraints and opportunities

The most sensitive landscape features for planning purposes in the study area will be the presence of the followings features on site:

- » **Impacts on Ecology:** The study area falls within the original extent of the Central Free State Grassland (Unit Gh 6) as defined by Mucina and Rutherford (2006). The Central Free State Grassland (Unit Gh 6) is a relatively short grassland on undulating plains. This vegetation type is not officially listed as a threatened ecosystem, but it is regarded as vulnerable (Mucina and Rutherford 2006) due to large portions of it being transformed either for cultivation or by dams, with only small portions that are protected such as in the Rustfontein Dam Nature Reserve. Red data species, *Boophane disticha*, were encountered on the study site and are protected by the Nature Conservation Ordinance 8 of 1969 Schedule 6: Protected Species.
- » **Impacts on Water Surface Water Resources:** Two wetlands, both hillside seeps, were found on the site. The wetlands have been exposed to varying

degrees of impact. The northern wetland on Site Alternative 1 was largely natural while the eastern wetland, on Site Alternative 2 was highly modified by drains, roads, and infrastructure and alien plants. The wetlands were found to have a moderate importance and sensitivity to changes in flow regime and lacked sensitive biota. It is recommended that development in these areas is avoided and that a 30m buffer is set to protect wetland functionality.

Opportunities to mitigate the negative impacts of large-scale PV developments largely arise during the planning and design stages. The correct choice of footprint location and layout is paramount, thus ecosystem components such as biodiversity and ecosystem function should be given full consideration during the design phase, as determined by the Environmental Impact Assessment.

The exact design of PV arrays (panel size, height, spacing, and nature of panels – tracking or fixed) can be equally important. The timing of pre-commencement, construction, maintenance and decommissioning activities also provides opportunities to reduce negative impacts on biodiversity.

Project Component/s	<ul style="list-style-type: none"> » PV Array » Grid connection and associated servitude » Access roads » Workshop, guardhouses, substation and other related infrastructure » Temporary construction camps » Protective fencing around development » Potential topsoil stockpiles
Potential Impact	<ul style="list-style-type: none"> » Placement of infrastructure that damages and degrades the environment unnecessarily, particularly with respect to habitat and wetland destruction, loss of indigenous flora, establishment, and persistence of alien invasive plants, and erosion.
Activities/Risk Sources	<ul style="list-style-type: none"> » Positioning of solar facility components and internal access routes » Positioning of workshop, guardhouses, substation and other related infrastructure » Alignment of power line servitude » Alignment of access roads to development » Positioning of temporary sites
Mitigation: Target/Objective	<ul style="list-style-type: none"> » To ensure selection of best environmental option for positioning alignment of proposed infrastructure » Environmental sensitivities are taken into consideration and avoided as far as possible, thereby mitigating potential impacts

Mitigation: Action/Control	Responsibility	Timeframe
Plan and conduct pre-construction activities in an environmentally acceptable manner.	Eskom EPC Contractor	Pre-construction
Avoid placement of infrastructure within functional wetland areas.	Eskom EPC Contractor	Pre-construction
Avoid placement of infrastructure within riparian vegetation around wetlands.	Eskom EPC Contractor	Pre-construction
Ensure that a 30 m buffer or more is maintained around the wetlands and their riparian vegetation to maintain the species diversity and buffering capacity of these wetlands surrounding riparian vegetation.	Eskom EPC Contractor	Pre-construction
<p>Undertake pre-construction walk-through footprint investigations for protected flora and burrowing terrestrial vertebrates:</p> <p>The final footprint investigation (walkthrough) is aimed to fully inform the developer, responsible conservation authority (that will issue the relevant permits and authorisations), contractors, EO and ECO about:</p> <ul style="list-style-type: none"> » Protected species that will be affected by the development » Location of protected plant species within the footprint area – approximate mapping of areas of occurrence (alternatively, for linear structures, between which structures or other markers) » Identification of the affected species by providing a representative photo record that enables the ECO and contractors to identify such plants » How many specimens per species will be affected – relatively accurate estimate to the nearest 50, more accurate if less than 50 » Which species can be successfully relocated, which and how many will have to be destroyed » Location and nature of any nesting sites or active burrows of vertebrate species (birds, amphibians, reptiles and mammals), mapped by GPS, that will have to be inspected and cleared/relocated prior to construction by the contractor or duly appointed person(s) » Nature of alien invasive species that will have to be cleared by the contractor » Location and nature of any other significant environmental concerns, e.g. extreme gully erosion, that will need to be addressed by the contractor to prevent any unnecessary (further) degradation of 	Eskom	Pre-construction

Mitigation: Action/Control	Responsibility	Timeframe
the development footprint		
The site-specific EMPr to be updated after the walk-through of the final footprint.	Eskom/Specialist	Pre-construction
The above pre-construction footprint investigations must be used together with results from the ecological specialist report to draft a comprehensive alien invasive species eradication and management plan (Basic requirements of these are listed under the Construction and Operation Phase EMPr)	Eskom/Specialist	Pre-construction
Obtain permits for protected plant removal and relocation from Free State Department of Economic Development, Tourism and Environmental Affairs and DAFF prior to commencement of any activity related to this development.	Eskom /Contractor	Pre-construction
<p>Use design-level mitigation measures recommended in respect of habitat and ecosystem intactness and prevention of species loss as detailed within the EIA Report</p> <ul style="list-style-type: none"> » This includes positioning components of the development as close as possible together and in close proximity to other existing or planned developments in the area » Strictly adhere to existing tracks/roads where ever possible to gain access to the site » Sites for storing, mixing, and handling topsoil stockpiles (if necessary) or any introduced materials, including all machinery or processing implements, must be placed in an ecologically least sensitive area and at least 500 m from any type of wetland. Such sites must be clearly indicated in site plans and the drafting of relevant detailed method statements and/or management plans requested from the relevant contractor or environmental firm. 	Eskom EPC Contractor	Pre-construction
Access roads and machinery turning points must be planned to minimise the impacted area, avoid the initiation of accelerated soil erosion and prevent unnecessary compaction and disturbance of top soils, prevent obstruction or alteration of natural water flow	Eskom EPC Contractor	Design Phase
Compile a comprehensive storm water management and erosion control plan for the footprint area as part of the final design of the project. Basic requirements of these are listed under the Construction and Operation Phase EMPr (refer to Appendix H)	Eskom EPC Contractor	Pre-Construction

Mitigation: Action/Control	Responsibility	Timeframe
Develop a comprehensive erosion control plan for the footprint area as part of the final design of the project (refer to Appendix I).	Eskom EPC Contractor	Design phase
Permissible biodiversity: » Depending on the final PV array and mechanism developed and taking all potential impacts, fire risks and maintenance requirements into consideration, it has to be decided upon and made clear: * Permissible vegetation: maximum height, desirable density and composition within the development area * Maintenance of this vegetation – mowing, small livestock grazing, etc. Note: due to the hydrogeology to the area, there may be no application of herbicides	Eskom /Specialist	Design phase
After the permissible biodiversity has been determined, compile a comprehensive vegetation rehabilitation management plan (refer to Appendix E).	Eskom /Specialist	Preconstruction
Set realistic local recruitment targets for the construction phase (preference to Ward 19, then the Metsimaholo Local Municipality area)	Eskom EPC Contractor	Preconstruction/ construction
Submit a revised layout plan for the entire PV Solar Energy Facility for approval to the department prior to commencement of construction. This submission must be accompanied by confirmation from an environmental specialist that the sensitive areas identified within the EIA process have been avoided.	Eskom	Pre-construction
Fourteen (14) days written notice must be given to the Department that the activity will commence. The notification must include a date on which the activity will commence as well as the reference number.	Eskom	Pre-construction
An independent ECO must be appointed prior to the commencement of any authorised activities. Once appointed the name and contact details of the ECO must be submitted to the Director: Compliance Monitoring at the DEA.	Eskom	Pre-construction

Performance Indicator	<ul style="list-style-type: none"> » Final design meets environmental objectives. » Ecosystem fragmentation is kept to a minimum » Ecosystem functionality is retained and any unjustified disturbance and degradation prevented
Monitoring	<ul style="list-style-type: none"> » Ensure that the design implemented meets the objectives and

mitigation measures in the EIA Report through review of the design by the Project Manager, and environmental specialist prior to the commencement of the activity.

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

- » **Access Road** - The site can be accessed from the R716 regional road which lies west of the proposed site connecting Vereeniging to Deneyville. Within the site itself, access is already established and is used for the power station. These existing roads will be utilised for construction purposes (and later limited access for maintenance). Internal access roads between the project components will be required.
- » **Power line** - A new 11 kV (for connection at the station board) or 132 kV (for connection at HV yard) will be installed to facilitate the connection between the solar energy facility and the Eskom electricity grid.

Project Component/s	<ul style="list-style-type: none"> » Power line. » Access roads.
Potential Impact	<ul style="list-style-type: none"> » Route that degrades the environment unnecessarily, particularly with respect to visual aesthetics, loss of indigenous flora, and erosion.
Activities/Risk Sources	<ul style="list-style-type: none"> » Alignment of power line. » Alignment of access roads.
Mitigation: Target/Objective	<ul style="list-style-type: none"> » To ensure selection of best environmental option for alignment of linear infrastructure. » Environmental sensitivities are taken into consideration and avoided as far as possible, thereby mitigating potential impacts.

Mitigation: Action/Control	Responsibility	Timeframe
Select a power line alignment within the preferred corridor assessed that curtails environmental impacts and enhances environmental benefits.	Eskom	Design
A designated access to the site must be created and clearly marked to ensure safe entry and exit.	Eskom EPC Contractor	Design
Consider design level mitigation measures recommended by the specialists as detailed within the EIA report and relevant appendices.	Eskom EPC Contractor	Design
Utilise existing roads as far as possible.	EPC Contractor	Design
Compile and implement a traffic management plan	EPC Contractor	Pre-

Mitigation: Action/Control	Responsibility	Timeframe
for the site access roads to ensure that no hazards would result from the increased truck traffic and that traffic flow would not be adversely impacted (refer to Appendix G).		construction
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.	EPC Contractor	Pre-construction
Source general construction material and goods locally where available to limit transportation over long distances.	EPC Contractor	Pre-construction and construction
Appropriate external road management strategies must be implemented on and internal roads with all employees and contractors required to abide by standard road and safety procedures.	EPC Contractor (or appointed transportation contractor)	Pre-construction

Performance Indicator	<ul style="list-style-type: none"> » Power line and road alignments meet environmental objectives. » Selected linear alignments that minimise any negative environmental impacts and maximise any benefits.
Monitoring	<ul style="list-style-type: none"> » Ensure that the design implemented meets the objectives and mitigation measures in the EIA Report through review of the design by the Project Manager, environmental specialist and the ECO prior to the commencement of construction.

c) OBJECTIVE: Minimise storm water runoff and wetland destruction (guideline for stormwater management plan)

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

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

Activities/Risk Sources	» Construction of the facility (i.e. placement of hard engineered surfaces).
Mitigation: Target/Objective	» Appropriate management of storm water to minimise impacts on the environment.

Mitigation: Action/Control	Responsibility	Timeframe
The development footprint should avoid identified wetlands and wetland buffers.	Eskom	Design
A Method Statement for the management of storm water which also considers the recommendations below is to be compiled.	Contractor	Pre-construction
Design infrastructure in order to reduce the potential increase in surface flow velocities and the resultant impact on the localised drainage system through increased sedimentation.	Eskom EPC Contractor	Planning and design
Appropriately plan hard-engineered bank erosion protection structures.	Eskom EPC Contractor	Planning and design
Design an appropriate stormwater management plan to ensure the suitable handling of stormwater within the site (i.e. clean and dirty water streams around the plant and install stilling basins to capture large volumes of run-off, trapping sediments and reduce flow velocities).	Eskom EPC Contractor	Planning, Construction and operation
Design measures for storm water management need to allow for surface and subsurface movement of water along drainage lines so as not to impede natural surface and subsurface flows.	Eskom EPC Contractor	Planning and design

Performance Indicator	» Appropriate storm water management measures included within the facility design.
Monitoring	» Ensure that the design implemented meets the objectives and mitigation measures in the EIA Report through review of the design by the Project Manager, and environmental specialist prior to the commencement of the activity.

d) OBJECTIVE: To ensure effective communication mechanisms

On-going communication with affected and surrounding landowners is important to maintain during the construction and operation 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	<ul style="list-style-type: none"> » Solar energy facility » Associated infrastructure
Potential Impact	<ul style="list-style-type: none"> » 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 B) 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.	Eskom EPC Contractor	Pre-construction (construction procedure) Pre-operation (operation procedure)
Develop and implement a grievance mechanism for the construction, operational and closure phases of the project for all employees, contractors, subcontractors and site personnel. This procedure should be in line with the South African Labour Law.	Eskom EPC Contractor	Pre-construction (construction procedure) Pre-operation (operation procedure)

Performance Indicator	<ul style="list-style-type: none"> » Effective communication procedures in place.
Monitoring	<ul style="list-style-type: none"> » A Public Complaints register must be maintained, by the Contractor and monitored by the ECO, to record all complaints and queries relating to the project and the action taken to resolve the issue. » All correspondence should be in writing

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 remaining indigenous natural vegetation and habitats of ecological value.
- » Minimises impacts on fauna using the site.
- » Minimises the impact on heritage site should they be uncovered.
- » Establishes an environmental baseline during construction activities on the site, where possible.

7.1 Institutional Arrangements: Roles and Responsibilities for the Construction Phase

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

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

Formal responsibilities are necessary to ensure that key procedures are executed. Specific responsibilities of the Project Manager, Site Manager, Safety, Health and Environment Representative, Environmental Control Officer (ECO) and Contractor for the construction phase of this project are as detailed below. Formal responsibilities are necessary to ensure that key procedures are executed. Figure 7.1 provides an organogram indicating the organisational structure for the implementation of the EMPr.

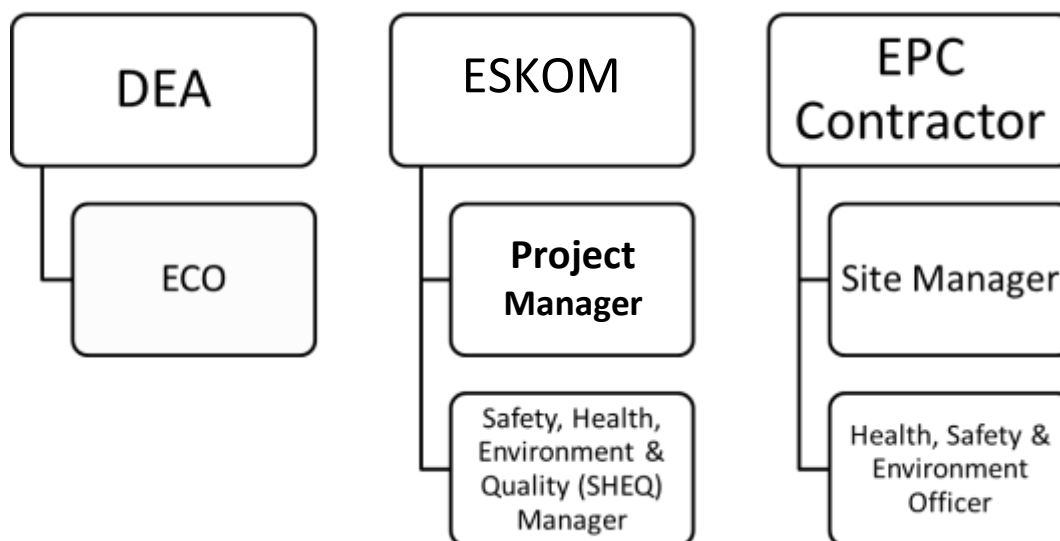


Figure 7.1: Organisational structure for the implementation of the EMPr

Project Manager:

- » 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 Eskom and its Contractor(s) are made aware of all stipulations within the EMPr.
- » Ensure that the EMPr is correctly implemented throughout the project by means of site inspections and meetings. This will be documented as part of the site meeting minutes.
- » Be fully knowledgeable with the EIA for the project, the EMPr, the conditions of the Environmental Authorisation (once issued), and all relevant licences and permits.
- » Be fully knowledgeable with the contents of all relevant licences and permits.

Site Manager (EPC Contractor's on-site Representative) will:

- » Be fully knowledgeable with the contents of the EIA and risk management.
- » Be fully knowledgeable with the contents and conditions of the Environmental Authorisation (once issued).
- » Be fully knowledgeable with the contents of the EMPr.
- » Be fully knowledgeable with the contents of all relevant environmental legislation, and ensure compliance with these.
- » Have overall responsibility of the EMPr and its implementation.
- » Conduct audits to ensure compliance to the EMPr.

- » Ensure there is communication with the Project Manager, the ECO, and relevant discipline engineers on matters concerning the environment.
- » Be fully knowledgeable with the contents of all relevant licences and permits.
- » Ensure that no actions are taken which will harm or may indirectly cause harm to the environment, and take steps to prevent pollution on the site.
- » Confine activities to the demarcated construction site.

An independent **Environmental Control Officer (ECO)** must be appointed by Eskom prior to the commencement of any authorised activities and will be responsible for monitoring, reviewing and verifying compliance by the EPC 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 Environmental Authorisation.
- » Be fully knowledgeable with the contents with the EMPr.
- » Be fully knowledgeable of all the licences and permits issued to the site.
- » 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, EA and the legislation is monitored through regular and comprehensive inspection of the site and surrounding areas.
- » 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.
- » Keep record of all activities on site, problems identified, transgressions noted and a task schedule of tasks undertaken by the ECO.
- » Ensure that the compilation of progress reports for submission to the Technical Director, 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.
- » Submit independent reports to the DEA and other regulating authorities regarding compliance with the requirements of the EMPr, EA and other environmental permits.

As a general mitigation strategy, the Environmental Control Officer (ECO) should be present for the site preparation and initial clearing activities to ensure the correct demarcation of no-go areas, facilitate environmental induction with

construction staff and supervise any flora relocation and faunal rescue activities that may need to take place during the site clearing (i.e. during site establishment, and excavation of foundations). Thereafter weekly site compliance inspections would probably be sufficient. However, in the absence of the ECO there should be a designated owner's environmental officer present to deal with any environmental issues that may arise such as fuel or oil spills. The ECO shall remain employed until all rehabilitation measures, as required for implementation due to construction damage, are completed and the site handed over for operation.

Contractors and Service Providers: It is important that contractors are aware of the responsibilities in terms of the relevant environmental legislation and the contents of this 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 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 Method Statements are submitted to the Site Manager for approval before any work is undertaken.
- » Any lack of adherence to the above will be considered as non-compliance to the specifications of the EMPr.
- » 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).

Contractor’s Safety, Health and Environment Representative: The Contractor’s Safety, Health and Environment (SHE) Representative, employed by the Contractor, is responsible for managing the day-to-day on-site implementation of this EMPr, and for the compilation of regular (usually weekly) Monitoring Reports. In addition, the SHE must act as liaison and advisor on all environmental and related issues and ensure that any complaints received from the public are duly recorded and forwarded to the Site Manager and Contractor.

The Contractor’s Safety, Health and Environment Representative should:

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

7.2 Objectives

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

a) OBJECTIVE: Minimise impacts related to inappropriate 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).
Potential Impact	<ul style="list-style-type: none"> » Hazards to the public. » Damage to wetlands and indigenous natural vegetation. » Loss of threatened plant species
Activities/Risk Sources	<ul style="list-style-type: none"> » Open excavations (foundations and cable trenches). » Movement of construction vehicles in the area and on-site.

Mitigation:	» To secure the site against unauthorised entry.
Target/Objective	» To protect members of the public/landowners/residents.
	» No loss of or damage to wetlands and 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 Site Manager, SHE Representative/EO.	EPC Contractor	Site establishment, and duration of construction
Where necessary control access, fence, and secure area.	EPC Contractor	Site establishment, and duration of construction
Adequate protective measures must be implemented to prevent unauthorised access to the working area and the internal access/haul routes.	EPC Contractor	Site establishment, and duration of construction contract
The Contractor must take all reasonable measures to ensure the safety of the public in the surrounding area. 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 local languages, all to the approval of the Site Manager.	EPC Contractor	Site establishment, and duration of construction contract
Retain vegetation and soil in position for as long as possible, removing it immediately ahead of construction / earthworks in that area.	EPC Contractor	Site establishment
As far as possible, minimise natural and semi-natural vegetation clearing for equipment storage areas. Aim to locate the temporary construction camps on already degraded and/or heavily disturbed areas.	EPC Contractor	Site establishment
Fence and secure contractor's equipment camp.	EPC Contractor	Site establishment
Electric fencing should not have any strands within 30cm of the ground, which should be sufficient to allow smaller mammals, reptiles and tortoises to pass through, but still remain effective as a security barrier.	EPC Contractor	Site establishment
Develop an efficient access control system which allows for the identification of all people on site	EPC Contractor	Site establishment and duration of contract
Establish an appropriate Hazardous Store which is in	EPC Contractor	Site

Mitigation: Action/Control	Responsibility	Timeframe
accordance to the Hazardous Substance Amendment Act, No. 53 of 1992 this should include but not limited to: <ul style="list-style-type: none"> » Designated area; » All applicable safety signage; » Fire fighting equipment; » Enclosed by an impermeable bund; » Protected from the elements, » Lockable; » Ventilated; and » Has adequate capacity to contain 110% of the largest container contents. 		establishment
All unattended open excavations must be adequately demarcated and/or fenced (fencing shall consist of a minimum of three strands of wire wrapped with danger tape).	EPC Contractor	Site establishment, and duration of construction
Establish the necessary ablution facilities with chemical toilets and provide adequate sanitation facilities and ablutions for construction workers (1 toilet per every 15 workers) at appropriate locations on site.	EPC Contractor	Site establishment, and duration of construction
Ablution or sanitation facilities should not be located within 100 m from a watercourse/wetland or within the 1:100 year flood line.	EPC Contractor	Site establishment, and duration of construction
Supply adequate weather and vermin proof waste collection bins and skips (covered at minimum with secured Tarp/netting or shade-cloth) at site where construction is being undertaken. Separate labelled bins should be provided for general and hazardous waste. As far as possible, provision should be made for separation of waste for recycling.	EPC Contractor	Site establishment, and duration of construction

Performance Indicator	<ul style="list-style-type: none"> » Site is secure and there is no unauthorised entry. » No members of the public/ landowners injured. » Appropriate and adequate waste management and sanitation facilities provided at construction site.
Monitoring	<ul style="list-style-type: none"> » An incident reporting system must 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 must be immediately reported to the site manager.

b) OBJECTIVE: Appropriate management of the construction site and construction workers

The construction phase of the PV facility is expected to extend over a period of 15-18 months. Workers not residing in the area, including those required for skilled positions will be transported to site on a daily basis and will not be housed on site. However, the security team will be required on site at all times.

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.

Project Component/s	<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 inadequate or inappropriate facilities or procedures
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 area/s. » Types of materials or equipment and the manner in which they are stored or handled.
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
The location of the construction equipment camp and all access routes must take cognisance of any ecologically sensitive areas identified.	EPC Contractor	Pre-construction
The location of the construction equipment camp must be outside of identified sensitive areas.		
No temporary site camps may be established outside the footprint of the development area.	EPC Contractor	Construction
To minimise the footprint, temporary storage of equipment and materials on site should be kept to a minimum.	EPC Contractor	Construction

Mitigation: Action/Control	Responsibility	Timeframe
Staff must be supplied with adequate facilities aimed at preventing any kind of pollution.	EPC Contractor	Construction
Safety representatives, managers and workers must be trained in workplace safety. The construction process must be compliant with all safety and health measures as prescribed by the relevant Act.	EPC Contractor and sub-contractor/s	Duration of contract
Contractors must use chemical toilets/ablution facilities situated at designated areas of the site; no ablution activities will be permitted outside the designated areas. These facilities must be regularly serviced by appropriate contractors. A minimum of one toilet shall be provided per 15 persons at each working area such as the Contractor's camp	EPC Contractor and sub-contractor/s	Duration of contract
Ensure ablution facilities are appropriately maintained. Ablutions must be cleaned regularly and associated waste disposed of at a registered/permitted waste disposal site. Ablutions must be removed from site when construction is completed.	EPC Contractor	Site establishment, and duration of construction
Open fires on the site for heating, smoking or cooking are not allowed, except in designated areas.	EPC Contractor and sub-contractor/s	Duration of contract
Sub-Contractors appointed by the Contractor must ensure that all workers are informed at the outset of the construction phase of the conditions contained in the EMP and EA	EPC Contractor and sub-contractor/s	Construction
To limit the excessive clearance and destruction of vegetation the following must be implemented: <ul style="list-style-type: none"> » Identify and demarcate construction areas, servitudes, and access for general construction work and restrict construction activity to these areas. » 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 	EPC Contractor	Before and during construction
To limit the possible distribution of undesirable species and possible pollutants onto site: <ul style="list-style-type: none"> » Do not wash down any machinery or vehicle within the footprint area, unless in a designated wash bay area. » All materials moved onto the development site must be free of weeds or any other undesirable 	EPC Contractor	Before and during construction

Mitigation: Action/Control	Responsibility	Timeframe
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		
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	EPC Contractor, rehabilitation contractor	Construction
All work sites must be kept free of waste. No solid waste may be burned or buried on site or disposed of by any other method on site or within quarries or borrows pits. Solid waste (general waste) is to be transported to a licensed disposal facility for safe disposal by a permitted service provider. Waste Manifests must be retained as proof of responsible disposal and consolidated in a Waste Register.	EPC Contractor	Site establishment, and duration of construction
Hazardous substances and hazardous waste: Ensure compliance with all national, regional and local legislation with regard to the storage, handling and disposal of hydrocarbons, chemicals, solvents and any other harmful and hazardous substances and materials. The onus is on the Contractor to identify and interpret the applicable legislation. Hazardous waste to be disposed of at a registered h:H or H:H landfill site. Depending on the classification of the waste, a registered service provider with the necessary permits is to collect, transport and dispose of hazardous waste. Proof of appropriate disposal to be provided to the SHE Representative.	EPC Contractor	Site establishment, and duration of construction

Performance Indicator	<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 water resource areas » Appropriate waste management
Monitoring	<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 must be used to record non-conformances to the EMP, followed by the necessary action from Eskom to ensure full compliance

c) OBJECTIVE: Maximise local employment, skill development and business opportunities associated with the construction phase

Although limited, employment opportunities could be created during the construction phase (i.e. ~250-300), specifically for semi-skilled and unskilled workers. The unemployment rate in the study area is quite high and there are therefore various 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 of the proposed Lethabo solar energy facility and associated infrastructure
Potential Impact	The opportunities and benefits associated with the creation of local employment and business should be maximised.
Activity/risk source	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	Eskom should aim to employ as many low-skilled and semi-skilled workers from the local area as possible. This should also be made a requirement for all contractors.

Mitigation: Action/control	Responsibility	Timeframe
Employ local contractors that are compliant with Broad Based Black Economic Empowerment (BBBEE) criteria, where possible.	Eskom EPC Contractor	Preconstruction/ construction
Adopt a local employment policy to maximise the opportunities made available to the local labour force (preference to Ward 19, then the Metsimaholo Local Municipality area)	Eskom EPC Contractor	Preconstruction/ construction
In the recruitment selection process; consideration must be given to women during recruitment process	Eskom EPC Contractor	Preconstruction/ construction
Training and skills development programmes to be initiated prior to the commencement of the construction phase	Eskom EPC Contractor	Preconstruction/ construction
Source as much goods and services as possible from the local area (Metsimaholo Local Municipality). Engage with local authorities and business organisations to investigate the possibility of procurement of construction materials, goods	Eskom	Pre-construction & construction phase

and products from local suppliers where feasible		
Develop a database of local companies, specifically Historically Disadvantaged (HD) which qualify as potential service providers (e.g. construction companies, security companies, catering companies, waste collection companies, transportation companies etc.) prior to the tender process and invite them to bid for project-related work where applicable	Eskom EPC Contractor	Pre-construction & construction phase

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; » Employ as many semi and unskilled labour from the local area or local municipality as possible (preference to Ward 19, then the Metsimaholo Local Municipality area) » Training and skills development programme undertaken prior to the commencement of construction phase.
Monitoring	<ul style="list-style-type: none"> » The developer and EPC contractor must keep a record of local recruitments and information on local labour to be shared with the ECO for reporting purposes.

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

Even though the inflow of jobseekers is likely to occur, the probability of this issue becoming problematic and resulting in severe negative social impacts is seen to be improbable.

Other possible negative impacts due to the workforce's presence in the area and especially when jobseekers come to the area would include misconduct of workers, trespassing of workers on privately-owned farms, the possible increase in crime, littering, increase in traffic, increase in noise, the development of informal vending stations, and poaching of livestock.

Project component/s	Construction activities associated with the establishment of the solar energy facility, including infrastructure etc.
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.
Activity/risk source	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
The majority of the low-skilled workers should be sourced from the local area. This should be included in the tender documents. Construction workers should be recruited from the local area	EPC Contractor	Pre-construction/ construction
Identify local contractors who are qualified to undertake the required work.	EPC Contractor	Pre-construction/ construction
Develop a Code of Conduct to cover the activities of the construction workers housed on the site.	EPC Contractor	Pre-construction/ construction
Ensure that construction workers attend a brief session before they commence activities. 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.	EPC Contractor	Pre-construction/ construction
Ensure that all workers are informed at the outset of the construction phase of the conditions contained on the Code of Conduct.	EPC Contractor	Pre-construction/ construction
Ensure that construction workers who are found guilty of breaching the Code of Conduct are disciplined accordingly. All disciplinary hearings and/or dismissals must be in accordance with South African labour legislation.	EPC Contractor	Construction
Provide opportunities for workers to go home over weekends.	EPC Contractor	Construction
On completion of the construction phase all construction workers must be transported back to their place of origin within two days of their contract ending. The costs of transportation must be borne by the contractor.	EPC Contractor	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 where possible. » Code of Conduct drafted before commencement of construction phase. » Briefing session with construction workers held at outset of
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	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.

e) OBJECTIVE: To address safety and security issues during the construction phase

An inflow of workers could, 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	Construction of the proposed Lethabo solar energy facility and associated infrastructure
Potential Impact	Safety and security issues (such as increase in crime, increased fire risk) due to influx of non-local workforce and job seekers into the area
Activity/risk source	Safety and security risks associated with construction activities
Mitigation: Target/Objective	To avoid or minimise the potential impact on local communities and their livelihoods

Mitigation: Action/control	Responsibility	Timeframe
Access in and out of the construction site should be strictly controlled by a reputable security company	EPC contractor	Construction Phase
Open fires on the site for heating, smoking or cooking are not allowed, except in designated areas.	EPC contractor	Construction phase
Contractor must provide adequate fire fighting equipment on site and provide fire fighting training to selected construction staff.	EPC contractor	Construction phase
A comprehensive employee induction programme to be developed and utilised to cover land access protocols, fire management and road safety	EPC contractor	Construction phase
Method of communication should be implemented whereby local landowners can express any complaints or grievances with the construction process. A Community Liaison officer should be appointed as a grievance mechanism.	EPC Contractor	Construction phase

Performance Indicator	» Employee induction programme, covering land access protocols, fire management and road safety in place » The construction site is appropriately secured with a controlled
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	access system » Security company appointed and security procedures implemented » Designated areas for fires identified on site at the outset of the construction phase. » Fire fighting equipment and training provided before the construction phase commences. » Proven compensation claims settled within 1 month of claim being verified by Project Manager.
Monitoring	» The developer and EPC contractor must monitor the indicators listed above to ensure that they have been met for the construction phase

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

The construction phase of the project will be the most significant in terms of generating traffic impacts, resulting from the transport of equipment (including turbine 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.

The site can be accessed from the R716 regional road which lies west of the proposed site connecting Vereeniging to Deneyville. Within the site itself, access is already established and is used for the power station. These existing roads will be utilised for construction purposes (and later limited access for maintenance). Internal access roads between the project components will be required.

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	» 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
Implement the traffic management plan (compiled during design phase) for the site access roads to ensure that no hazards would result from the increased truck traffic and that traffic flow would not be adversely impacted (refer to Appendix G).	EPC Contractor	Construction
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.	EPC Contractor	Pre-construction/ Construction
Source general construction material and goods locally where available to limit transportation over long distances.	EPC Contractor	Pre-construction and construction
Appropriate dust suppression techniques must be implemented to minimise dust from gravel roads.	EPC Contractor	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.	EPC Contractor	Construction
Strict vehicle safety standards should be implemented and monitored.	EPC Contractor	Construction
Ensure All relevant permits for abnormal loads are obtained from the relevant authority before activity commences.	EPC Contractor (or appointed transportation contractor)	Pre-construction/ Construction
A designated access to the proposed site must be	EPC Contractor	Pre-

Mitigation: Action/Control	Responsibility	Timeframe
created to ensure safe entry and exit.		construction/ Construction
No deviation from approved transportation routes must be allowed, unless roads are closed for whatever reason outside the control of the contractor.	EPC 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.	EPC Contractor (or appointed transportation contractor)	Pre-construction/ Construction
Any traffic delays because of construction traffic must be co-ordinated with the appropriate authorities.	EPC Contractor	Duration of contract
The movement of all vehicles within the site must be on designated roadways.	EPC 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 for the duration of the construction period.	EPC Contractor	Duration of contract
Provide adequate and strategically placed traffic warning signs and control measures along the R716 and secondary roads to warn road users of the construction activities taking place, displaying road safety messages and speed limits for the duration of the construction phase. Traffic warning signs must also be well illuminated at night.	EPC Contractor	Duration of contract
Appropriate maintenance of all vehicles of the contractor must be ensured.	EPC 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.	EPC Contractor	Duration of contract
Keep new hard road surfaces as narrow as possible.	EPC Contractor	Duration of contract
To minimise impacts on local communities, consideration should be given to limiting construction vehicles travelling on public roadways during the morning and late afternoon commute time.	EPC Contractor	Duration of contract

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

g) OBJECTIVE: Effective management of concrete batching

Concrete is required during the construction of the solar energy facility. The bulk of the concrete will be supplied via ready mix trucks, with minimal concrete being mixed/batched on site.

Project component/s	» Batching of concrete
Potential Impact	<ul style="list-style-type: none"> » Dust emissions » Release of contaminated water » Generation of contaminated wastes from used chemical containers/cement bags » Inefficient use of resources resulting in excessive waste generation
Activity/risk source	<ul style="list-style-type: none"> » batching of concrete on unprotected ground » Packaging and other construction wastes » Storage of cement bags
Mitigation: Target/Objective	» To ensure that the operation of the batching plant does not cause pollution to the environment or harm to persons

Mitigation: Action/control	Responsibility	Timeframe
Batching of concrete must be undertaken on an impermeable surface (e.g. batching boards) to avoid ground contamination and pollution to surrounding environments.	EPC Contractor	Construction phase
Where possible, waste concrete should be used for construction purposes at the project site.	EPC Contractor	Construction phase
Empty cement bags should be collected and disposed appropriately as hazardous waste.	EPC Contractor	Construction phase
Washing of ready mix trucks and chutes are prohibited onsite unless in designated wash bay.	EPC Contractor	Construction phase

Performance Indicator	<ul style="list-style-type: none"> » No complaints on dust » No water or soil contamination by chemical spills » No complaints received regarding waste on site or indiscriminate dumping
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Monitoring	<ul style="list-style-type: none"> » Observation and supervision of chemical storage and handling practices » Observation and supervision of batching of concrete » Developer or appointed EO and ECO must monitor indicators listed above to ensure that they have been met for the construction phase
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h) OBJECTIVE: To avoid and or minimise the potential impacts of noise and dust and damage to roads caused by construction vehicles during the construction phase

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

Project component/s	Construction and establishment activities associated with the establishment of the solar energy facility, including infrastructure etc.
Potential Impact	Heavy vehicles can generate noise and dust impacts. Movement of heavy vehicles can also damage roads.
Activity/risk source	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 also minimise damage to roads.

Mitigation: Action/control	Responsibility	Timeframe
Areas to be cleared in a progressive manner. Road surfaces and other infrastructure to be constructed as soon as possible after vegetation clearing in order to minimise exposed ground surfaces, specifically roads which carry traffic.	EPC Contractor	Duration of contract
Implement dust suppression measures for heavy vehicles such as, for example, wetting roads on a regular basis .	EPC Contractor	Pre-construction/ construction
Ensuring that vehicles used to transport sand and building materials are fitted with tarpaulins or covers when on public roads.	EPC Contractor	Construction
Ensure that all vehicles are road-worthy, drivers are qualified and are made aware of the potential noise, dust and safety issues.	EPC Contractor	Pre-construction/ construction

Mitigation: Action/control	Responsibility	Timeframe
Ensure that drivers adhere to speed limits. Vehicles should be fitted with tracking devices to record when vehicles exceed the speed limit.	EPC Contractor	Pre-construction/ construction
Ensure that any damage to roads is repaired before completion of construction phase.	EPC Contractor	Construction

Performance Indicator	<ul style="list-style-type: none"> » Dust suppression measures implemented for all access roads 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 with assistance from the EO must monitor indicators listed above to ensure that they have been met for the construction phase.

i) OBJECTIVE: Minimisation of soil erosion and disturbance to topsoil and soil degradation

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 grassland vegetation not only protects the soil surface from direct raindrop impact, but 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.

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 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. The measures below indicate the minimum mitigation that will be required for Topsoil management and erosion control.

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"> » Rainfall and wind erosion » 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 » 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 » 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 » 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

Mitigation: Action/Control	Responsibility	Timeframe
The unnecessary clearance of vegetation must be prohibited. » Areas to be cleared must be clearly marked on-	EPC Contractor in consultation with Specialist	Pre-construction/ Construction

Mitigation: Action/Control	Responsibility	Timeframe
<p>site to eliminate the potential for unnecessary disturbance.</p> <ul style="list-style-type: none"> » All woody material cleared must be shredded to coarse chips, if possible to be used as mulch 		
<p>Construction activities must be restricted to demarcated areas so that impact on topsoil is minimised.</p>	EPC Contractor	Pre-construction, Construction and Operational phase
<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. » 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 » Topsoil should be removed (and stored) under dry conditions to avoid excessive compaction whenever topsoil will have to be stored for longer than one year. 	EPC Contractor	Pre-construction/ Construction
<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 topsoil 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 	Contractor	Pre-construction/ Construction

Mitigation: Action/Control	Responsibility	Timeframe
<p>the pile of topsoil storage needs to be, the shorter should be the time it is stored</p> <ul style="list-style-type: none"> » Topsoil handling should be reduced to stripping, piling (once), and re-application. Between the stockpiling and reapplication, stored topsoil should not undergo any further handling except control of erosion and (alien) invasive vegetation » 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 ponding 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 heights of topsoil at 2m to prevent wind erosion * 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 topsoil:</p> <ul style="list-style-type: none"> » Spoil materials and subsoil must be back-filled first, then covered with topsoil 	EPC Contractor	Pre-construction/ Construction

Mitigation: Action/Control	Responsibility	Timeframe
<ul style="list-style-type: none"> » Generally, topsoil 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 re-vegetation to be successful is approximately 20 cm » If the amount of topsoil available is limited, a strategy must be worked to out to optimise re-vegetation efforts with the topsoil available » Reapplied topsoil 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 re-vegetation efforts. » To stabilise reapplied topsoil 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 topsoil needs to be re-vegetated as soon as possible, following the specifications of the re-vegetation and rehabilitation plan.</p>	EPC Contractor	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 pipeline routes or roads and ensure measures to 	EPC Contractor	Construction monitored during operational phase

Mitigation: Action/Control	Responsibility	Timeframe
<p>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>Implement storm water management method statement, as part of the final design of the project and implement during construction and operation</p>	EPC Contractor	Construction monitored during operational phase
<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>	EPC Contractor	Construction monitored during operational phase
<p>All vehicles on site must be appropriate to access the site. No off-road driving is permitted.</p>	EPC Contractor	Construction monitored during operational phase

Mitigation: Action/Control	Responsibility	Timeframe
4x4s or diff lock vehicles must be used in wet slippery conditions to reduce the erosion on the roads and the surrounding area.	EPC Contractor	Construction monitored during operational phase

Performance Indicator	<ul style="list-style-type: none"> » Minimal disturbance outside of designated work areas. » Topsoil appropriately stored, managed, and rehabilitated. » Minimal level of soil erosion around site » Minimal level of increased siltation in drainage lines » 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 Protection Plan and Re-vegetation and Habitat Rehabilitation Plan)
Monitoring	<ul style="list-style-type: none"> » Monitoring of appropriate methods of vegetation clearing and soil management activities by ECO with assistance from the EO throughout construction phase. » 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 » Inspections of sediment control devices by ECO with assistance from the EO » Inspections of surroundings, including drainage lines by ECO with assistance from the EO. » Immediate reporting of ineffective sediment control systems

j) OBJECTIVE: Minimise loss of indigenous biodiversity, including plants of conservation concern

Prior to commencement of any activity, including earthworks (grading, road construction, etc.) within areas of natural vegetation a plant Search and Rescue program should be developed and implemented, preceded by a meticulous investigation of all footprint areas by a suitably qualified botanist, conducted during the optimal growing season (January to March) along the entire footprint area. A permit may be required should any listed plant species (such as ***Boophane disticha***) are disturbed or destroyed as a result of the proposed development.

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
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	<ul style="list-style-type: none"> » 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 remaining natural and semi-natural vegetation
Mitigation: Target/Objective	<ul style="list-style-type: none"> » Rescue, maintenance and subsequent replanting of at least all bulbous protected plant species within the specific land portion

Mitigation: Action/Control	Responsibility	Timeframe
All development footprints within areas of natural vegetation (for roads, buildings, underground cables, laydown areas and panel foundations) should be surveyed and appropriately fenced off. Only once this has been done can any construction activity proceed.	EPC Contractor	Duration of construction
<p>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. The necessary permits must be in place</p> <ul style="list-style-type: none"> » All development footprints must be surveyed and pegged out as soon as possible, after which a local horticulturist with Search and Rescue experience should be appointed to undertake the S&R. » All rescued species should be transplanted immediately as soon as possible. Replanting should occur in spring to early summer once sufficient rains have fallen, in order to facilitate establishment. » Replanting should occur in spring to early summer once sufficient rains have fallen, in order to facilitate establishment 	EPC Contractor	Duration of construction
It should be made very clear to all contractors that there is to be no disturbance outside these demarcated areas.	EPC Contractor	Duration of construction
Minimise large-scale clearance of natural vegetation and disturbance to the proposed site.	EPC Contractor	Duration of construction
Use existing and dedicated access roads to limit disturbance of the natural vegetation.	EPC Contractor	Duration of construction
Minimise damage to natural vegetation beyond the	EPC Contractor	Duration of

Mitigation: Action/Control	Responsibility	Timeframe
site during the construction of the power line and access road.		construction
Rehabilitate disturbed areas on completion of the construction phase. Details of the rehabilitation programme should be contained in the relevant EMPr. Rehabilitation targets must be set according to the original vegetation as described in the ecological specialist report.	EPC Contractor	Duration of construction
Prevent soil erosion originating from the site, according to soil erosion management plan.	EPC Contractor	Duration of construction
Monitor and control declared weeds and invader species. » Continually monitor the re-emergence of these species and manage according to the invasive species management plan	EPC Contractor	Duration of construction
All cable trenches, excavations, etc., through sensitive areas should be excavated carefully in order to minimise damage to surrounding areas and biodiversity. » The trenches must be checked on a daily basis for the presence of trapped animals. » Any animals found must be removed by a suitably qualified person in a safe manner, unharmed, and placed in an area where the animal will be comfortable. 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	EPC Contractor	Duration of construction

Performance Indicator	<ul style="list-style-type: none"> » Rescue and relocation of species of conservation concern » No damage or injury to fauna » Re-establishment of rescued species
Monitoring	<ul style="list-style-type: none"> » Minimal loss or disturbance of natural vegetation in and around the site. » Vehicles drive on dedicated roads with no disturbance of the surrounding natural vegetation. » Damage to the natural vegetation is minimised during the construction of associated infrastructure such as the power line and access roads. » 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

k) OBJECTIVE: Minimising the impact on Heritage sites

All development footprints within areas of natural vegetation (for roads, buildings, underground cables, laydown areas and panel foundations) should be surveyed and appropriately fenced off. Only once this has been undertaken can any construction activity proceed. It should be made very clear to all contractors that there is to be no disturbance outside these demarcated areas, at least not without the permission of the ECO.

Project Component/s	Solar Array, roads, power line and substation
Potential Impact	Discovery of graves
Activity/Risk Source	Solar array foundations, power line, substation foundations and roads
Mitigation: Target/Objective	Conserve fossil sites

Mitigation: Action/Control	Responsibility	Timeframe
Periodic monitoring of excavation activities during the construction period to ensure that no sub-surface deposits are missed.	EPC Contractor in consultation with Specialist	Duration of construction
A chance find procedure must be adopted if any graves or fossils finds are discovered during clearing of site and excavation. The procedure applies to the developer’s permanent employees, its subsidiaries, contractors and subcontractors, and service providers. The aim of this procedure is to establish monitoring and reporting procedures to ensure compliance with this EMPr and its associated procedures. Construction crews must be properly inducted to ensure they are fully aware of the procedures regarding chance finds as discussed below. » If during the pre-construction phase, construction, operations or closure phases of this project, any person employed by the developer, one of its subsidiaries, contractors and subcontractors, or service provider, finds any grave site, artefact of cultural significance or rock engraving, this person must cease work at the site of the find and report	EPC Contractor in consultation with Specialist	Duration of construction

Mitigation: Action/Control	Responsibility	Timeframe
this find to their immediate supervisor, and through their supervisor to the senior on-site manager. » It is the responsibility of the senior on-site Manager to make an initial assessment of the extent of the find, and confirm the extent of the work stoppage in that area. » The senior on-site Manager will inform the ECO of the chance find and its immediate impact on operations. The EO will then contact a professional archaeologist for an assessment of the finds who will notify the SAHRA.		

Performance Indicator	» No destruction of archaeological sites
Monitoring	» Monitoring of excavations during construction phase

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

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. The following listed alien invasive species (all category 1b) have been recorded on the study area:

- » *Cirsium vulgare*
- » *Datura stramonium*
- » *Gleditsia triacanthos*
- » *Verbena bonariensis*

Project Component/s	» Permanent and temporary infrastructure » Access roads
Potential Impact	» Impacts on natural vegetation » Impacts on soil » Impact on faunal habitats » Degradation and loss of agricultural potential
Activity/Risk Source	» 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 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 <ul style="list-style-type: none"> » This plan must contain WfW (Working for Water) - 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 re-vegetation 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 	EPC Contractor	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 	EPC Contractor	Construction phase Operational phase
<ul style="list-style-type: none"> » Immediately control any alien plants that become newly established using registered control measures 	EPC Contractor	Construction phase Operational phase
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	EPC Contractor	Construction phase Operational phase

Mitigation: Action/Control	Responsibility	Timeframe
distribution of weeds and invasive plants, establish a routine amongst contractors/all staff to regularly check: » that clothing and shoes are free of mud and seeds » radiator and grill, along wheel trims, around wheels, mud flaps, undercarriage of vehicle or other moving machinery for mud and seed		

Performance Indicator	» 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	» Ongoing monitoring of area by ECO during construction. » Ongoing monitoring of area by EO/SHE representative during operation » 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.

m) OBJECTIVE: The mitigation and possible negation of the additional visual impacts associated with the construction and operation 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 from a distance.

Mitigation:	Minimal visual intrusion by construction activities and intact
Target/Objective	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.	EPC Contractor	Construction phase.
Restrict the activities and movement of construction workers and vehicles to the immediate construction site and existing access roads.	EPC Contractor	Throughout the construction phase.
Ensure that rubble, litter, and disused construction materials are appropriately stored (if not removed daily) and then disposed regularly at licensed waste facilities.	EPC Contractor	Throughout the construction phase.
Reduce and control construction dust through the use of approved dust suppression techniques as and when required (i.e. whenever dust becomes apparent).	EPC Contractor	Throughout the construction phase.
Restrict construction activities to daylight hours in order to negate or reduce the visual impacts associated with lighting.	EPC Contractor	Throughout the construction phase.
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.	EPC Contractor	Throughout and at the end of the construction phase.

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.
Monitoring	» Monitoring of vegetation clearing during construction (by contractor as part of construction contract).

n). OBJECTIVE: Appropriate handling and management of waste

The main wastes expected to be generated by the construction of the solar energy facility will include general construction waste, hazardous waste (i.e. fuel), and liquid waste (including grey water and sewage)

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 Waste management Plan is included as **Appendix C** of this EMPr.

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

Mitigation: Action/Control	Responsibility	Timeframe
Construction method and materials should be carefully considered in view of waste reduction, re-use, and recycling opportunities.	EPC Contractor	Duration of contract
Construction contractors must provide specific detailed waste management plans to deal with all waste streams.	EPC Contractor	Duration of contract
Specific areas must be designated on-site for the temporary management of various waste streams, i.e. general refuse, construction waste (wood and metal scrap), and contaminated waste 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.	EPC 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 etc.).	EPC Contractor	Duration of contract
Disposal of waste must be in accordance with relevant legislative requirements, including the use of licensed	EPC Contractor	Duration of contract

Mitigation: Action/Control	Responsibility	Timeframe
contractors.		
Uncontaminated waste will be removed at least weekly for disposal; other wastes will be removed for recycling/disposal at an appropriate frequency.	EPC Contractor	Duration of contract
Disposal of waste will be in accordance with relevant legislative requirements, including the use of licensed contractors.	EPC Contractor	Duration of contract
Hydrocarbon waste must be contained and stored in sealed containers within an appropriately bunded area and clearly marked.	EPC 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.	EPC 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.	EPC Contractor	Duration of contract
SABS approved spill kits to be available and easily accessible.	EPC Contractor	Duration of contract
Regularly serviced chemical toilets facilities will be used to ensure appropriate control of sewage.	EPC Contractor	Duration of contract
Upon the completion of construction, the area must be cleared of potentially polluting materials.	EPC 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.	EPC 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.	EPC Contractor	Duration of construction
Implement an integrated waste management approach that is based on waste minimisation and incorporates reduction, recycling, re-use and disposal where appropriate.	EPC Contractor	Duration of construction
Upon the completion of construction, the area must be cleared of potentially polluting materials. Spoil stockpiles must also be removed and appropriately disposed of or the material re-used for an appropriate purpose.	EPC Contractor	Completion of construction

Performance Indicator	<ul style="list-style-type: none"> » No complaints received regarding waste on site or indiscriminate dumping. » Internal monitoring by the EO must be undertaken to ensure that waste segregation, recycling and reuse is occurring
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	<p>appropriately.</p> <ul style="list-style-type: none"> » 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. <p>An incident reporting system will be used to record non-conformances to the EMPr.</p>

o) OBJECTIVE: Appropriate handling and storage of chemicals and hazardous substances

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

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

Mitigation: Action/Control	Responsibility	Timeframe
Develop and implement an emergency preparedness plan during the construction phase.	EPC Contractor	Pre-construction and implement for duration of Contract
Any liquids stored on site, including admixtures, fuels and lubricants, should be stored in accordance with applicable legislation.	EPC Contractor	Construction phase
Establish an appropriate Hazardous Stores which is	EPC Contractor	Pre-construction

Mitigation: Action/Control	Responsibility	Timeframe
in accordance to the Hazardous Substance Amendment Act, No. 53 of 1992 this should include but not limited to: <ul style="list-style-type: none"> » Designated area; » All applicable safety signage; » Fire fighting equipment; » Enclosed by an impermeable bund; » Protected from the elements, » Lockable; » Ventilated; and Has adequate capacity to contain 110% of the largest container contents.		and implement for duration of Contract
Spill kits must be made available on-site for the clean-up of spills and leaks of contaminants.	EPC Contractor	Duration of contract
Corrective action must be undertaken immediately if a complaint is made, or potential/actual leak or spill of polluting substance identified. This includes stopping the contaminant from further escaping, cleaning up the affected environment as much as practically possible and implementing preventive measures.	EPC 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.	EPC Contractor	Duration of contract
Spilled cement must be cleaned up as soon as possible and disposed of at a suitably licensed waste disposal site.	EPC Contractor	Duration of contract
Any contaminated/polluted soil removed from the site must be disposed of at a licensed hazardous waste disposal facility.	EPC Contractor	Duration of contract
Routine servicing and maintenance of vehicles must not to take place on-site (except for emergencies). If repairs of vehicles must take place, an appropriate drip tray must be used to contain any fuel or oils.	EPC Contractor	Duration of contract
All stored fuels to be maintained within a bund and on a sealed surface as per the requirements of SABS 089:1999 Part 1.. 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.	EPC Contractor	Duration of contract
Fuel storage areas must be inspected regularly to ensure bund stability, integrity, and function.	EPC Contractor	Duration of contract
Construction machinery must be stored in an appropriately sealed area.	EPC Contractor	Duration of contract

Mitigation: Action/Control	Responsibility	Timeframe
No chemicals must be stored or vehicle maintenance undertaken within 350m of the temporal zone of wetlands, a drainage line or hillside wetlands.	EPC Contractor	Duration of contract
Oily water from bunds at the substations must be removed from site by licensed contractors.	EPC 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.	EPC Contractor	Duration of contract
Transport of all hazardous substances must be in accordance with the relevant legislation and regulations	EPC 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.	EPC Contractor	Duration of contract
An effective monitoring system must be put in place to detect any leakage or spillage of all hazardous substances during their transportation, handling, installation and storage.	EPC Contractor	
Precautions must be in place to limit the possibility of oil and other toxic liquids from entering the soil or clean stormwater system.	EPC Contractor	
Upon the completion of construction, the area must be cleared of potentially polluting materials.	EPC Contractor	Completion of construction

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

7.3 Detailing Method Statements

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

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

A Method Statement is defined as "a written submission by the Contractor in response to the environmental specification or a request by the Site Manager, setting out the plant, materials, labour and method the Contractor proposes using to conduct an activity, in such detail that the Site Manager is able to assess whether the Contractor's proposal is in accordance with the Specifications and/or will produce results in accordance with the Specifications". The Method Statement must cover applicable details with regard to:

- » 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.

Very specific areas to be addressed in the method statement: before, during and post construction includes:

- » Site Establishment plan (which explains all activities from induction training to offloading, construction sequence for site establishment and the different amenities and to be established etc. Including a site camp plan indicating all of these).
- » Preparation of the site (i.e. clearing vegetation, compacting soils and removing existing infrastructure and waste).

- » Soil management/stockpiling and erosion control.
- » Excavations and backfilling procedure and processes.
- » Stipulate norms and standards for water supply and usage (i.e.: comply strictly to licence and legislation requirements and restrictions as applicable).
- » Stipulate the storm water management procedures recommended in the storm water management plan.
- » Ablution facilities (placement, maintenance, management and servicing).
- » Solid Waste Management:
 - * Description of the waste storage facilities (on site and accumulative).
 - * Placement of waste stored (on site and accumulative).
 - * Management and collection of waste process.
 - * Recycle, re-use and removal process and procedure.
- » Liquid waste management:
 - * The design, establish, maintain and operate suitable procedures for pollution control facilities necessary to prevent discharge of water containing polluting matter or visible suspended materials into rivers, streams or existing drainage systems.
 - * Stipulate grey water (i.e. water from basins, showers, baths, kitchen sinks etc.) that needs to be disposed of, link into an existing facilities where possible. Where no facilities are available, grey water runoff must be controlled to ensure there is no seepage into wetlands or natural watercourses.
- » Dust and noise pollution:
 - * Describe necessary measures to ensure that noise from construction activities is maintained within lawfully acceptable levels (construction activities generating output levels of 85 dB(A) near human settlement, are to be confined to working hours (06h00 - 18h00) Mondays to Fridays).
 - * Procedure to control dust at all times on the site, access roads, borrow pits and spoil sites (dust control shall be sufficient so as not to have significant impacts in terms of the biophysical and social environments). These impacts include visual pollution, decreased safety due to reduced visibility, negative effects on human health and the ecology due to dust particle accumulation.
- » Hazardous substance storage (ensure compliance with all national, regional and local legislation with regard to the storage of oils, fuels, lubricants, solvents, wood treatments, bitumen, cement, pesticides and any other harmful and hazardous substances and materials. South African National Standards apply).
 - * List of all potentially hazardous substances to be used.
 - * Appropriate handling, storage and disposal procedures.
 - * Prevention plan of accidental contamination of soil at storage and handling areas.

- * All storage areas, (i.e.: for harmful substances appropriately banded with a suitable collection point for accidental spills must be implemented and drip trays underneath dispensing mechanisms including leaking engines/machinery).
- » Fire prevention and management measures on site.
- » Fauna and flora protection process on and off site (i.e.: removal to reintroduction or replanting, if necessary).
- » Rehabilitation and re-vegetation process.
- » Traffic management.
- » Incident and accident reporting protocol.
- » General administration (and stipulating that all documentation and licences must be on site at all times).
- » Designate access road and the protocol on while roads are in use.
- » Requirements of gate control protocols.

The Contractor may not commence the activity covered by the Method Statement until it has been approved by the Eskom's Construction Manager /Project Manager, except in the case of emergency activities and then only with the consent of the Site Manager. Approval of the Method Statement will not absolve the Contractor from their obligations or responsibilities in terms of their contract. Failure to submit a method statement may result in suspension of the activity concerned until such time as a method statement has been submitted and approved. The ECO should monitor the construction activities to ensure that these are undertaken in accordance with the approved Method Statement.

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

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

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

The Contractors obligations in this regard include the following:

- » All Employees must have a basic understanding of the key environmental features of the construction site and the surrounding environment. This includes the discussion/explanation of site environmental matters during toolbox talks.
- » The content and requirements of Method Statements are to be clearly explained to all plant operators and general workers. All staff acting in a supervisory capacity is to have copies of the relevant Method Statements and be aware of the content thereof.
- » Ensuring that a copy of the EMPr is readily available on-site, and that all senior site staff are aware of the location and have access to the document.
- » Senior site staff 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.
- » All sub-contractors must have a copy of the EMPr and sign a declaration/acknowledgement that they are aware and familiar with the contents and requirements of the EMPr and that they will conduct work in such a manner as to ensure compliance with the requirements of the EMPr.
- » Contractors and main sub-contractors should have a basic training in the identification of archaeological sites/objects, and protected flora and fauna that may be encountered on the site.

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:

7.4.1 Environmental Awareness Training

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

7.4.2 Induction Training

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

This induction training should include discussing the developer's environmental policy and values, the function of the 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 Representative/EO on site.

7.4.3 Toolbox Talks

Toolbox talks should be held on a scheduled and regular basis (at least twice a month) where foremen, environmental and safety representatives of different components of the Works and sub-consultants hold talks relating to environmental practices and safety awareness on site. These talks should also include discussions on possible common incidents occurring on site and the prevention of reoccurrence thereof. Records of attendance and the awareness talk subject must be kept on file.

7.5 Monitoring Programme: Construction Phase

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

A monitoring programme must be in place not only to ensure conformance with the 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 project Developer/Owner will determine and stipulate the period and frequency of monitoring required in consultation with relevant stakeholders and authorities. The Technical Director/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.

7.5.1 Non-Conformance Reports

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

The non-conformance report will be updated on completion of the corrective measures indicated on the finding sheet. The report must indicate that the

remediation measures have been implemented timeously and that the non-conformance can be closed-out to the satisfaction of the Site Manager and ECO.

7.5.2 Monitoring Reports

A monitoring report must 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.

7.5.3 Final Audit Report

Final environmental audit reports must be compiled by the ECO and be submitted to DEA upon completion of the construction and rehabilitation activities (within 30 days of completion of the construction phase (i.e. within 30 days of site handover) and another within 30 days of completion of rehabilitation activities. These reports must indicate the date of the audit, the name of the auditor and the outcome of the audit in terms of compliance with the environmental authorisation conditions and the requirements of the EMPr.

MANAGEMENT PROGRAMME: REHABILITATION

CHAPTER 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:

a) OBJECTIVE: 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.

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
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» A largely reduced vegetation cover will cause the ecosystem to be more prone to erosion and irreversible degradation

	<ul style="list-style-type: none"> » 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 	EPC Contractor,	During and after construction
Application of topsoil <ul style="list-style-type: none"> » Topsoil 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 » The final prepared surface shall be free of any pollution or any kind of contamination 	EPC Contractor,	During and after construction

Mitigation: Action/Control	Responsibility	Timeframe
<ul style="list-style-type: none"> » 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"> o 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 	EPC Contractor,	Construction phase Operational phase, followed up until desired end state is reached
Re-vegetation		
<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>	Developer and horticultural EPC Contractor	After construction, throughout operational phase
<p>Implement re-vegetation and rehabilitation plan (refer to Appendix E).</p> <ul style="list-style-type: none"> » Re-vegetation of the final prepared area is expected to occur spontaneously to some degree where topsoil could be re-applied within 6 months » Re-vegetation will be done according to an approved planting/landscaping plan according to the desirable end states and permissible vegetation 	EPC Contractor,	Construction phase Operational phase, followed up until desired end state is reached
<p>Re-seeding</p> <ul style="list-style-type: none"> » Re-vegetation can be increased where necessary by 	EPC Contractor,	Construction phase

Mitigation: Action/Control	Responsibility	Timeframe
<p>hand- seeding indigenous species</p> <ul style="list-style-type: none"> o previously collected and stored seeds shall be sown evenly over the designated areas, and be covered by means of rakes or other hand tools o commercially available seed of grass species naturally occurring on site can be used as alternative <p>» re-seeding shall occur at the recommended time to take advantage of the growing season</p> <p>» 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>		<p>Operational phase, followed up 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>EPC Contractor</p>	<p>Construction phase Operational phase, followed up until desired end state is reached</p>
<p>Traffic on re-vegetated 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>EPC Contractor,</p>	<p>Construction phase Operational phase</p>
<p>Establishment</p> <ul style="list-style-type: none"> » The establishment and new growth of re-vegetated 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>EPC Contractor,</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 re-vegetation and</p>	<p>ECO during</p>	<p>Construction</p>

Mitigation: Action/Control	Responsibility	Timeframe
take remedial actions as needed according to the respective plan » 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	construction, suitable designated person / contractor after that	phase Operational phase
Weeding » 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 	EPC Contractor	Construction phase Operational phase

Performance Indicator	<ul style="list-style-type: none"> » No activity in identified no-go areas » Natural configuration of habitats as part of ecosystems or cultivated land is retained 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
Monitoring	<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 EMPr. » 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. 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 the Operations Manager, and Environmental Manager for the operation phase of this project are detailed below.

The **Power Station 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 **Technical/SHEQ 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.

The Technical/SHEQ Manager must provide fourteen (14) days written notification the DEA that the activity operational phase will commence.

9.2. Objectives

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

a) OBJECTIVE: 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. » Environmental integrity of site undermined resulting in reduced visual aesthetics, erosion, compromised land capability and the requirement for on-going management intervention.
Activity/Risk	<ul style="list-style-type: none"> » Movement of employee vehicles within and around site.

Source	<ul style="list-style-type: none"> » 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 re-growth in non-operational areas of post-construction rehabilitation.

Mitigation: Action/Control	Responsibility	Timeframe
Existing roads must be maintained to ensure limited erosion and impact on areas adjacent to roadways.	Owner O&M Operator	Operation
An on-going invasive and alien plant monitoring and eradication programme must be implemented, where necessary	Owner O&M Operator	Operation
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	Owner in consultation with Specialist	After construction, throughout operational phase

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 re-growth/performance of rehabilitation efforts and weed infestation compared to natural/undisturbed areas.

b) OBJECTIVE: The mitigation and possible negation of visual impacts associated with the decommissioning of the Proposed Sirius Solar PV Project

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 (within 2.5km 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
Maintain the general appearance of the facility as a whole, including the panels, servitudes and the ancillary structures.	Owner O&M Operator	Throughout the operational phase.
Monitor the implementation of mitigation measures, and implement remedial action as and when required.	Owner O&M Operator	Throughout the operational phase.
Maintain roads and servitudes to forego erosion and to suppress dust.	Owner O&M Operator	Throughout the operational phase.
Monitor rehabilitated areas, and implement remedial action as and when required.	Owner O&M Operator	Throughout the operational phase.

Performance Indicator	Well maintained and neat facility with intact vegetation on and in the vicinity of the facility.
Monitoring	Monitoring of the entire site on an ongoing basis (by operator).

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

The soil on site may be impacted in terms of:

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

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

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 re-vegetation 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.	Owner O&M Operator	Operation
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).	Owner O&M Operator	Operation
Develop and implement an appropriate stormwater management plan for the operational phase of the facility	Owner O&M 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 environmental manager.
Monitoring	» Inspections of site on a bi-annual basis by the ECO

d) OBJECTIVE: Minimise dust and air emissions

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

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

Mitigation: Action/Control	Responsibility	Timeframe
Roads must be maintained to a manner that will ensure that nuisance to the community from dust is not visibly excessive.	Owner O&M Operator	Operation
Appropriate dust suppressant must be applied to the roads as required to minimise/control airborne dust.	Owner O&M Operator	Duration of contract
Speed of vehicles must be restricted, as defined by the Environmental Manager.	Owner O&M Operator	Duration of contract
Vehicles and equipment must be maintained in a road-worthy condition at all times.	Owner O&M Operator	Duration of contract

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

e) OBJECTIVE: Ensure the implementation of an appropriate fire management plan during the operation phase

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

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

Mitigation: Action/Control	Responsibility	Timeframe
Join the local Fire Protection Agency.	Owner O&M Operator	Operation
Provide adequate fire fighting equipment on site.	Owner O&M Operator	Operation
Provide fire-fighting training to selected operation and maintenance staff.	Owner O&M Operator	Operation
Ensure that appropriate communication channels are established to be implemented in the event of a fire.	Owner O&M 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, etc.).	Owner O&M 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.	Owner O&M Operator	Operation
Contact details of emergency services should be prominently displayed on site.	Owner O&M Operator	Operation

Performance Indicator	» Fire fighting equipment and training provided before the operational phase commences. » Appropriate fire breaks in place and maintained.
Monitoring	» The project developer must monitor indicators listed above to ensure that they have been met.

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

The facility is expected to be operational for more than 20 – 25 years during which time approximately ~50 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 can 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 etc.
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 approximately 50 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
Adopt a local employment policy to maximise the opportunities made available to the local labour force. (preference to Ward 19, then the Metsimaholo Local Municipality area)	Owner O&M Operator	Prior to commencement of operation
The recruitment selection process should seek to promote gender equality and the employment of women wherever possible		
Establish vocational training programs for the local labour force to promote the development of skills	Owner O&M Operator	Prior to commencement of operation

Performance Indicator	<ul style="list-style-type: none"> » Percentage of workers that were employed from local communities (preference to Ward 19, then the Metsimaholo Local Municipality area) » Number of people attending vocational training throughout the operation phase
Monitoring	» The project developer must monitor indicators listed above to ensure that they have been met for the operational phase.

g) OBJECTIVE: 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.

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

Mitigation: Action/Control	Responsibility	Timeframe
Hazardous substances (such as used/new transformer oils, etc.) must be stored in sealed containers within a clearly demarcated designated hazardous stores area.	Owner O&M Operator	Operation
Storage areas for hazardous substances must be appropriately sealed and banded.	Owner O&M 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.	O&M 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 banded area. Should any accidental spillage take place, it must be cleaned up according to specified standards	O&M Operator	Operation and maintenance

Mitigation: Action/Control	Responsibility	Timeframe
regarding bioremediation.		
Spill kits must be made available on-site for the clean-up of spills and leaks of contaminants.	O&M Operator	Operation and maintenance
Disposal of waste must be in accordance with relevant legislative requirements, including the use of licensed contractors.	O&M Operator/ waste management contractor	Operation
Waste handling, collection, and disposal operations must be managed and controlled by a waste management contractor.	O O&M perator/ waste management contractor	Operation
Used oils and chemicals: » 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	O&M Operator	Operation
General waste must be recycled where possible or disposed of at an appropriately licensed landfill.	O&M Operator	Operation
Hazardous waste (including hydrocarbons) and general waste must be stored and disposed of separately.	O&M Operator	Operation
Disposal of waste must be in accordance with relevant legislative requirements, including the use of licensed contractors.	O&M 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 operations manager » All appropriate waste disposal certificates must be maintained

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.

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 and Remove Infrastructure

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

10.3 Objectives

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 EMPr to be revisited and amended.

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

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

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

Mitigation: Action/control	Responsibility	Timeframe
Retrenchments should comply with South African Labour legislation of the day	Owner	At decommissioning
Undertake activities as prescribed by the legislation at the time of decommissioning and comply with all legal requirements administered by the competent authority at the time.	Owner	At decommissioning

Performance Indicator	» South African Labour legislation relevant at the time
Monitoring	» No occurrences of dismissals not in-line with South African Labour Legislation.

b) OBJECTIVE: The mitigation and possible negation of visual impacts associated with the decommissioning of the Proposed Lethabo Solar PV Energy Facility

Project Component/s	The solar energy facility and ancillary infrastructure (i.e. PV panels, access roads, substation, workshop, transformer, and power line).
Potential Impact	Visual impact of residual visual scarring and vegetation rehabilitation failure.
Activity/Risk Source	The viewing of the above mentioned by observers on or near the site.
Mitigation: Target/Objective	Only the infrastructure required for post decommissioning use of the site retained and rehabilitated vegetation in all disturbed areas.

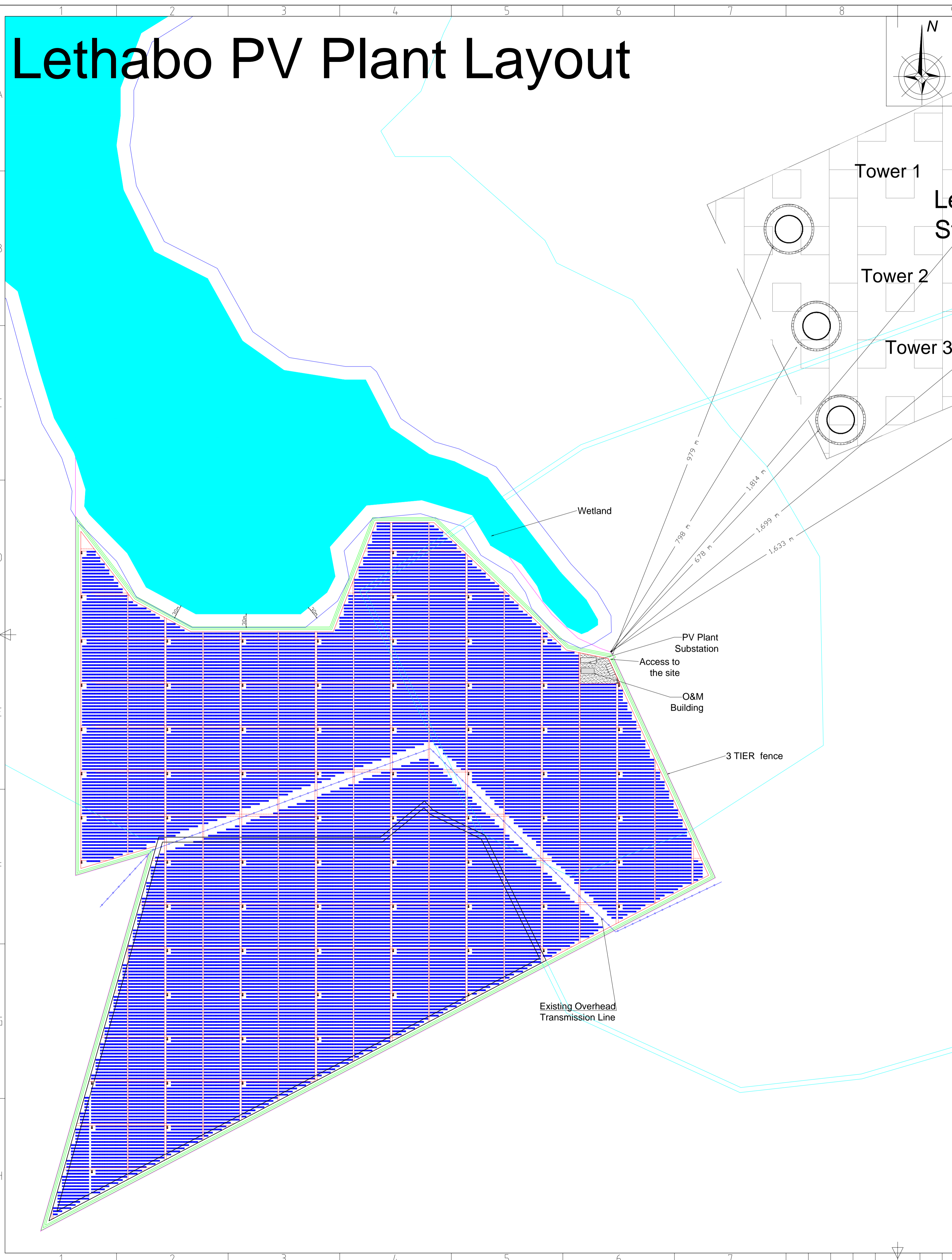
Mitigation: Action/control	Responsibility	Timeframe
Remove infrastructure not required for the post-decommissioning use of the site.	Owner O&M Operator	During the decommissioning phase.
Rehabilitate access roads and servitudes not required for the post-decommissioning use of the site. If necessary, an ecologist should be consulted to give input into	Owner O&M Operator	During the decommissioning phase.

Mitigation: Action/control	Responsibility	Timeframe
rehabilitation specifications.		
Monitor rehabilitated areas quarterly for at least a year following decommissioning, and implement remedial action as and when required.	Owner O&M Operator	Post decommissioning.

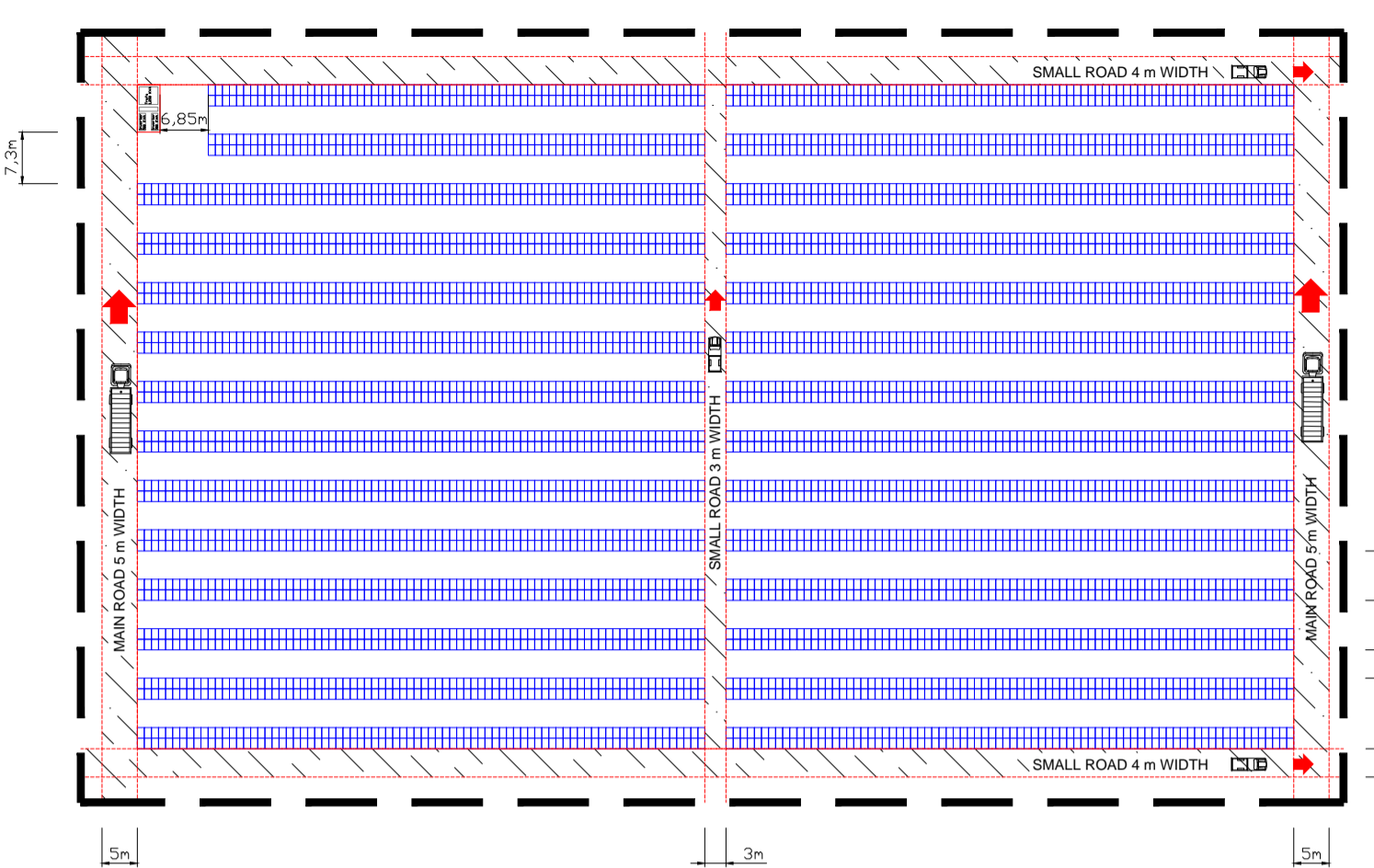
Performance Indicator	Vegetation cover on and in the vicinity of the site is intact (i.e. full cover as per natural vegetation within the environment) with no evidence of degradation or erosion.
Monitoring	Monitoring of rehabilitated areas quarterly for at least a year following decommissioning.

**APPENDIX A:
FINAL LAYOUT AND SENSITIVITY
MAPS**

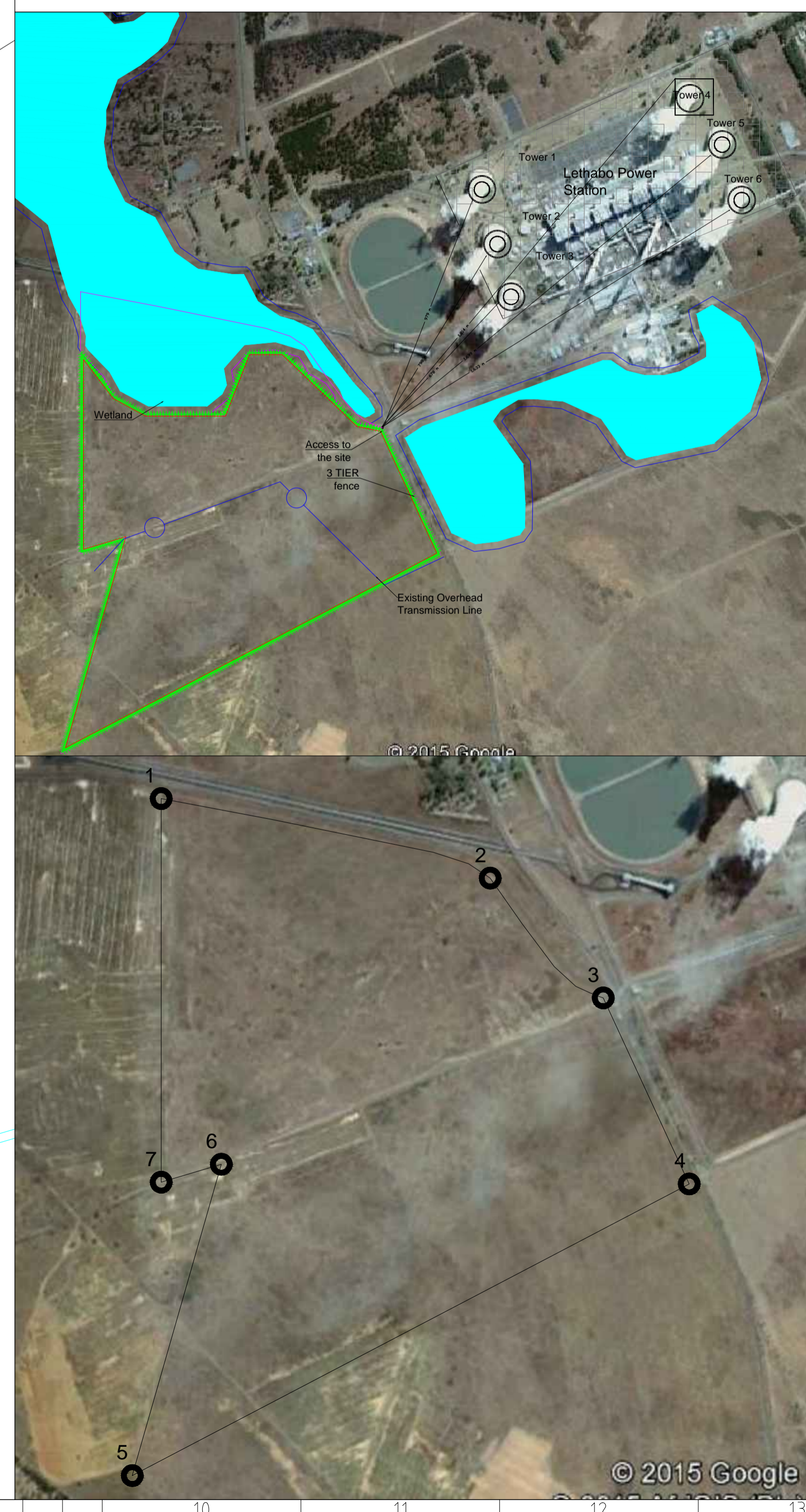
Lethabo PV Plant Layout



DETAIL- A



N.of modules per MVA: 4,400
Power Peak: 1,100 kWp



LEGEND

- PV ROW
- MV CABIN
- 3TIER FENCE
- EXISTING SUBSTATION
- SITE BOUNDARY
- OVERHEAD LINE
- WETLAND BUFFER
- INTERNAL/RING ROADS 3-5 M WIDTH
- ACCESS ROAD TO POWER STATION
- PV PLANT SUBSTATION (10 x 32 m)
- O&M BUILDING (35 x 13 m)
- PARKING AREA
- LAYDOWN CONSTRUCTION AREA
- WETLAND
- COOLING TOWERS 1-3

Lethabo PV Plant information

Total available area	162 ha
Foot print area	133 ha
Indicative capacity	73 MW

Site Corners Coordinates (UTM)

Cn. Nr.	Latitude	Longitude
1	-26.743908°	27.954480°
2	-26.745927°	27.963658°
3	-26.748938°	27.966951°
4	26.753774°	27.969474°
5	-26.759884°	27.954130°
6	-26.753094°	27.956176°
7	-26.753530°	27.954542°

REVISIONS	NAME	DATE	NOTE
01			
02			

ESKOM HOLDING LIMITED
GROUP TECHNOLOGY
ESKOM ENTERPRISES PARK



NAME	DATE
PREPARED	Ciro Rapicano 26/08/2015
DRAWN	Ciro Rapicano 04/10/2015
CHECKED	Sujit Thakuri 07/10/2015
ACCEPTED	
SHEET SIZE	DIN A1
SUPERSEDED BY DRWG. NO.:	

Lethabo PV Plant Indicative Layout

CAD-FILE	SCALE
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Protection mark DIN 34 - 1 - E:
Copying of this drawing, and giving it to others and the use or communication of the contents thereof, are forbidden without express authority. Offenders are liable to the payment of damages. All rights are reserved in the event of the grant of a patent or the registration of a utility model or design.

Lethabo Solar Energy Facility

Environmental sensitivity map

Legend

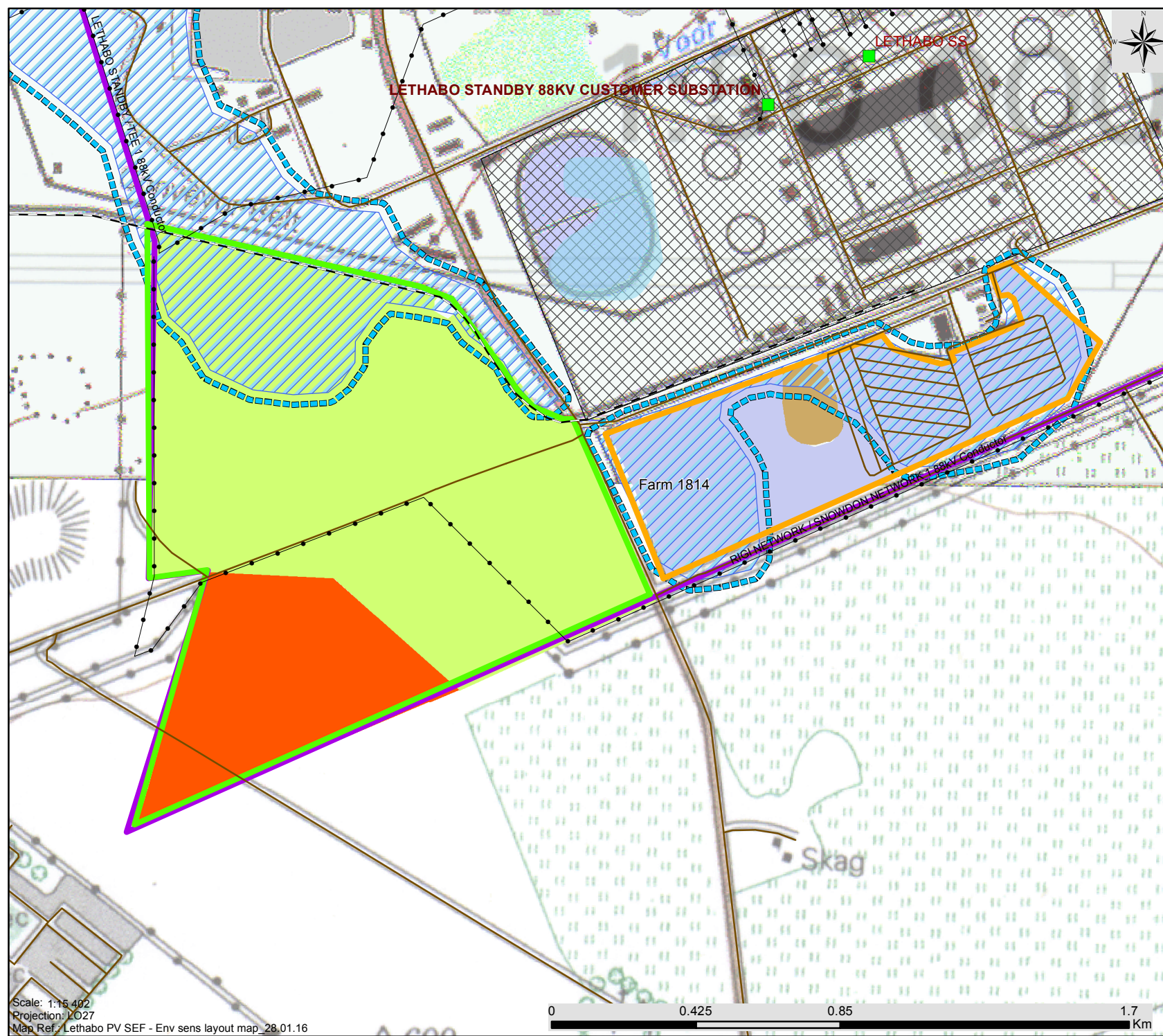
- Eskom Substation
- Existing Powerline
- Railway Line
- Regional road
- Secondary road
- Other access roads
- Perennial river
- - - Non Perennial river

Proposed PV solar sites:

- Alternative PV site 1
- Alternative PV site 2
- Affected farm portion
- Lethabo Power Station

Environmental Sensitivities:

- Wetlands (No-go area)
- Wetland buffer (30m_No-go area)
- NFEPA wetlands/waterbody
- Conyza podocephala Grassland (Medium Ecological Sensitivity)
- Conyza podocephala Grassland (Low Ecological Sensitivity)
- Verbena bonariensis Grassland (Low Ecological Sensitivity)
- Digitaria eriantha Transformed Grassland (Low Ecological Sensitivity)



Scale: 1:15 402
 Projection: LO27
 Map Ref: Lethabo PV SEF - Env sens layout map_28.01.16



**APPENDIX B:
GRIEVANCE MECHANISM FOR
PUBLIC COMPLAINTS AND ISSUES**

GRIEVANCE MECHANISM / PROCESS

PURPOSE

This Grievance Mechanism has been developed to receive and facilitate resolution of concerns and grievances about the Project's environmental and social performance. The aim of the grievance mechanism is to ensure that grievances or concerns raised by local landowners and or communities are addressed in a manner that:

- » Provides a predictable, transparent, and credible process to all parties, resulting in outcomes that are seen as fair, effective, and lasting.
- » Builds trust as an integral component of broader community relations activities.
- » Enables more systematic identification of emerging issues and trends, facilitating corrective action and pre-emptive engagement.

The aim of this Grievance Mechanism is to address grievances in a manner that does not require a potentially costly and time consuming legal process.

PROCEDURE FOR RECEIVING AND RESOLVING GRIEVANCES

- » Local landowners, communities and authorities must be informed in writing by the Proponent of the grievance mechanism and the process by which grievances can be brought to the attention of the Proponent through its designated representative.
- » A company representative must be appointed as the contact person for grievances to be addressed to. The name and contact details of the contact person must 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 must be registered with the contact person who, within 2 working days of receipt of the grievance, must contact the Complainant to discuss the grievance and agree on suitable date and venue for a meeting in order to discuss the grievances raised. Unless otherwise agreed, the meeting should be held within 2 weeks of receipt of the grievance.
- » The contact person must 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 (once agreed).
- » Prior to the meeting being held the contact person must contact the Complainant to discuss and agree on the parties 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 should be chaired by the Proponent's representative appointed to address grievances. The Proponent must provide a person to take minutes of and record the meeting/s. Any costs associated with hiring venues must be covered by the Proponent.
- » Draft copies of the minutes must 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 must 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 must 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, must identify the preferred mediator and agree on a date for the next meeting. The cost of the mediator must be borne by the Proponent. The Proponent must 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 must 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 must prepare a draft report that summarises 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 must 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.

A Complaint is closed out when no further action can be or needs to be taken. Closure status will be classified in the Complaints Register as follows:

- » Resolved. Complaints where a resolution has been agreed and implemented and the Complainant has signed the Confirmation Form.
- » Unresolved. Complaints where it has not been possible to reach an agreed resolution and the case has been authorised for close out by the Appeals Committee.
- » Abandoned. Complaints where the Complainant is not contactable after one month following receipt of a Complaint and efforts to trace his or her whereabouts have been unsuccessful.

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 C:
WASTE MANAGEMENT PLAN**

WASTE MANAGEMENT PLAN

1. PURPOSE

A Waste Management Plan (WMP) plays a key role in achieving sustainable waste management throughout all phases of the project. The plan prescribes measures for the collection, temporary storage and safe disposal of the waste streams associated with the project and includes provisions for the recovery, re-use and recycling of waste. The purpose of this plan is therefore to ensure that effective procedures are implemented for the handling, storage, transportation and disposal of waste that is generated from the project activities on site.

This WMP has been compiled as part of the project Environmental Management Programme (EMPr) and includes waste stream information available at the time of compilation. Construction practices and operations must be measured and analysed on an ongoing basis in order to determine the efficacy of the plan and whether further revision of the plan is required. This plan should be further updated should further detail regarding waste quantities and categorisation become available, during the construction and/or operational stages.

2. RELEVANT ASPECTS OF THE SITE

It is expected that the development of the Lethabo PV Solar Energy Facility will generate construction solid waste, general waste, contaminated water and soil.

Waste generated on site, originates from various sources including but not limited to:

- » Concrete waste generated from removal foundations, spoil and excess concrete.
- » Contaminated water, soil and vegetation due to hydrocarbon spills.
- » Hazardous waste from vehicle, equipment and machinery parts (oil cans, filters, rags etc), and servicing.
- » Hazardous waste from, flouresent tubes, broken PV panels, used hydrocarbon containers, and waste ink carteridges.
- » Recycable waste in the form of paper, glass, steel, aluminium, wood/ wood pallets, plastic (PET bottles, PVC, LDPE), cardboard.
- » Organic waste from food waste and alien vegetation removal.
- » Sewage from portable toilets and septic tanks.
- » Inert waste from spoil material from site clearence and trenching works.

3. LEGISLATIVE REQUIREMENTS

Waste in South Africa is currently governed by means of a number of pieces of legislation, including:

- » National Environmental Management: Waste Act (NEM:WA), 2008 (Act 59 of 2008)
- » National Environmental Management: Waste Amendment Act, 2014 (Act 26 of 2014)
- » The South African Constitution (Act 108 of 1996)
- » Hazardous Substances Act (Act 5 of 1973)
- » Health Act (Act 63 of 1977)
- » Environment Conservation Act (Act 73 of 1989)
- » Occupational Health and Safety Act (Act 85 of 1993)
- » National Water Act (Act 36 of 1998)
- » The National Environmental Management Act (Act 107 of 1998) (as amended)
- » Municipal Structures Act (Act 117 of 1998)
- » Municipal Systems Act (Act 32 of 2000)
- » Mineral and Petroleum Resources Development Act (Act 28 of 2002)
- » Air Quality Act (Act 39 of 2004)

Storage of waste must be undertaken in accordance with the National Norms and Standards for the Storage of Waste published in GN926.

4. WASTE MANAGEMENT PRINCIPLES

An integrated approach to waste management on site is needed. Such an approach is illustrated in the Figure 1.

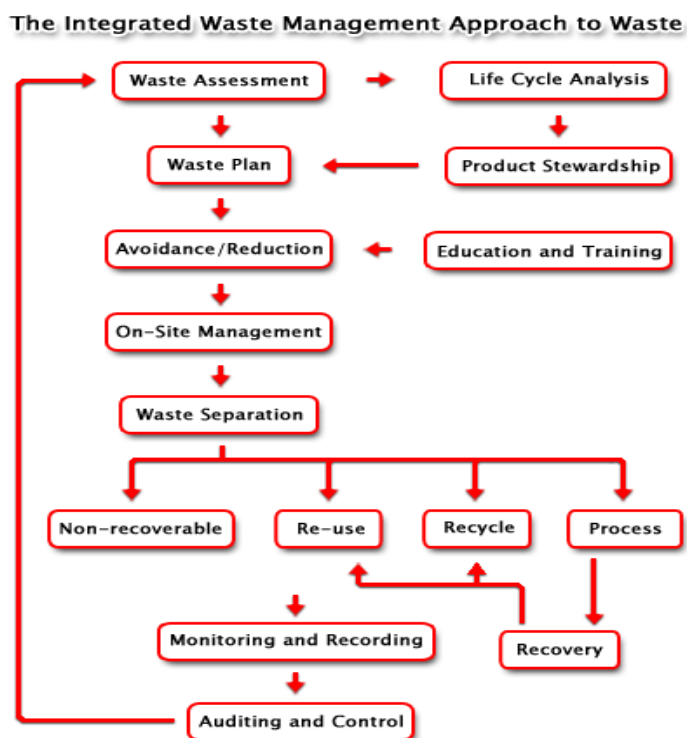


Figure 1: Integrated Waste Management Flow Diagram

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

It is important to ensure that waste is managed with the following objectives in mind during all phases of the project:

- » Reducing volumes of waste is a priority;
- » If reduction is not feasible, the maximum amount of waste is to be recycled; and
- » Waste that cannot be recycled is to be disposed of in the most environmentally responsible manner as possible.

4.1. Construction phase

A plan for the management of waste during construction waste is detailed below. As previously stated, construction practices must be measured and analysed in order to determine the efficacy of the plan and whether further revision of the plan is required. A Method Statement detailing specific waste management practices during construction should be prepared by the Contractor prior to the commencement of construction.

4.1.1. Waste Assessment / Inventory

- » The Environmental Officer (EO), or designated staff member, must develop, implement and maintain a waste inventory reflecting all waste generated during construction for both general and hazardous waste streams.
- » Construction method and materials should be carefully considered in view of waste reduction, re-use, and recycling opportunities.
- » Once a waste inventory has been established, targets for recovery of waste (minimisation, re-use, recycling) should be set.
- » The EO must conduct waste classification and rating in terms of SANS 10288 and Government Notice 634 published under the NEM: WA.

4.1.2. Waste collection, handling and storage

- » It is the responsibility of the EO to ensure that each subcontractor implements their own waste recycling system, i.e. separate bins for food waste, plastics, paper, wood, glass cardboard, metals, etc.
- » Septic tanks and portable toilets must be monitored and maintained daily. Below ground storage of septic tanks must withstand the external forces of the surrounding environment. The area above the tank must be demarcated to prevent any vehicles or heavy machinery from driving around the area.
- » Waste collection bins and hazardous waste containers must be provided by the principal contractor and subcontractors and placed at various areas around site for the storage of organic, recyclable and hazardous waste.
- » A dedicated waste area must be established on site for the storage of all waste streams, before removal from site. The storage period must not trigger listed waste activities as per the NEMWA, GN 921 of November 2013.
- » Signage/ colour coding must be used to differentiate disposal areas for the various waste streams (i.e. paper, cardboard, metals, food waste, glass etc.).
- » Hazardous waste must be stored within a bunded area constructed according to SABS requirements. The volume of waste stored in the bunds must not exceed 110% of the bund capacity.
- » The location of all temporary waste storage areas must aim to minimise the potential for impact on the surrounding environment, including prevention of contaminated runoff, seepage, and vermin control.
- » Waste storage shall be in accordance with all Regulations and best-practice guidelines and under no circumstances may waste be burnt on site.
- » If possible a dedicated waste management team must be appointed by the principal contractors' EO, whom will be responsible for ensuring the continuous sorting of waste and maintenance of the area. The waste management team must be trained in all areas of waste management and monitored by the EO.
- » All waste removed from site must be done so by a registered/ licensed subcontractor, whom must supply information regarding how waste recycling/

disposal will be achieved. The registered subcontractor must provide waste manifests for all removals at least once a month or for every disposal made.

4.1.3. Management of waste storage areas

- » The position of all waste storage areas must be located at least 32m away from water courses and ensure minimal degradation to the environment. The main waste storage area must have a suitable storm water system separating clean and dirty storm water.
- » Collection bins placed around site and at subcontractors' camps (if at a different location than the main site camp) must be maintained and emptied on a regular basis by the principal contractor.
- » Inspections and maintenance of the main waste storage area must be undertaken daily. Skips and storage containers must be clearly marked or colour coded and well-maintained, not allowing access to vermin or other rodents. A Tarp or Shade cloth should ideally be used to ensure avifauna does not have access to waste.
- » Waste must be stored in designated containers and not on the ground.
- » Inspections and maintenance of bunds must be undertaken daily. Bunds must be inspected for leaks or cracks in the foundation and walls.
- » It is assumed that any rainwater collected inside the bund is contaminated and must be removed and stored as hazardous waste, and not released into the environment. If any leaks occur in the bund, these must be removed immediately.

4.1.4. Disposal

- » Waste generated on site must be removed on a regular basis, as determined by the EO and ECO. This frequency may change during construction depending on waste volumes generated at different stages of the construction process.
- » Waste must be removed by a suitably qualified contractor and disposed at an appropriately licensed landfill site. Proof of appropriate disposal must be provided by the contractor to the EO and ECO.

4.1.5. Record keeping

The success of the Waste Management 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.

- » Documentation (waste manifest, certificate of issue or safe disposal) must be kept detailing the quantity, nature, and fate of any regulated waste for audit purposes.
- » Waste management must form part of the monthly reporting requirements in terms of volumes generated, types, storage and final disposal.

4.1.6. Training

Training and awareness regarding waste management shall be provided to all employees and contractors as part of the toolbox talks or on-site awareness sessions with the EO and at the frequency as set out by the ECO.

5. Operational phase

It is expected that the operational phase will result in the production of limited amounts of general waste consisting mostly of cardboard, paper, plastic, tins, metals and a variety of synthetic compounds. Limited amounts of hazardous wastes (grease, oils) may also be generated. All waste generated will be required to be temporarily stored at the facility in appropriate sealed containers prior to disposal at a permitted landfill site.

The following waste management principles apply during the operational phase:

- » The SHE Manager must develop, implement and maintain a waste inventory reflecting all waste generated during operation for both general and hazardous waste streams.
- » Adequate waste collection bins at site must be supplied. Separate bins should be provided for general and hazardous waste.
- » Recyclable waste must be removed from the waste stream and stored separately.
- » All waste must be stored in appropriate temporary storage containers (separated between different construction wastes, and contaminated or wet waste).
- » Waste storage shall be in accordance with all best-practice guidelines and under no circumstances may waste be burnt on site.
- » Waste generated on site must be removed on a regular basis throughout the operational phase.
- » Waste must be removed by a suitably qualified contractor and disposed at an appropriately licensed landfill site. Proof of appropriate disposal must be provided by the contractor and kept on site.

6. Monitoring of Waste Management Activities

Records must be kept of the volumes/ mass of the different waste streams that are collected from the site throughout the life of the project. The appointed waste contractor is to provide monthly reports to the operator containing the following information:

- » Monthly volumes/ mass of the different waste streams collected;
- » Monthly volumes/ mass of the waste that is disposed of at a landfill site;
- » Monthly volumes/ mass of the waste that is recycled;
- » Data illustrating progress compared to previous months.

This report will aid in monitoring the progress and relevance of the waste management procedures that are in place. If it is found that the implemented procedures are not as effective as required, this WMP is to be reviewed and amended accordingly. This report must form part of the EO's reports to the ECO on a monthly basis.

**APPENDIX D:
ALIEN INVASIVE MANAGEMENT
PLAN**

ALIEN PLANT AND OPEN SPACE MANAGEMENT PLAN

1. PURPOSE

Invasive alien species pose the second largest threat to biodiversity after direct habitat destruction. The purpose of this Alien Plant Management Plan is to provide a framework for the management of alien and invasive plant species during the construction and operation of the Lethabo PV Solar Energy Facility. The broad objectives of the plan includes the following:

- » Ensure alien plants do not become dominant in parts or the whole site, through the control and management of alien and invasive species presence, dispersal & encroachment.
- » Develop and implement a monitoring and eradication programme for alien and invasive species.
- » Promote the natural re-establishment and planting of indigenous species in order to retard erosion and alien plant invasion.

2. RELEVANT ASPECTS OF THE SITE

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.

The following listed alien invasive species (all Category 1b) have been recorded on the study area:

- » *Cirsium vulgare*
- » *Datura stramonium*
- » *Gleditsia triacanthos* (Figure 11)
- » *Verbena bonariensis*

3. LEGISLATIVE CONTEXT

Conservation of Agricultural Resources Act (Act No. 43 of 1983)

In terms of the amendments to the regulations under the Conservation of Agricultural Resources Act (Act No. 43 of 1983), all declared aliens must be effectively controlled. Landowners are legally responsible for the control of invasive alien plants on their properties. In terms of this Act, over 260 alien invasive plant species have been recorded up to date within the grid representative of the Lethabo PV Solar Energy Facility. 22 of these species could be confirmed on the site and ascribed to one of the following categories:

- » Category 1: Prohibited and must be controlled.

- » Category 2 (commercially used plants): May be grown in demarcated areas provided that there is a permit and that steps are taken to prevent their spread.
- » Category 3 (ornamentally used plants): May no longer be planted. Existing plants may be retained as long as all reasonable steps are taken to prevent the spreading thereof, except within the flood line of watercourses and wetlands.

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

The National Environmental Management: Biodiversity Act (NEM:BA) regulates all invasive organisms in South Africa, including a wide range of fauna and flora. Regulations have been published in Government Notices R.506, R.507, R.508 and R.509 of 2013 under NEMBA. According to this Act and the regulations, any species designated under Section 70 cannot be propagated, grown, bought or sold without a permit. Below is an explanation of the three categories:

- » Category 1a: Invasive species requiring compulsory control. Any specimens of Category 1a listed species need, by law, to be eradicated from the environment. No permits will be issued.
- » Category 1b: Invasive species requiring compulsory control as part of an invasive species control programme. Remove and destroy. These plants are deemed to have such a high invasive potential that infestations can qualify to be placed under a government sponsored invasive species management programme. No permits will be issued.
- » Category 2: Invasive species regulated by area. A demarcation permit is required to import, possess, grow, breed, move, sell, buy or accept as a gift any plants listed as Category 2 plants. No permits will be issued for Cat 2 plants to exist in riparian zones.
- » Category 3: Invasive species regulated by activity. An individual plant permit is required to undertake any of the following restricted activities (import, possess, grow, breed, move, sell, buy or accept as a gift) involving a Category 3 species. No permits will be issued for Cat 3 plants to exist in riparian zones.

The following guide is a useful starting point for the identification of alien species: Bromilow, C. 2010. Problem Plants and Alien Weeds of South Africa. Briza, Pretoria.

It is important to note that alien species that are regulated in terms of the Conservation of Agricultural Resources Act (Act 43 of 1983) (CARA) as weeds and invader plants are exempted from NEM:BA. This implies that the provisions of the CARA in respect of listed weed and invader plants supersede those of NEM:BA.

4. ALIEN PLANT MANAGEMENT PRINCIPLES

4.1. Prevention and early eradication

A prevention strategy should be considered and established, including regular surveys and monitoring for invasive alien plants, effective rehabilitation of disturbed areas and prevention of unnecessary disturbance of natural areas.

Monitoring plans should be developed which are designed to identify Invasive Alien Plant Species shortly after they arrive in the project area. Keeping up to date on which weeds are an immediate threat to the site is important, but efforts should be planned to update this information on a regular basis. When new Invasive Alien Plant Species are recorded on site, an immediate response of locating the site for future monitoring and either hand-pulling the weeds or an application of a suitable herbicide should be planned. It is, however, better to monitor regularly and act swiftly than to allow invasive alien plants to become established on site.

4.2. Containment and control

If any alien invasive plants are found to become established on site, action plans for their control should be developed, depending on the size of the infestations, budgets, manpower considerations and time. Separate plans of control actions should be developed for each location and/or each species. Appropriate registered chemicals and other possible control agents should be considered in the action plans for each site/species. The key is to ensure that no invasions get out of control. Effective containment and control will ensure that the least energy and resources are required to maintain this status over the long-term. This will also be an indicator that natural systems are impacted to the smallest degree possible.

4.3. General Clearing & Guiding Principles

Alien control programs are long-term management projects and should include a clearing plan which includes follow up actions for rehabilitation of the cleared area. The lighter infested areas should be cleared first to prevent the build-up of seed banks. Pre-existing dense mature stands ideally should be left for last, as they probably won't increase in density or pose a greater threat than they are currently. Collective management and planning with neighbours may be required in the case of large woody invaders as seeds of aliens are easily dispersed across boundaries by wind or water courses. All clearing actions should be monitored and documented to keep records of which areas are due for follow-up clearing.

i. Clearing Methods

Different species require different clearing methods such as manual, chemical or biological methods or a combination of both. Care should however be taken that the clearing methods used do not encourage further invasion. As such, regardless of the methods used, disturbance to the soil should be kept to a minimum.

Fire should not be used for alien control or vegetation management at the site. The best-practice clearing method for each species identified should be used.

» Mechanical control

This entails damaging or removing the plant by physical action. Different techniques could be used, e.g. uprooting, felling, slashing, mowing, ringbarking or bark stripping. This control option is only really feasible in sparse infestations or on small scale, and for controlling species that do not coppice after cutting. Species that tend to coppice, need to have the cut stumps or coppice growth treated with herbicides following the mechanical treatment. Mechanical control is labour intensive and therefore expensive, and could cause severe soil disturbance and erosion.

» Chemical Control

Although it is usually preferable to use manual clearing methods where possible, such methods may create additional disturbance which stimulates alien invasion and may also be ineffective for many woody species which resprout. Where herbicides are to be used, the impact of the operation on the natural environment should be minimised by observing the following:

- * Area contamination must be minimised by careful, accurate application with a minimum amount of herbicide to achieve good control.
- * All care must be taken to prevent contamination of any water bodies. This includes due care in storage, application, cleaning equipment and disposal of containers, product and spray mixtures.
- * Equipment should be washed where there is no danger of contaminating water sources and washings carefully disposed of in a suitable site.
- * To avoid damage to indigenous or other desirable vegetation, products should be selected that will have the least effect on non-target vegetation.
- * Coarse droplet nozzles should be fitted to avoid drift onto neighbouring vegetation.
- * The appropriate health and safety procedures should also be followed regarding the storage, handling and disposal of herbicides.

For all herbicide applications, the following Regulations and guidelines should be followed:

- * Working for Water: Policy on the Use of Herbicides for the Control of Alien Vegetation.
- * Pesticide Management Policy for South Africa published in terms of the Fertilizers, Farm Feeds, Agricultural Remedies and Stock Remedies Act, 1947 (Act No. 36 of 1947) – GNR 1120 of 2010.
- * South African Bureau of Standards, Standard SANS 10206 (2010)

According to Government Notice No. 13424 dated 26 July 1992, it is an offence to “acquire, dispose, sell or use an agricultural or stock remedy for a purpose or in a manner other than that specified on the label on a container thereof or on such a container”.

Contractors using herbicides need to have a valid Pest Control Operators License (limited weeds controller) according to the Fertilizer, Farm Feeds, Agricultural Remedies and Stock Remedies Act (Act No. 36 of 1947). This is regulated by the Department of Agriculture, forestry and Fisheries.

» **Biological control**

Biological weed control consists in the use of natural enemies to reduce the vigour or reproductive potential of an invasive alien plant. Biological control agents include insects, mites, and micro-organisms such as fungi or bacteria. They usually attack specific parts of the plant, either the reproductive organs directly (flower buds, flowers or fruit) or the seeds after they have dropped. The stress caused by the biological control agent may kill a plant outright or it might impact on the plants reproductive capacity. In certain instances, the reproductive capacity is reduced to zero and the population is effectively sterilised. All of these outcomes will help to reduce the spread of the species.

To obtain biocontrol agents, provincial representatives of the Working for Water Programme or the Directorate: Land Use and Soil Management (LUSM), Department of Agriculture, Forestry and Fisheries (DAFF) can be contacted.

4.4. General management practices

The following general management practices should be encouraged or strived for:

- » Establish an ongoing monitoring programme for construction phase to detect and quantify any alien species that may become established and identify the problem species.
- » Alien vegetation regrowth on areas disturbed by construction must be immediately controlled once recorded throughout the entire site during construction and operation.
- » Care must be taken to avoid the introduction of alien invasive plant species to the site. Particular attention must be paid to imported material such as building sand

or dirty earth-moving equipment. Stockpiles should be checked regularly and any weeds emerging from material stockpiles should be removed.

- » Cleared areas that have become invaded by alien species can be sprayed with appropriate herbicides provided that these are such that break down on contact with the soil. Residual herbicides should not be used.
- » The effectiveness of vegetation control varies seasonally and this is also likely to impact alien species. Control early in the wet season will allow species to re-grow and follow-up control is likely to be required. It is tempting to leave control until late in the wet season to avoid follow-up control. However, this may allow alien species to set seed before control and hence will not contribute towards reducing alien species abundance. Therefore, vegetation control should be aimed at the middle of the wet season, with a follow-up event towards the end of the wet season. There are no exact dates that can be specified here as each season is unique and management must therefore respond according to the state and progression of the vegetation.
- » Alien management is an iterative process and it may require repeated control efforts to significantly reduce the abundance of a species. This is often due to the presence of large and persistent seed banks. However, repeated control usually results in rapid decline once seed banks become depleted.
- » Some alien species are best individually pulled by hand and in the case of *Opuntia* removed from the site.
- » Regular vegetation control to reduce plant biomass within the site should be conducted. This should be timed so as to coincide with the critical growth phases of the most important alien species on site. This will significantly reduce the cost of alien management as this should contribute towards the control of the dominant alien species and additional targeted control will be required only for a limited number of species.
- » No alien species should be cultivated on-site. If vegetation is required for aesthetic purposes, then non-invasive, water-wise locally-occurring species should be used
- » During operation, surveys for alien species should be conducted regularly. It is recommended that this be undertaken every 6 months for the first two years after construction and annually thereafter. All aliens identified should be cleared using appropriate means.

4.5. Monitoring

In order to monitor the impact of clearing activities, follow-ups and rehabilitation efforts, monitoring must be undertaken. This section provides a description of a possible monitoring programme that will provide and assessment of the magnitude of alien invasion on site as well as an assessment of the success of the management programme.

In general, the following principles apply for monitoring:

- » Photographic records must be kept of areas to be cleared prior to work starting and at regular intervals during initial clearing activities. Similarly, photographic records should be kept of the area from immediately before and after follow-up clearing activities. Rehabilitation processes must also be recorded.
- » Simple records must be kept of daily operations, e.g. area/location cleared, labour units and, if ever used, the amount of herbicide used.
- » It is important that, if monitoring results in detection of invasive alien plants, that this leads to immediate action.

The following monitoring should be implemented to ensure management of alien invasive plant species.

Construction Phase

Monitoring Action	Indicator	Timeframe
Document alien species present at the site	List of alien species	Preconstruction & monthly thereafter
Document alien plant distribution	Alien plant distribution map within priority areas	3 Monthly
Document & record alien control measures implemented	Record of clearing activities	3 Monthly
Review & evaluation of control success rate	Decline in documented alien abundance over time	Biannually

Operation Phase

Monitoring Action	Indicator	Timeframe
Document alien species distribution and abundance over time at the site	Alien plant distribution map	Biannually
Document alien plant control measures implemented & success rate achieved	Records of control measures and their success rate. A decline in alien distribution and cover over time at the site	Biannually
Document rehabilitation measures implemented and success achieved in problem areas	Decline in vulnerable bare areas over time	Biannually

**APPENDIX E:
RE-VEGETATION AND
REHABILITATION PLAN**

REVEGETATION AND REHABILITATION PLAN

1. PURPOSE

The purpose of the rehabilitation plan is to ensure that areas cleared or impacted during construction activities of the Lethabo PV Solar Energy Facility are rehabilitated with a plant cover that reduces the risk of erosion from these areas as well as restores some ecosystem function. The purpose of the rehabilitation plan for the site can be summarised as follows:

- » Achieve long-term stabilisation of all disturbed areas to minimise erosion potential.
- » Re-vegetate all disturbed areas with suitable local plant species.
- » Minimise visual impact of disturbed areas.
- » Ensure that disturbed areas are safe for future uses.

This Revegetation and Rehabilitation Plan should be closely aligned with other site-specific plans, including the Erosion Management Plan, Soil Management Plan, Alien Plant Management Plan, and Plant Rescue and Protection Plan. Prior to commencement of construction, a detailed Rehabilitation Plan and Method Statement for the site should be compiled with the aid of a Rehabilitation Specialist.

2. RELEVANT ASPECTS OF THE SITE

The selected property falls within the Central Free State Grassland (GH 6) as defined by Mucina and Rutherford (2006). A total of 1432 plant species have been recorded in the Sasolburg/Vereeniging Area according to the SANBI database. This high number is largely attributable to the many diverse habitats within the grid, but will not all be found within any one habitat type. Only 115 indigenous plant species could be verified on site, with an additional 22 alien invasive species (excluding planted exotic trees).

3. REHABILITATION METHODS

- » Immediately after replacing topsoils in disturbed areas, the soil surface must be revegetated with a suitable plant cover.
- » It is expected that soil seed banks of indigenous vegetation will be present to initiate initial vegetation cover. However, simply applying this topsoil to a well prepared rehabilitation site does not result in the same species richness and diversity as the surrounding areas. In some areas the natural regeneration of the vegetation may be poor and the application relevant of seed to enhance vegetation recovery may be required.

- » Where possible, seed should be collected from plants present at the site during plant rescue operations. Indigenous seeds may also be harvested for purposes of re-vegetation in areas that are free of alien or invasive vegetation, either at the site prior to clearance or from suitable neighbouring sites.
- » Seed collection should be undertaken by a suitably qualified specialist who is familiar with the various seed types associated with the plant species and rehabilitation in the area.
- » Seed collection may be done throughout the year as seed ripens, but can also be restricted to summer, when a large amount of the perennial seed should have ripened. The collection of unripe seeds will reduce the percentage germination thereby reducing the effectiveness of the rehabilitation efforts. Seeds should be stored in paper or canvas bags dusted with insecticide, and sown at the onset of the rainy season.
- » Seed can be sown onto the soil, but should preferably be applied in conjunction with measures to improve seedling survival such as scarification of the soil surface or simultaneous application of mulch. Additional organic material may be added to the soil mix, if required, to assist with water retention during the early stages of seedling establishment.
- » It should be ensured that the seed mix is as diverse as possible in the first season. After the first season, when pioneer plant communities have successfully established, attempts should be made to re-sow and replant the area with more perennial and woody species. It is a process that will require several follow-ups.
- » Planting is dependent on species involved. Planting of species recommended for rehabilitation should be carried out as far as is practicable to coincide with the onset of the first significant rains. In general however, planting should commence as soon as possible after construction is completed in order to minimise the potential for erosion.
- » The final vegetation cover should resemble the original (non-encroached and indigenous) vegetation composition and structure as far as practicably possible.
- » Progressive rehabilitation is an important element of the rehabilitation strategy and should be implemented where feasible. Re-vegetation of disturbed surfaces must occur immediately after construction activities are completed.
- » Once revegetated, areas should be protected to prevent trampling and erosion.
- » No construction equipment, vehicles or unauthorised personnel should be allowed onto areas that have been vegetated.
- » Where rehabilitation sites are located within actively grazed areas, they should be fenced, this must be undertaken in consultation with the landowner.
- » Fencing should be removed once a sound vegetative cover has been achieved.

- » Any runnels, erosion channels or wash ways developing after revegetation should be backfilled and consolidated and the areas restored to a proper stable condition.

4. MONITORING AND FOLLOW-UP ACTION

Throughout the lifecycle of the development, regular monitoring and adaptive management must be in place to detect any new degradation of rehabilitated areas. During the construction phase, the Environmental Officer (EO) and EPC Contractor will be responsible for initiating and maintaining a suitable monitoring system. Once the development is operational, the Proponent will need to identify a suitable entity that will be able to take over and maintain the monitoring cycle and initiate adaptive management as soon as it is required. Monitoring personnel must be adequately trained.

The following are the minimum criteria that should be monitored:

- » Composition and density of replanted vegetation, distinguishing between species introduced for initial revegetation only and species that are part of the pre-determined desirable end state.
- » Associated nature and stability of surface soils
- » Re-emergence of alien and invasive plant species. If noted, remedial action must be taken immediately.

The initial revegetation period post construction is estimated to be over a period of 6 months (minimum) to 12 months (maximum), or a time period specified by the rehabilitation specialist, particularly if planting of trees and shrubs occurs. The rehabilitation phase (including post seeding maintenance) should be at least 12 months (depending on time of seeding and rainfall) to ensure establishment of an acceptable plant cover is achieved (excluding invasive plant species or weeds).

As rehabilitation success, monitoring and follow-up actions are important to achieve the desired cover and soil protection. The following monitoring protocol is recommended:

- » Re-vegetated areas should be monitored every 4 months for the first 12 months following construction.
- » Re-vegetated areas showing inadequate surface coverage (less than 20% within 12 months after re-vegetation) should be prepared and re-vegetated;
- » Any areas showing erosion, should be re-contoured and seeded with indigenous grasses or other locally occurring species which grow quickly.

If the plants have not established and the acceptable plant cover is not achieved within the specified maintenance period, maintenance of these areas shall

continue until an acceptable plant cover is achieved (excluding alien plant species or weeds). Additional seeding or planting may be necessary to achieve acceptable plant cover. Hand seeding may have to be considered as an option in this case.

Monitoring of rehabilitation success and follow-up adaptive management, together with clearing of emerging alien plant species should continue for as long as considered necessary.

**APPENDIX F:
PLANT PROTECTION AND RESCUE
PLAN**

PLANT RESCUE AND PROTECTION PLAN

1. PURPOSE

The purpose of the plant rescue and protection plan is to implement avoidance and mitigation measures, in addition to the mitigations included in the Environmental Management Programme (EMPr) to reduce the impact of the development of the Karusa Wind Energy Facility on listed and protected plant species and their habitats and to provide guidance on search and rescue of species of conservation concern.

2. RELEVANT ASPECTS OF THE SITE

The selected property falls within the Central Free State Grassland (GH 6) as defined by Mucina and Rutherford (2006). A total of 1432 plant species have been recorded in the Sasolburg/Vereeniging Area according to the SANBI database. This high number is largely attributable to the many diverse habitats within the grid, but will not all be found within any one habitat type. Only 115 indigenous plant species could be verified on site, with an additional 22 alien invasive species (excluding planted exotic trees).

The following red data species have been recorded from the area (2827) according to the red data species list of SANBI and the ADU database. *Boophane disticha* was observed in the development site and is protected by the Nature Conservation Ordinance 8 of 1969, Schedule 6: Protected Species. Permits from the relevant authority should be obtained for these species prior to any form of disturbance.

Species	RD Status	Suitable Habitat	Possibility of being present	Threat
<i>Plants</i>				
<i>Trachyandra erythrorrhiza</i>	NT	Black turf marshes	Not expected	Habitat destruction
<i>Stenostelma umbelluliferum</i>	NT	Riparian areas	Not expected	Habitat destruction
<i>Miraglossum laeve</i>	VU	High altitude grasslands	Unlikely	Habitat destruction
<i>Kniphofia typhoides</i>	NT	Wetlands	Unlikely	Habitat destruction
<i>Khadia beswickii</i>	VU	Rocky outcrops	Unlikely	Illegal trade
<i>Hypoxis hemerocallidea</i>	Declining	Variable	Slight	Medicinal Trade
<i>Habenaria barbertoni</i>	NT	Rocky hillsides	Not expected	Habitat destruction

Species	RD Status	Suitable Habitat	Possibility of being present	Threat
<i>Gunnera perpensa</i>	Declining	Wetlands	Unlikely	Habitat destruction
<i>Drimia elata</i>	DDT	Variable habitats	Slight	Medicinal Trade
<i>Crinum bulbispermum</i>	Declining	Grasslands and wetlands	Slight	Habitat destruction
<i>Cineraria austrotransvaalensis</i>	NT	High altitude grasslands	Unlikely	Habitat destruction
<i>Boophone disticha</i>	Declining	Variable habitats	Observed	Medicinal Trade
<i>Acalypha caperonioides</i> var. <i>caperonioides</i>	DDT	Grasslands	Slight	Habitat destruction
<i>Adromischus umbraticola</i> subsp. <i>umbraticola</i>	NT	Rocky outcrops	Unlikely	Habitat destruction
<i>Alepidea attenuata</i>	NT	Highveld wetlands	Unlikely	Habitat destruction
<i>Brachycorythis conica</i> subsp. <i>transvaalensis</i>	EN	Dolomite grasslands	Unlikely	Habitat destruction
<i>Brachystelma incanum</i>	VU	Sandy loam Bushveld	Unlikely	Habitat destruction
<i>Callilepis leptophylla</i>	Declining	Rocky slopes	Unlikely	Medicinal trade
<i>Cineraria longipes</i>	VU	South-facing basalt Koppies	Unlikely	Habitat destruction
<i>Drimia sanguinea</i>	NT	Variable veld	Slight	Medicinal trade
<i>Gnaphalium nelsonii</i>	Rare	Seasonal wetlands	Slight	Habitat destruction
<i>Lepidium mossii</i>	DDD	Grassland	Slight	Habitat destruction
<i>Lessertia mossii</i>	DDT	Variable plains	Unlikely	Habitat destruction
<i>Lithops lesliei</i> subsp. <i>lesliei</i>	NT	Rocky outcrops	Unlikely	Illegal trade
<i>Myrothamnus flabellifolius</i>	DDT	Rocky outcrops	Unlikely	Medicinal trade
<i>Pearsonia bracteata</i>	NT	Plateau grassland	Unlikely	Habitat destruction
<i>Stapelia paniculata</i> subsp. <i>paniculata</i>	NT	Rocky outcrops	Unlikely	Illegal trade
Terrestrial Vertebrates				
Giant Girdled Lizard <i>Smaug (Cordylus) giganteus</i>	VU	Grassland	Slight	Habitat destruction
Giant Bull Frog <i>Pyxicephalus adspersus</i>	NT	Wetlands	Slight	Habitat destruction
Coppery Grass Lizard <i>Chamaesaura aenea</i>	NT	Grasslands	Slight	Habitat destruction

3. PRINCIPLES FOR SEARCH AND RESCUE

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 following principles apply in terms of plant rescue and protection:

- » A permit is required from the Department of Economic Development, Tourism and Environmental Affairs to translocate or destroy any listed and protected species identified by the ecological walkthrough survey undertaken for the optimised final Lethabo PV Facility layout, even if they do not leave the property. This permit should be obtained prior to any search and rescue operations being undertaken.
- » Where suitable species are identified, a search and rescue operation of these species should be undertaken within the development footprint, where these species would be affected, and prior to the commencement of construction.
- » As far as possible, timing of search and rescue activities should be planned with the onset of the growing season.
- » Affected individuals should be translocated to a similar habitat outside of the development footprint and marked and recorded for monitoring purposes. For each individual plant that is rescued, the plant must be photographed before removal, tagged with a unique number or code and a latitude longitude position recorded using a hand-held GPS device.
- » The rescued plants must be planted into a container to be housed within a temporary nursery on site or immediately planted into the target habitat.
- » Rescued plants, if re-planted back in the wild, should be placed as close as possible to where they were originally removed. Re-planting into the wild must cause as little disturbance as possible to existing natural ecosystems. The position of the rescued individual/s must be recorded to aid in future monitoring of that plant as noted earlier.
- » During construction, the Environmental Control Officer (ECO)/ Contractor's Environmental Officer (EO)/ Environmental Representative must monitor vegetation clearing at the site. Any deviations from the plans that may be required should first be checked for listed species by the Environmental Control Officer (ECO)/ Contractor's Environmental Officer (EO/ SHE

Representative) and any listed species present which are able to survive translocation should be translocated to a safe site.

- » Any listed species suitable for translocation observed within the development footprint, and that would be affected, that were not previously observed be translocated to a safe site.
- » The collecting of plants or their parts should be strictly forbidden. Staff should be informed of the legal and conservation aspects of harvesting plants from the wild as part of the environmental induction training.
- » Sensitive habitats and area outside project development should be clearly demarcated as no go areas during the construction and operational phase to avoid accidental impacts.

**APPENDIX G:
TRAFFIC MANAGEMENT PLAN**

PRINCIPLES FOR TRAFFIC TRANSPORTATION MANAGEMENT

1. PURPOSE

The purpose of this Traffic Management Plan (TMP) is to address regulatory compliance, traffic management practices, and protection measures to help reduce impacts related to transportation and the construction of temporary and long-term access within the vicinity of the Lethabo PV Solar Energy Facility project site. The objectives of this plan include the following:

- » To ensure compliance with all legislation regulating traffic and transportation within South Africa (National, Provincial, Local & associated guidelines).
- » To avoid incidents and accidents while vehicles are being driven and while transporting personnel, materials, and equipment to and from the project site.
- » To raise greater safety awareness in each driver and to ensure the compliance of all safe driving provisions for all the vehicles.
- » To raise awareness to ensure drivers respect and follow traffic regulations.
- » To avoid the deterioration of access roads and the pollution that can be created due to noise and emissions produced by equipment, machinery, and vehicles.

2. RELEVANT ASPECTS OF THE PROJECT

Access to the site is provided directly from the R716 that runs parallel to the western boundary of the proposed site. Access/haul roads to the site as well as internal access roads within the site are required to be established. The internal access roads will be up to 6-8 m in width. As far as possible, existing access roads to the site would be utilised, and upgraded where required.

Construction Phase

The following indicative traffic volumes is anticipated for the Lethabo Civil Works:

- Site Establishment:
 - Lowbeds
 - 55 trips
- De Establishment:
 - Lowbeds
 - 55 trips
- Concrete
 - Aggregate 100 loads per week
 - Cement delivery truck 1 per week
 - Fly Ash delivery truck 1 per week

- Reinforcing
 - 10 trucks per month x 10 months

Based on the expected number of construction trips generated by the Lethabo PV Solar Energy Facility development the existing road network has sufficient capacity to accommodate the additional trips from an operational perspective.

Operational Phase

The operational phase of this project is not expected to generate significant traffic volumes. The typical day-to-day activities will probably only be service vehicles undertaking general maintenance at the site therefore no additional upgrades are required to accommodate the operational site traffic.

3. TRAFFIC AND TRANSPORTATION MANAGEMENT PRINCIPLES

- » Prior to the commencement of construction the contractor must develop their own detailed Transport Management Plan (TMP) based on the requirements laid out in this plan.
- » The transport contractor must ensure that all required permits for the transportation of abnormal loads are in place prior to the transportation of equipment and project components to the site. Specific abnormal load routes must be developed with environmental factors taken into consideration.
- » Before construction commences, authorised access routes must be clearly marked in the field with signs or flagging. The Construction Contractor must review the location of designated access and will be responsible for ensuring construction travel is limited to designated routes. The entrance of the main access road must not be constructed before a blind rise or on a bend of the public road.
- » All employees must attend an environmental training program (e.g. toolbox talks) by the Environmental Officer (EO). Through this program, employees will be instructed to use only approved access roads, drive within the delineated road limits, and obey jurisdictional and posted speed limits to minimise potential impacts to the environment and other road users.
- » The contractor will be responsible for making sure that their suppliers, vendors, and subcontractors strictly comply with the principles of this TMP and the contractor's TMP.
- » Adjacent landowners must be notified of the construction schedule.
- » Access roads and entrances to the site should be carefully planned to limit any intrusion on the neighbouring property owners and road users.
- » Signs must be posted in the project area to notify landowners and others of the construction activity.

- » Flagging must be provided at access points to the site and must be maintained until construction is completed on the site.
- » Speed limits must be established prior to commencement of construction and enforced over all construction traffic.
- » Speed controls and implementation of appropriate dust suppression measures must be enforced to minimise dust pollution.
- » Throughout construction the contractor will be responsible for monitoring the condition of roads used by project traffic and for ensuring that roads are maintained in a condition that is comparable to the condition they were in before the construction began.
- » Drivers must have an appropriate valid driver's license and other operation licences required by applicable legislation.
- » All vehicles must be maintained in good mechanical, electrical, and electronic condition, including but not limited to the brake systems, steering, tires, windshield wipers, side mirrors and rear view mirror, safety belts, signal indicators, and lenses.
- » Any traffic delays attributable to construction traffic must be co-ordinated with the appropriate authorities.
- » No deviation from approved transportation routes must be allowed, unless roads are closed for reasons outside the control of the contractor.
- » Impacts on local communities must be minimised. Consideration should be given to limiting construction vehicles travelling on public roadways during the morning and late afternoon commute time.

4. MONITORING

- » The principal contractor must ensure that all vehicles adhere to the speed limits.
- » A speeding register must be kept with details of the offending driver.
- » Repeat offenders must be penalised.
- » Where traffic signs are not being adhered to, engineering structures must be used to ensure speeds are reduced.

**APPENDIX H:
STORM WATER MANAGEMENT PLAN**

STORMWATER MANAGEMENT PLAN

1. PURPOSE

It is widely recognised that developments could impact negatively on drainage systems. By taking greater cognisance of natural hydrological patterns and processes it is possible to develop stormwater management systems in a manner that reduces these potentially negative impacts and mimic nature. The main risks associated with inappropriate stormwater management are increased erosion risk and risks associated with flooding. Therefore, this Stormwater Management Plan and the Erosion Management Plan are closely linked to one another and should be managed together.

This Stormwater Management Plan addresses the management of stormwater runoff from the development site and significant impacts relating to resultant impacts such as soil erosion and downstream sedimentation. The main factors influencing the planning of storm water management measures and infrastructure are:

- » Topography and slope gradients;
- » Placing of infrastructure and infrastructure design;
- » Annual average rainfall;and
- » Rainfall intensities;

The objective of the plan is therefore to provide measures to address runoff from disturbed portions of the site, such that they:

- » do not result in concentrated flows into natural watercourses i.e. provision should be made for temporary or permanent measures that allow for attenuation, control of velocities and capturing of sediment upstream of natural watercourses.
- » do not result in any necessity for concrete or other lining of natural watercourses to protect them from concentrated flows off the development if not necessary.
- » do not divert flows out of their natural flow pathways, thus depriving downstream watercourses of water.

This Storm Water Management Plan must be updated and refined once the construction/civil engineering plans have been finalised following detailed design.

2. RELEVANT ASPECTS OF THE SITE

The study site falls within the quaternary catchment C22F. In this catchment the mean annual precipitation is lower than the potential evapotranspiration and as such any wetlands in this catchment would rely largely on regional hydrology for their source of water (water supplied by rainfall is unlikely to be enough to support these wetlands). Two wetlands were delineated on the study site, both being hillslope seeps. These

wetlands are sensitive to any changes in the volume and duration of the water supplied by regional hydrology.

Large areas of the eastern wetland were covered in gravel and rubble. This wetland had also been drained with a herring-bone drain system. The dominant vegetation was invasive alien species. The Present Ecological State scores (PES) score for this wetland is a D↓, a large change in ecosystem processes and loss of natural habitat and biota has occurred. The northern wetland was largely natural with the upper (southern) parts of the seep being completely unmodified with the lower reaches being impacted on by old roads, a railway and demolished buildings. The PES score for this wetland is an A near natural conditions.

A combined EIS score of 1.6 was calculated for both the seep wetlands, placing them in the MODERATE importance and sensitivity category. Wetlands in this category are considered to be ecologically important and sensitive on a provincial or local scale (DWAF, 1999).

3. STORMWATER MANAGEMENT PRINCIPLES

In the design phase, various stormwater management principles should be considered including:

- » Prevent concentration of stormwater flow at any point where the ground is susceptible to erosion.
- » Reduce stormwater flows as far as possible by the effective use of attenuating devices (such as swales, berms, silt fences). As construction progresses, the stormwater control measures are to be monitored and adjusted to ensure complete erosion and pollution control at all times.
- » Minimise the area of exposure of bare soils to minimise the erosive forces of wind, water and all forms of traffic.
- » Ensure that development does not increase the rate of stormwater flow above that which the natural ground can safely accommodate at any point in the sub-catchments.
- » Ensure that all stormwater control works are constructed in a safe and aesthetic manner in keeping with the overall development.
- » Plan and construct stormwater management systems to remove contaminants before they pollute surface waters or groundwater resources.
- » Contain soil erosion, whether induced by wind or water forces, by constructing protective works to trap sediment at appropriate locations. This applies particularly during construction.
- » Avoid situations where natural or artificial slopes may become saturated and unstable, both during and after the construction process.
- » Design and construct roads to avoid concentration of flow along and off the road. Where flow concentration is unavoidable, measures to incorporate the road into the

pre-development stormwater flow should not exceed the capacity of the culvert. To assist with the stormwater run-off, gravel roads should typically be graded and shaped with a 2-3% crossfall back into the slope, allowing stormwater to be channelled in a controlled manor towards the, natural drainage lines and to assist with any sheet flow on the site.

- » Design culvert inlet structures to ensure that the capacity of the culvert does not exceed the pre-development stormwater flow at that point. Provide detention storage on the road and/or upstream of the stormwater culvert.
- » Design outlet culvert structures to dissipate flow energy. Any unlined downstream channel must be adequately protected against soil erosion.
- » Where the construction of a building causes a change in the vegetative cover of the site that might result in soil erosion, the risk of soil erosion by stormwater must be minimised by the provision of appropriate artificial soil stabilisation mechanisms or re-vegetation of the area. Any inlet to a piped system should be fitted with a screen, or grating to prevent debris and refuse from entering the stormwater system.
- » Preferably all drainage channels on site and contained within the larger area of the property (i.e. including buffer zone) should remain in the natural state so that the existing hydrology is not disturbed.

3.1. Engineering Specifications

A detailed engineering specifications Stormwater Management Plan describing and illustrating the proposed stormwater control measures must be prepared by the Civil Engineers during the detailed design phase and should be based on the underlying principles of this Storm-water Management Plan. This should include erosion control measures. Requirements for project design include:

- » Erosion control measures to be implemented before and during the construction period, including the final stormwater control measures (post construction).
- » All temporary and permanent water management structures or stabilisation methods must be indicated within the Final/Updated Stormwater Management Plan.
- » The drainage system for the site should be designed to specifications that can adequately deal with a 1:50 year intensity rainfall event or more to ensure sufficient capacity for carrying storm waters around and away from infrastructure.
- » Procedures for storm water flow through a project site need to take into consideration both normal operating practice and special circumstances. Special circumstances in this case typically include severe rainfall events.
- » An onsite Engineer or Environmental Officer to be responsible for ensuring implementation of the erosion control measures on site during the construction period.
- » The EPC Contractor 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.

During the construction phase, the contractor must prepare a Stormwater Control Method Statement to ensure that all construction methods adopted on site do not cause, or precipitate soil erosion and shall take adequate steps to ensure that the requirements of the Stormwater Management Plan are met before, during and after construction. The designated responsible person on site, must be indicated in the Stormwater Control Method Statement and shall ensure that no construction work takes place before the relevant stormwater control measures are in place.

An operational phase Stormwater Management Plan should be designed and implemented if not already addressed by the mitigations implemented as part of construction, with a view to preventing the passage of concentrated flows off hardened surfaces and onto natural areas.

**APPENDIX I:
EROSION MANAGEMENT PLAN**

PRINCIPLES FOR EROSION MANAGEMENT

1. PURPOSE

Exposed and unprotected soils are the main cause of erosion in most situations. Therefore, this erosion management plan and the revegetation and rehabilitation plan are closely linked to one another and should not operate independently, but should rather be seen as complementary activities within the broader environmental management of the site and should therefore be managed together.

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

- A general framework for soil erosion and sediment control, which enables the contractor to identify areas where erosion can occur and is likely to be accelerated by construction related activities.
- An outline of general methods to monitor, manage and rehabilitate erosion prone areas, ensuring that all erosion resulting from all phases of the development is addressed.

2. RELEVANT ASPECTS OF THE SITE

The soils occurring in the study area are sandy in nature. Due to the sandy nature of the topsoil across much of the area, wind erosion is a definite possibility if the surface vegetation is removed.

3. EROSION AND SEDIMENT CONTROL PRINCIPLES

The goals of erosion control during and after construction at the site should be to:

- » Protect the land surface from erosion;
- » Intercept and safely direct run-off water from undisturbed upslope areas through the site without allowing it to cause erosion within the site or become contaminated with sediment; and
- » Progressively revegetate or stabilise disturbed areas.

These goals can be achieved by applying the management practices outlined in the following sections.

3.1. On-Site Erosion Management

General factors to consider regarding erosion risk at the site includes the following:

- » Due to the sandy nature of Soils in the study area, soil loss will be greater during dry periods as it is more prone to wind erosion. Therefore precautions to prevent erosion should be present throughout the year.
- Soils loss will be greater on steeper slopes. Ensure that steep slopes are not de-vegetated unnecessarily and subsequently become hydrophobic (i.e. have increased runoff and a decreased infiltration rate) increasing the erosion potential.
- » Soil loss is related to the length of time that soils are exposed prior to rehabilitation or stabilisation. Therefore the gap between construction activities and rehabilitation should be minimised. Phased construction and progressive rehabilitation, where practically possible, are therefore important elements of the erosion control strategy.
- » The extent of disturbance will influence the risk and consequences of erosion. Therefore site clearing should be restricted to areas required for construction purposes only. As far as possible, large areas should not be cleared all at once, especially in areas where the risk of erosion is higher.
- » Roads should be planned and constructed in a manner which minimises their erosion potential. Roads should therefore follow the natural contour as far as possible. Roads parallel to the slope direction should be avoided as far as possible.
- » Where necessary, new roads constructed should include water diversion structures present with energy dissipation features present to slow and disperse the water into the receiving area.
- » Roads and other disturbed areas should be regularly monitored for erosion. Any erosion problems recorded should be rectified as soon as possible and monitored thereafter to ensure that they do not re-occur.
- » Compacted areas should have adequate drainage systems to avoid pooling and surface flow. Heavy machinery should not compact those areas which are not intended to be compacted 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.
- » All bare areas should be revegetated with appropriate locally occurring species, to bind the soil and limit erosion potential.
- » Silt fences should be used where there is a danger of topsoil or material stockpiles eroding and entering streams and other sensitive areas.
- » Gabions and other stabilisation features should be used on steep slopes and other areas vulnerable to erosion to minimise erosion risk as far as possible.
- » Activity at the site after large rainfall events when the soils are wet and erosion risk is increased should be reduced.

- » Topsoil should be removed and stored in a designated area separately from subsoil and away from construction activities (as per the recommendations in the EMPr). Topsoil should be reapplied where appropriate as soon as possible in order to encourage and facilitate rapid regeneration of the natural vegetation in cleared areas.
- » Regular monitoring of the site for erosion problems during construction (ongoing) and operation (at least twice annually) is recommended, particularly after large summer thunderstorms have been experienced. The ECO will determine the frequency of monitoring based on the severity of the impacts in the erosion prone areas.

3.1.1. Erosion control mechanisms

The contractor may use the following mechanisms (whichever proves more appropriate/ effective) to combat erosion when necessary:

- Reno mattresses;
- Slope attenuation;
- Hessian material;
- Shade catch nets;
- Gabion baskets;
- Silt fences;
- Storm water channels and catch pits;
- Soil bindings;
- Geofabrics;
- Hydro-seeding and/or re-vegetating;
- Mulching over cleared areas;
- Boulders and size varied rocks; and
- Tilling.

3.2. Engineering Specifications

A detailed engineering specifications Storm-water Management Plan describing and illustrating the proposed stormwater control measures must be prepared by the Civil Engineers during the detailed design phase and should be based on the underlying principles of the Storm-water Management Plan (Appendix H of the EMPr) and this should include erosion control measures. Requirements for project design include:

- Erosion control measures to be implemented before and during the construction period, including the final stormwater control measures (post construction).
- All temporary and permanent water management structures or stabilisation methods must be indicated within the Stormwater Management Plan.

- An onsite Engineer or Environmental Officer (EO)/ SHE Representative to be responsible for ensuring implementation of the erosion control measures on site during the construction period. The ECO to monitor the effectiveness of these measures on the interval agreed upon with the Site Manager and EO.
- The EPC Contractor holds ultimate responsibility for remedial action in the event that the approved Storm-Water Plan is not correctly or appropriately implemented and damage to the environment is caused.

3.3. Monitoring

The site must be monitored continuously during construction and operation in order to determine any indications of erosion. If any erosion features are recorded as a result of the activities on site the Environmental Officer (EO)/ SHE Representative (during construction) or Environmental Manager (during operation) must:

- » Assess the significance of the situation.
- » Take photographs of the soil degradation.
- » Determine the cause of the soil erosion.
- » Inform the contractor/operator that rehabilitation must take place and that the contractor/operator is to implement a rehabilitation method statement and management plan to be approved by the Site/Environmental Manager in conjunction with the ECO.
- » Monitor that the contractor/operator is taking action to stop the erosion and assist them where needed.
- » Report and monitor the progress of the rehabilitation weekly and record all the findings in a site register (during construction).
- » All actions with regards to the incidents must be reported on a monthly compliance report which should be kept on file for if/when the Competent Authority requests to see it (during construction) and kept on file for consideration during the annual audits (during construction and operation).

The Contractor (in consultation with an appropriate specialist, e.g. an engineer) must:

- » Select a system/mechanism to treat the erosion.
- » Design and implement the appropriate system/mechanism
- » Monitor the area to ensure that the system functions like it should. If the system fails, the method must be adapted or adjusted to ensure the accelerated erosion is controlled.
- » Continue monitoring until the area has been stabilised.
- »

4. CONCLUSION

The Erosion Management Plan is a document to assist the Proponent/ EPC Contractor with guidelines on how to manage erosion during all phases of the project. The implementation of management measures is not only good practice to ensure minimisation of degradation, but also necessary to ensure compliance with legislative requirements. This document forms part of the EMPr, and is required to be considered and adhered to during the design, construction, operation and decommissioning phases of the project (if and where applicable).

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**APPENDIX J:
LETHABO POWER STATION
EMERGENCY RESPONSE PLAN**



MANUAL

Lethabo
Power Station

Title: **Emergency Preparedness Station** Unique Identifier: **240-65693374**
Response Plan

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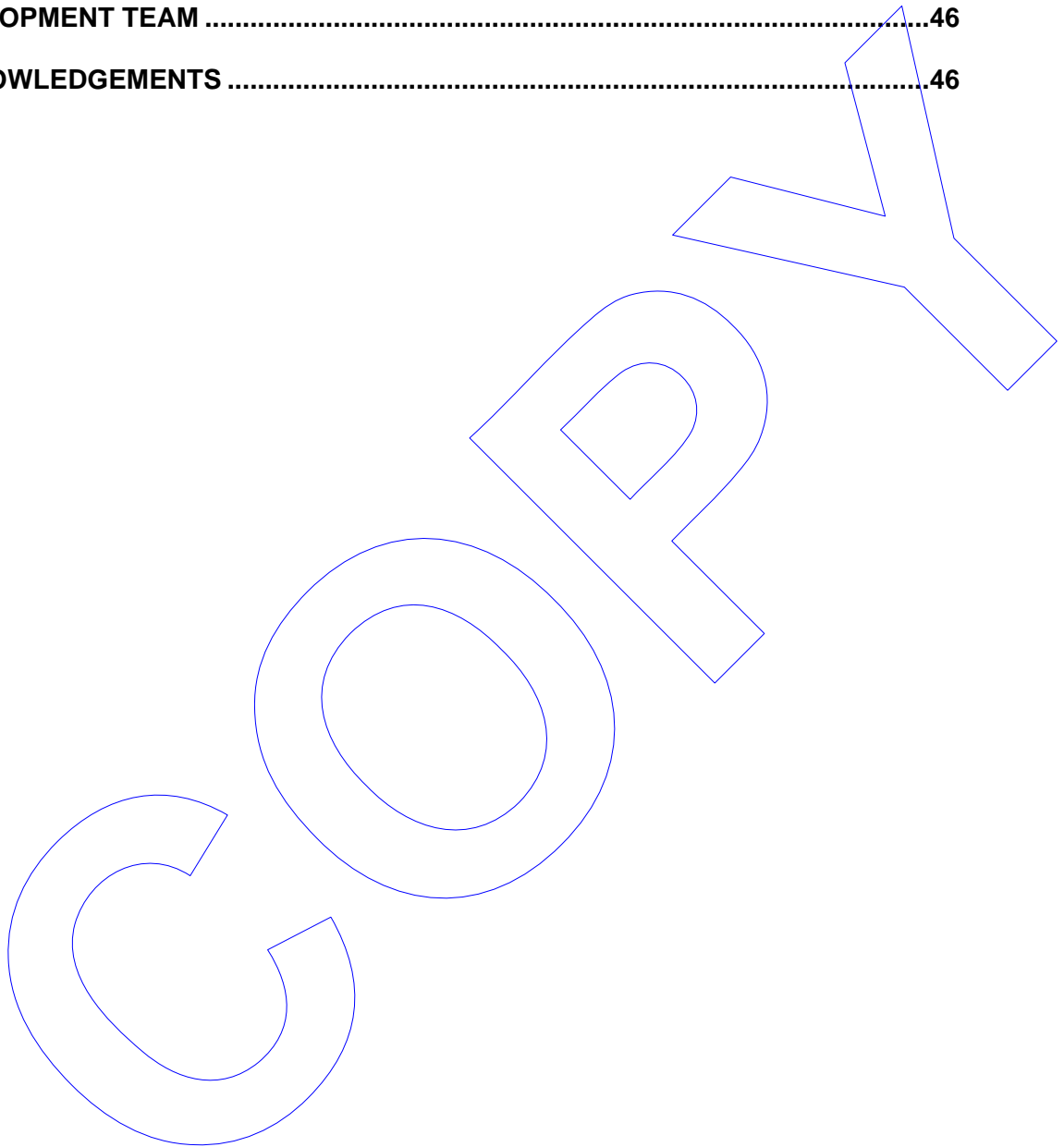
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1. INTRODUCTION

An emergency situation at the station may occur suddenly and without warning. Proper planning for emergencies is necessary to minimize the impact on station operations. This plan manual is designed to prepare the station to properly handle emergency situations that may occur on site.

The plan manual also refers to procedures for notifying appropriate personnel, defines responsibilities and provides guidelines for handling emergencies. While this plan manual does not cover every possible situation, it supplies the basic information necessary to cope with most station emergencies.

The ISO 14001 standard for an Environmental Management System (EMS) requires that an organisation shall establish, implement and maintain procedures to identify potential emergency situations and potential accidents that can have an impact on the environment and how it will respond to them.

The organisation shall respond to the actual emergency situations and accidents and prevent or mitigate associated adverse environmental impacts. The potential for emergencies exist at Lethabo Power Station due to the type of activities that happen on site. Various chemicals are used at Lethabo Power Station .Many of these are hazardous in nature due to its corrosive, toxic, irritant, strongly sensitising or flammable nature. Some of these are stored in bulk quantities locally on site .Thus the potential for spillage is a real one that requires emergency plans to be in place depending on the magnitude of the spillages. This procedure is to be used in conjunction with the Engineering departments chemical spills procedure.

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2. SUPPORTING CLAUSES

2.1 SCOPE

2.1.1 Purpose

The purpose of the Emergency Risk Preparedness Response Plan manual is to:

- Provide a management plan which addresses preparedness, response, notification and recovery from an emergency.
- Provide a plan to protect lives, safety, and health of Lethabo personnel, contractors and visitors.
- Provide a plan to protect the station facilities, properties and equipment from loss as a result of an emergency incident.
- Provide for the restoration of station facilities, functions and services after an emergency.
- Ensure that the environmental effects are addressed timeously.

This procedure covers emergency preparedness at Lethabo Power Station which includes chemical spillages on a small and emergency scale. The procedure applies to all Lethabo Power Station and staff and contractors working on behalf of this power station.

2.1.2 Applicability

This document manual shall apply throughout Lethabo Power Station, its employees, contractors and suppliers wherein Eskom, Lethabo Power Station has a controlling interest.

This plan will address the following types of emergencies that might occur inside the perimeter fence of Lethabo:

- Bomb threats & explosions
- Fires
- Chemical releases
- Blood spills
- Asbestos releases
- Natural emergencies
- Medical emergencies
- Utility failures
- Biological

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2.2 NORMATIVE/INFORMATIVE REFERENCES

2.2.1 Normative

- 32-84, Eskom Security Risk Management Policy
- 32-86, Integrated Risk Management Policy
- 32-94, Safety, Health and Environment (SHE) Policy
- 32-108 Fire fighting organisation
- 32-123: Emergency Planning
- 32-124: Eskom Fire Risk Management
- 36-371 Management of Emergency Preparedness in Gx
- National Key Point Act 102 of 1980 as amended
- Occupational Health and Safety Act
- National Water Act 36 of 1998
- National Environmental Management Act 107 of 1998
- The Disaster Management Act (Act 52 of 2002)

2.2.2 Informative

- Emergency Preparedness Policy – LBPS 019
- Emergency Preparedness Evacuation Procedure – LBA 00036
- Emergency Crisis Communication Plan – LBA 00141
- Waste management procedure –LBE 22004PC
- Environmental non-conformance investigation and reporting

2.3 DEFINITIONS

2.3.1 Classification

- a) Controlled disclosure: controlled disclosure to external parties (either enforced by law, or discretionary).

Definition	Explanation
Assembly Point	shall mean pre-determined and sufficiently identified assembly points where personnel gather after evacuation under the control of the evacuation officer
Area Controller	shall mean a person appointed to co-ordinate the actions of emergency personnel i.e. Fire; First Aid; Security; etc in a designated area of his/her responsibility, and to liaise with the EP CENTRE
Chemical	–refers to all substances usually of a hazardous nature including liquid, solid or gaseous examples include sulphur, sulphuric acid, fluorescent tubes, chlorine gas etc.

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Definition	Explanation
Environment	–is the surrounding in which human exist and that are made up of : <ul style="list-style-type: none"> • The land water and atmosphere of the earth • Microorganisms, plant and animal life • Any part or combination of the above two and the relationship between them • The physical, chemical, aesthetic and cultural properties and conditions of all of the above that influence human health and well-being.
Emergency Planning	Shall mean the planning of all actions and activities to contain and reduce the consequences of emergency situations detrimental to Lethabo business.
Emergency Situations	Shall mean an unplanned and uncontrolled event that might threaten or negatively influence human life; assets and the continuous rendering of strategic and essential services.
Emergency Risk Preparedness (EP)	Shall mean to be prepared to contain or reduce the consequences of emergency risk situations affecting our business.
Emergency Operational Centre (EP CENTRE)	Shall mean a centre specifically equipped to cater to planning, co-ordinate, directing and applying effective control during emergency risk operations.
Emergency Exercise	Shall mean the control of an emergency situation with the purpose of testing response and recovery actions of a given segment by means of a simulated or paper exercise.
Exercise Controller	Shall mean the person charged with the responsibility to control the planning, execution and evaluation of an exercise.
EP Program Evaluation	Shall mean assessing the applicability of the emergency risk planning program at the power station, by comparing the existing program elements against the list of elements in emergency planning.
Evacuation Officer	shall mean a person appointed to oversee the orderly evacuation of personnel in a designated area of his/her duty
Life Saver ID	shall mean a jacket worn by the evacuation officer (Yellow) and area controller (Orange) for identification during emergencies
Major chemical spills	A spillage that is large enough to be classified as an emergency situation requiring help from the emergency response personnel or consultants in order to deal with the situation
Material Safety Data Sheet	Detailed information sheets supplied by the manufactures of all materials and substances in terms of the Hazardous Substances Act No.15 of 1973.

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Definition	Explanation
Recovery Plan	Shall mean describing actions required by the EP team to recover from an emergency situation aimed at the reduction of the consequences and to bring the situation back to normal in the shortest and most cost effective way.
Stand Down	shall mean when the Emergency Co-ordinator on instruction of the Head of EP, informs the area controller verbally or by means of tone alarm system that the emergency situation that was prevailing, has ended and it is safe to return to the normal working areas.

2.4 ABBREVIATIONS

Abbreviation	Description
CAPCO	Chief Air Pollution Control Officer
ECAS	Eskom Catering Services
EMS	Environmental Management System
EP	Emergency Preparedness
HOD	Head of Department
JPC	Joint Planning Committee
OHS Act	Occupational Health and Safety Act
PA System	Public Address System
PSM	Power Station Manager
PPE	Personal Protective Equipment
S	Sustainability
SAPS	South African Police Services
SPC	Strategic Planning Committee
NKP	National key point
JOC	Joint Planning Committee
EPC	Emergency Preparedness Co-ordinator
MSDS	Material safety data sheet
BU	Business unit
Dept	Department
RPO	Radiation Officer
MMS	Maintenance management section
IR	Integrated risk
HR	Human resource
NKP	National key point
NIA	National Intelligence Agency
TV	Television
PC	Portable computer
SANDF	South African National Defence force
ID	Internal audit
MC	Medical centre
SRM	Safety risk management

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Abbreviation	Description
ORHVS	Operating Regulation High Voltage
SGM(PU2)	Senior general manager
DE(Gen)	Director executive
MD(Gen)	Manager director
GM(CNP)	General manager
MWP	Megawatt Park
CPR	Cardiopulmonary resuscitation
PCB	Polychlorinated biphenyls
INO	Initial notification occurrence
SAP	Systems, Applications, Products
EAP	Employee assistance program

2.5 ROLES AND RESPONSIBILITIES

2.5.1 Responsibilities during Non-Emergency Situation

- **Power Station Manager - Head of Emergency Preparedness.**
 - Ensure the availability of effective overall co-ordinated plans for the continued operation of Lethabo and swift return to normal following an emergency.
 - Operates a system to ensure that availability of effective plans to obtain assistance from all Lethabo departments and/or contractors.
 - Operates a system to ensure that Lethabo staff is competent to deal with emergency situations.
 - Has regular studies carried out regarding all aspects which could have an influence on the normal activities of the Lethabo. This will be done by liaison with external organisations and other BU's as applicable.
 - Operates a system, which ensures that management teams are familiar with plans and that the responsibilities of the individual members regarding Emergency Preparedness are incorporated in their job output models.
 - Operates a system, which ensures that all staff to serve on Emergency Preparedness teams is appointed.
 - Ensures the availability of an effective EP plan.
 - Approves programme for Emergency Preparedness exercises.

- **Chairperson of Joint Planning Committee (JPC)**
 - Plan, conduct and chair JPC meetings as per NKP requirement
 - Assist with the compilation of scenarios for EP exercises
 - Evaluate emergency plans
 - Support training courses of action with members of JOC
 - Keeps the Head of Emergency Preparedness informed.

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- **Maintenance Manager (Essential Services)**
 - Ensures availability of competent back-up staff and the existence of an effective emergency maintenance and essential services plan to cope with emergency situations.
 - Ensures that all subordinates and contractors are trained and competent to deal with emergency situations.
 - Ensures regular studies of all aspects, which could have an influence on the normal activities on his department.

- **Safety Risk Management (Fire and First Aid support)**
 - Ensures the availability of effective contingency plans with regard to fire fighting and rescue.
 - Ensures that effective plans exist for emergency situations and ensures subordinates are familiar with plans.
 - Ensures the availability of an adequate number of competent fire and rescue teams and equipment.
 - Liaises with Occupational Health Nurse to ensure the availability of an adequate number of first aid staff and an adequate medical backup service.
 - Ensures availability of competent backup personnel.
 - Assumes control of the administrative function as Log Clerk in Emergency Preparedness Centre.
 - Ensures effective record keeping.

- **Emergency Preparedness Co-ordinator (R&A Manager)**
 - Ensures that effective induction training exists for Emergency Preparedness.
 - Ensures that an effective EPC is maintained that all communication systems and other equipment are functional by regular testing thereof.
 - Ensures that all EPC area maps, personnel contact lists and communications networks are checked and updated as necessary.
 - Ensures that adequately trained personnel are available to man the EPC during an emergency.
 - Ensures that there is an effective evacuation organisation with sufficient properly trained members who can take effective action during emergencies.
 - Ensures that Evacuation Officers and Area Controllers are trained and kept in a state of preparedness.
 - Ensure that Evacuation Officers and Area Controllers are clearly identified.
 - Ensures that at least two alternative evacuation routes exist for each area.

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- Liaises regularly with the Evacuation Officers to ensure that the evacuation programme is monitored and maintained.
- Assists the Department Heads in developing, formulating, co-ordinating and implementing the departmental EP input to the Lethabo Power Station EP programme as well as the contingency plans.
- Prepare an EP programme of Lethabo Power Station.
- Checks that all EPC facilities are operational.
- On instruction of the Head of EP announces resumption of normal duties.
- **Environmental (Environmentalist)**
 - To inform or advise on the emergency situation.
 - Communicates environmental aspect of incident as per station procedures
 - Ensure appropriate rehabilitation action, where necessary.
 - Assess impact of incidents and there affects or potential effect of incident on third parties
 - If clean-up cannot be done internally, advise on the appropriate external clean-up company The Environmental Officer will provide support to confirm the magnitude of the emergency from an environmental perspective with the following responsibilities:
 - Serve as a liaison agency to the Emergency Preparedness Centre on environmental issues during the emergency incident
 - Assess chemical, radiological, biological, oil, sulphur and asbestos releases and assist in the co-ordination of appropriate containment and clean-up actions to be taken.
 - Assist with the provision of the necessary emergency supplies and equipment to handle hazardous material spills
 - Provide chemical information and MSDSs as requested
 - Document all environmental related issues and submit required reports to regulatory offices
 - Provide appropriate training to personnel on issues of hazardous spills
 - Conduct an annual appreciation of the facility to ensure compliance with the Emergency Response Plan
- **Fire Service (Fire Officer)**
 - Ensures the availability of effective plans with regard to fire fighting and rescue.
 - Ensures that team members are familiar with plans.
 - Ensures the availability of effective plans to obtain external assistance as may be necessary.
 - Ensures regular studies of all aspects which could have an influence on normal activities of his section by liaison with external organisations and other Eskom departments and BU's

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- Ensures that the adequate equipment and back-up support exists and kept in state of use.
- Assumes the role of co-ordinating fir fighting and rescue
- **Engineering Manager (Engineering Services)**
 - Ensures availability of engineering staff to provide professional advice and formulates plans to safeguard plant integrity and environment.
 - Ensure the presence of competent environmental personnel to assess the environmental impacts / potential impacts of the emergency situation.
 - Ensures availability of effective plans to maintain the continued production of suitable quantities of water and make certain that subordinate staff is familiar with it.
 - Ensures that chemistry-operating staff is competent to handle emergency situations.
 - Ensures availability of competent back-up personnel.
 - Ensures regular studies of all aspects, which could have an influence on the normal activities of the Engineering department by liaison with external organisations and other Eskom departments and Units/BU's.
 - Ensures availability of drawings, documentation, computers, operating and maintenance manuals and procedures if required
 - Co-ordinates the chemistry operating function.
 - Deputises as head of operational side of EPC
- **Logistic Support (Finance & Services Manager)**
 - Ensures the existence of effective discipline plans for all disciplines under his control
 - Ensures that an effective "Transport and Stores" function exists for implementation during emergencies.
 - Ensures regular studies of all aspects which could have an influence on normal activities of all departments by liaison with external organisations and other Eskom departments and BU's
- **Medical Services (Head of Medical Services)**
 - Ensures that the Medical Centre is kept in a state of preparedness and manned during normal working hours.
 - Ensures that there is an alternative Medical Centre
 - Ensures that there are enough first aid teams to cope with all casualties during an emergency.
 - Ensures that the first aiders are kept in a state of preparedness by means of regular training.
 - Ensures availability of effective discipline plans for Medical Services.
 - Ensures availability of competent first-aid personnel

CONTROLLED DISCLOSURE

- Ensures regular studies of all aspects which could have an influence on the normal activities of the section by liaison with external organisations and other Eskom department and BU's
- **Operating Services (Ops Manager)**
 - Ensures the availability of effective plans to maintain the continued operation of plant.
 - Ensures that operating staff are competent to handle emergency situations.
 - Ensures regular studies of all aspects, which could have an influence on the normal activities of the Operations Department by liaison with external organisations and other Eskom departments and BU's.
 - Liaises with National Control
- **Production Coordination (Production Manager)**
 - Ensures the availability of effective plans to restore or monitor the continued production of electricity.
 - Co-ordinates resources in production to put plans into work
 - Communicates plant related conditions and/or requirements for liaison with National Control
 - Assists in EPC if production area is unaffected
 - Co-ordinates resources in production

2.5.2 Responsibilities during Emergency situation

All management; staff; contractors on site and visitors shall follow the guidelines of this plan during an emergency.

- **EP Coordinator**

During any emergency on site, the EP Coordinator will be responsible for the overall emergency coordination with the following responsibilities:

- Assess the extent of the emergency and its consequences on personnel; plant and environment
- Declare the emergency and ensure that members of the EP CENTRE has been notified
- Direct and control the emergency response effort on site to resolve the emergency
- If required, initiate an evacuation
- Ensure that appropriate site emergency personnel and fire and medical services had been called
- Co-ordinate with the PSM office as and when required
- Establish a communication network

CONTROLLED DISCLOSURE

- Ensure that periodic drills and exercises are conducted regularly
- Provide security for evacuated and emergency incident area
- Ensure that the incident has been properly documented and photos taken of the scene
- Ensure that assembly areas had been identified and clearly demarcated for identification by evacuees
- Ensure the availability of stock of barricade materials and emergency signs
- Ensure that the necessary emergency recovery plans and efforts are successful to the fullest extent possible
- **Head of Emergency Risk Preparedness (Lethabo- Power Station Manager)**
 - Approve all policies related to the Emergency Preparedness organisation
 - Approve operational procedures that support the Emergency Response Plan
 - Work with members in the EP CENTRE through the Emergency Co-ordinator to stay informed of decisions and actions taken
 - Propose adjustments during the emergency incident
 - Manage crises communication process in the event of emergency
 - Ensure that the necessary communication with Eskom Holdings has been executed
 - Approve the information to be given to station staff concerning the emergency incident
- **Area Controllers**
 - Proceed to scene of incident to evaluate potential hazards and the need of emergency personnel
 - Evacuate area or building if necessary to protect the health and safety of occupants
 - Ensure that all occupants have evacuated
 - The Area Controller appointed to a designated area will, in the event of an emergency situation, be responsible for co-ordinating actions between Fire, First Aid, Security and Essential Services and relay instructions and requests both ways between these emergency teams and the Key Communicator at the Emergency Preparedness Centre.
 - The area controller is the gateway to the emergency area. All persons shall report to him, and only his instructions shall be followed/executed:
 - ◆ Oversee the evacuation of staff from the affected area
 - ◆ Establish radio communication link with the Emergency Preparedness Centre (EP CENTRE)
 - ◆ Enforce access control to the hazard area

CONTROLLED DISCLOSURE

- ◆ Request traffic control
- ◆ Arrange security for the incident area
- ◆ Arrange for any photo's to be taken
- ◆ Arrange for security at the assembly points
- ◆ Barricade and display the necessary emergency signs

- **Joint Operational Committee (JOC) Members**

The members of the JOC will be responsible for the following corrective actions necessary to restore the emergency incident:

- Amongst them they provide technical support
- Furnish manpower to assist with the emergency
- Provide equipment, supplies and staff
- Supply contact telephone numbers for resources which maybe required during the emergency
- Obtain assistance from New Vaal Mine as required for emergency situations
- Provide emergency lighting if needed
- Provide for debris removal
- Evaluate the impact of the emergency on the production of the station and take appropriate actions
- Determine structural safety of buildings
- Provide necessary vehicles and operators to support emergency
- Ensure that recovery plans are implemented
- Execute their tasks on matrix basis

- **Lethabo Fire Officer**

The Fire Officer has the following duties:

- Respond to an emergency involving fire, hazardous material or natural disaster
- Has overall authority for fire and combustible matter at the scene
- Ensure proper PPE to workers during emergency
- Attempt to resolve emergency by using available resources
- Ensure adequate fire and rescue personnel has been called out
- Ensure that the appropriated hazardous material teams have been called
- Ensure a reliable fire alarm system
- Reset all fire alarms and allow for re-entry into buildings when the situation is determined to be safe
- Replace used fire extinguishers
- Arrange for fire watch in areas unprotected by fire alarms or fire protection systems
- Post the necessary safety signs during emergency

CONTROLLED DISCLOSURE

- **Evacuation Officers**

The evacuation officers shall be responsible for:

- Determine, assess and demarcate assembly area
- Direct and co-ordinate evacuation of personnel
- Determine the approximate number of staff if transport has to be provided in the form of buses
- Ensure that all staff are aware of fire drills and safety measures
- Ensure that an evacuation plan for their building exists and is displayed for observation purposes by staff
- Ensure that routine evacuation drills are conducted and the results sent to the Emergency Preparedness Chairman.

- **Head of Medical Services**

The head of medical services has the following duties:

- Provide emergency medical services
- Respond to emergency incident immediately
- Ensure that medical staff is properly trained
- Provide medical care and ambulance transport for injured personnel
- Provide emergency medical care at the Emergency Preparedness Centre
- Provide a member at the Emergency Preparedness Centre

- **Telephonist**

The Telephonist will:

- Provide telephone switch board facilities at the Emergency Preparedness Centre
- Operate the fax emergency call system
- Set up a telephone log to handle enquiries from spouses; family; etc
- Compile and distribute Emergency Telephone List for call-out purposes
- Ensure that the Notification/Call-Out List be reviewed and updated quarterly.

- **Security**

Protective Services will:

- Ensure proper access control at entrance to Emergency Preparedness Centre
- Assist with the shuttle buses during the evacuation of the site

CONTROLLED DISCLOSURE

- Ensure access control at main gate at all times
- **Staff**
 - Become familiar with emergency response procedures
 - Know the building evacuation routes and assembly points
 - Learn how to operate a fire extinguisher
 - Immediately evacuate the building when the emergency alarm goes off or when requested by any emergency staff member
 - Fully co-operate with the evacuation officer and area controller
- **Key Communicator**

Key Communicator has the following duties:

 - Maintain an internal radio communication network in the EP Centre
 - Maintain an external radio communication network in the EP Centre
 - Maintain telephone and fax facilities in the EP Centre, including a telephone directory.

2.6 PROCESS FOR MONITORING

- None

2.7 RELATED/SUPPORTING DOCUMENTS

- None

3. DOCUMENT CONTENT

3.1 Emergency Preparedness Organisation

3.1.1 Emergency and Disaster Management Structure

The Joint Planning Committee (JPC) shall consist of:

- Joint Planning Committee (JPC) chairman
- Head of Emergency Preparedness (Power Station Manager)
- JOC Members (All Departmental Managers)
- Production Managers
- Representatives from:
 - SAPS
 - NKP Representative (Dept of Safety & Security)
 - NIA
 - Eskom Holdings, Corporate Risk Services Representative

CONTROLLED DISCLOSURE

The Emergency Preparedness Centre (EP CENTRE) members shall consist of:

- Emergency Preparedness Co-ordinator
- Joint Operational Committee members
- Key Communicator including 4 communicator assistants
- Emergency Rescue Team members (Fire fighters and 1st aiders)
- Log Clerk
- Scribe
- Telephonist
- Protective Services
- Medical Services
- Catering Services Staff

3.2 Emergency Preparedness Centre

- Maintain a fully equipped Emergency Preparedness Centre (EP CENTRE), with planning; communication and medical facilities
- Equip the EP CENTRE with aerial photos; maps; furniture; emergency medical equipment; radio's; grid references for helicopter landing pad; stationary and basic emergency equipment such as torches; candles; gas bottles; telephone directories; etc.
- Ensure the room is equipped with a standby generation facility in the case of power failures

3.3 Emergency Preparedness Support Structure

- Maintenance to supply and maintain a resource tools register in the EP CENTRE of all emergency equipment available on site
- Engineering to supply and maintain a resource tools register in the EP CENTRE of all emergency equipment available from New Vaal Mine
- Medical Centre to supply and maintain a resource list register in the EP CENTRE of all emergency services available in the Vaal Triangle
- Fire Section to supply and maintain a resources list register in the EP CENTRE of all available Fire machines in the Vaal Triangle

3.4 Declaration of an Emergency

The PSM or the Joint Planning Committee Chairman (in the absence of the PSM) will determine the level of the emergency for the station during an emergency.

3.5 Notification of an Emergency

Always call 5555 first for all life & plant threatening conditions.

The Electrical Control Desk will serve as the initial contact for all level 1 to 4 emergencies.

CONTROLLED DISCLOSURE

The Electrical Control Desk will initiate the emergency alarm and follow it up with an announcement over the PA system

In the case of any after-hours emergency, the Electrical Control Desk will notify the following Lethabo personnel:

- Power Station Manager
- Emergency Preparedness Coordinator
- Fire Chief
- Medical Centre
- Safety Risk Manager
- Environmental Officer
- and the EP CENTRE staff

3.6. Evacuation Plan

The plan provides the station with an effective means to respond to an emergency requiring a partial or total evacuation of the station for detail actions. It provides for the evacuation of staff, contractors and visitors, dispatches emergency response teams, activating of EP Centre and the establishment of operating procedures for an effective evacuation of the station.

3.6.1 Initial Response & Notification

- The evacuation officers will order evacuation of buildings. In the case of a site evacuation, only the PSM or in his absence, the Emergency Co-ordinator may order all staff to evacuate.
- The emergency co-ordinator will immediately notify the members of the EP CENTRE to activate the EP CENTRE.
- The primary means of communication will be via the station PA System, and thereafter by telephone, two way radio, cell phone and pager as back-up.
- The following staff will report to the EP CENTRE:
 - Emergency Preparedness Co-ordinator (EP CENTRE)
 - Joint Emergency Operational Centre members
 - Key Communicator including 4 assistants
 - Emergency Rescue Team members
 - Log Clerk
 - Scribe
 - Telephonist
 - Protective Services
 - Catering Services Staff
 - Area Controllers (by radio)

CONTROLLED DISCLOSURE

3.6.2 Emergency Preparedness Centre (EP CENTRE)

- The Emergency Preparedness Centre (EP CENTRE) serves as the central meeting point of contact with all local area controllers in the event of an emergency
- Members of the EP CENTRE will report to the EP CENTRE and implement an appropriate recovery response to the emergency. They will continuously evaluate and co-ordinate all activities during the emergency.
- The primary location of the EP CENTRE will be at the entrance of U2 auxiliary bay. The secondary site will be located at the Main Security Gate of Lethabo Power Station.
- Site maps; telephones; radio's; call lists; support staff; support equipment and emergency log and emergency plans are kept in the EP CENTRE.

3.6.3 Communications

- Commercial telephones would be the primary means of communications between fixed locations.
- The primary means between mobile locations would be via radio
- The EP CENTRE will be equipped with portable radios for communications purposes
- The following communication devices are available:
 - PA system
 - Telephones
 - Two-way radios
 - Fax
 - Cell Phone
 - Messengers
 - Local community radio
 - TV broadcasting service
 - EP centre has been equipped with Emergency Service telephone, number 5999 for use by external parties during emergencies and in case of enquiries

3.6.4 Evacuation Warning

- The primary means to warn the site of an emergency situation will be via a constant single tone alarm system that can be heard per seven zones or as one zone system
- The site will be informed of an evacuation will be via the PA system, and te message will be repeated.
- All buildings are equipped with fire alarms, and personnel may use these devices to initiate the alarm for evacuation
- Once occupants have been warned to evacuate, evacuees should immediately proceed to the appropriate assembly point

CONTROLLED DISCLOSURE

- The secondary means of communication will be a combination of the following means:
 - Telephones
 - Two way radios
 - Messengers
 - Fire department vehicles with loudspeakers
 - In the case of disasters, local community radio and/or TV broadcasting shall be used

3.6.5 Building Evacuation Procedure

Exit the building as calmly and quickly as possible using the nearest safe emergency exit.

“DO NOT USE ELEVATORS/LIFTS”

- Alert all persons in your area
- Turn off all ignition sources; close windows and doors; leave the doors unlocked and place a towel over your face in case of smoke
- Proceed to the assigned assembly point and wait for further instructions
- Stay away from buildings and windows
- Do not return to an evacuated area until permission is granted
- Area Controllers and Evacuation officers will assist with the evacuation of staff
- Evacuation plans are to be posted on all floors in office areas, and should indicate fire extinguishers; fire alarm stations; fire exit doors and first aid kits.

3.6.6 Assembly Areas

Depending on the hazard; wind conditions and the location of the incident, evacuees will be directed to one or more assembly areas listed below:

- South end of site at Plater shop entrance
- North end of site at the far end of the HV Yard
- West side of site at the main security gate
- East side of the site at Venna Venter Conference Centre
- All assembly area/s have been determined pro-actively by EP Co-ordinator
- Evacuation officers will take register of all staff
- EP CENTRE will arrange for food and/or shelter when circumstances requires
- All First Aid staff is requested to take along medical kits to the assembly point

3.6.8 Transportation

Lethabo transport will supply transport and/or shuttle service if and when required

CONTROLLED DISCLOSURE

3.6.9 Training; Exercises & Drills

- The EP Co-ordinator is responsible for overall coordination of EP training
- Emergency response exercises will be conducted to ensure adequacy of plans.
- Exercise will be conducted as per LBS00004PC.

3.7. Emergency Response Plan: Fires

3.7.1 Initial Response & Notification

- If you noted fire or smoke, immediately activate the nearest fire alarm station to warn occupants.
- An alarm will automatically sound on site
- Call the fire department on site
- If the fire is small and you have been trained, attempt to put out the fire with a fire extinguisher. Do this only after evacuation has started and the fire department had been called.

3.7.2 Specific Emergency Procedures

- If you choose not to fight the fire, quickly shutdown your PC, switch off all electrical equipment and shut all windows
- Exit the building as calmly and quickly as possible using the nearest safe exit
- Close all doors on the way out, but don't lock them
- Follow the normal evacuation procedure.
- Go to your assigned assembly area

3.7.3 Evacuation Officers

- Ensure all occupants has left the building
- Take roll call at the assembly point
- Report personnel not accounted for immediately to the nearest staff member and the area controller
- Stay with the occupants of your building until time to re-enter the building has been announced by the EP coordinator

3.7.4 Fire Officer

- Control the scene in terms of access
- Set up command post and activate disaster recovery plan
- Locate the fire if possible and direct fire fighters to it
- Prevent unwanted personnel from entering the building

CONTROLLED DISCLOSURE

3.7.5 Portable Fire Extinguishers

- Fire extinguishers should only be used by trained personnel
- If you have the slightest doubt, leave the area and set off the fire alarm
- Fight the fire only if:
 - The fire is small
 - You have a way out and you can fight the fire with your back to an exit
 - You have been properly trained in the use of fire extinguishers
- To operate a fire extinguisher, remember the word **PASS**:
 - **PULL** - the pin by grasping the extinguisher neck & removing the pin
 - **AIM** - the nozzle, hose or horn at the base of the fire
 - **SQUEEZE** - the handle to release the extinguisher agent
 - **SWEEP** - from side to side at the base of the fire until it is out
- Call the Fire Officer to replace the used fire extinguisher

3.8. Emergency Response Plan: Bomb Threats & Explosives

3.8.1 Initial Response & Notification

a. Receipt of Call

- Remain calm and try to obtain as much information as possible from the caller
- Get a co-worker to call security while you continue to talk to the caller
- If the caller does not indicate the location of the bomb and the time of detonation, ask for the information
- Listens closely to the voice to determine sex; age; accents; words used repeatedly
- If the caller is talkative, ask for his name and where about

b. After Receipt of Call

- Immediately call security services
- Notify your immediate supervisor
- Don't state the nature of the call to anyone except to security

3.8.2 Specific Emergency Requirements

a. Evacuation

- Establish a command post
- Do not evacuate until told to do so, since routes may be unsafe

CONTROLLED DISCLOSURE

- Security will control traffic very strictly
- If no bomb is found, the SAPS, Bomb Squad will decide when re-entry is permitted
- If terrorism is suspected, Security will take it up with the SAPS & SANDF jointly

b. Search Procedures

- The SAPS will be in charge of the search
- The search will be conducted by the SAPS or individuals authorised to do so
- Area controller, evacuation officer and personnel should remain in close proximity, but out of danger
- Under no circumstances should the suspected bomb be touched or moved
- Inform SAPS of any other suspicious objects in your location
- Only properly trained individuals are allowed to remove the suspected bomb

c. Explosions

- Pull the fire alarm
- Get out of the building as quickly and calmly as possible
- Avoid standing in front of windows
- Don't try and rescue other people
- It is important to know that the scene of a bombing is also a crime scene
- If trapped, cover your mouth with clothing and get underneath shelter to protect you from falling objects
- If terrorism is suspected, then Security will take it up with SAPS

In the light of these anticipated actions, the following **HIGH LEVEL GENERIC PLAN** will be used in case where terrorism actions are planned.

3.9 High Level Generic Bomb Threat Plan

3.9.1 Protective Services

- All gates shall be kept locked at all times and only open for entrance purposes (this includes the main security gate as well as Oscar Gate).
- As soon as Protective Services is aware of a possible explosives, the entrance area of the station shall be barricaded and the necessary road signs for limited entrance shall be displayed
- Protective Services shall only allow employees with a Lethabo ID Permit to access the premises
- All visitors entrance forms must be properly completed and authorised
- The following information shall be clearly indicated on all forms:
 - The name and ID of the visitor, including all passengers
 - The vehicle registration number, type of vehicle and colour

CONTROLLED DISCLOSURE

- The name of the host and purpose of the visit
- All employee, contractor and visitors vehicles shall be thoroughly searched prior to entering and exit of the premises.
- All business bags and handbags shall be thoroughly searched prior to entering and exit of the premises.
- Protective Services must increase their number of patrols and visits to strategic points on site
- Protective Services must look for possible evidence on the ground when visiting remote and off site area's.

3.9.2 Emergency Preparedness Team Members

- Confirm their telephone contact numbers with the Electrical Control Desk of any changes.
- Every member must identify a person that could stand in for him/her when not available.
- Every member must ensure that his/her emergency equipment is in good operational order.

3.9.3 Communication Flow

- During normal office hours:
 - Information from any recognised source to be sent to EP Chairman
 - The EP Co-ordinator informs the Power Station Manager
 - The MC members and relevant EP members will be briefed as and when required
- After hours and week-ends:
 - Security to inform the EP Co-ordinator immediately of any change of information on cell 083 650 5079
 - **Note!** If the EP Co-ordinator can't be contacted, then call the Production Manager on duty via the Electrical Control Desk at Tel 5604/5 who then has the duty to inform the EP coordinator
 - The EP Co-ordinator will inform the PSM
 - If necessary, the EP Co-ordinator will call-out all relevant EP members

3.9.4 Steps to be taken when explosive is found

- The EP CENTRE shall be activated
- DE(Gen) & SGM(PU2) shall be informed about the situation by the PSM
- The Power Station Manager (or his authorised stand-in) will act as the Lethabo spokesperson
- The Lethabo spokesperson may decide to draft a statement

CONTROLLED DISCLOSURE

- Any statement shall be forwarded to Eskom Spokesperson for authorisation prior to the issuing of any statement to the media
- Only thereafter shall the statement be issued to the media by the Power Station Manager

3.9.5 Ongoing activities

- The Lethabo Spokesperson shall ensure constant contact with Corporate Communication, Lethabo MC and the EP Team
- Logbook shall be kept to capture all activities with immediate effect, including today.
- Summary of all chronological events shall be sent through to Corporate Communication via Generation Communication
- Synopsis and analysis of the situation shall be sent to MD(Gen) & GM(CNR)

3.9.6 Crisis Communication CONTACT Team

- Corporate Communication Manager Tel: 800 5977
- MWP Control Centre Tel: 800 2073
- MWP Control Centre Emergency Number Tel: 800 6666
- MWP Security Tel: 800 6315
- Power Station Manager Tel: 457 5500
- EP Co-ordinator Tel: 457 5538

3.9.7 Communication Crisis Toolkit

- Communication section to prepare specific area with correct corporate identity background for the holding and issue of all press release statements
- Protective Services to ensure the necessary road block barricading and entrance signs are available
- Communication Section to ensure photography service

3.9.8 Back-up Services

- As per Lethabo emergency telephone list

3.10. Emergency Response Plan: Medical Emergencies

- In the event of a medical emergency act immediately; stay calm and reassure the victim.
- Call your first aid person to assist with the injured member.
- Do not move seriously injured persons.
- Render appropriate first aid to accident victims
- Do not transport seriously injured staff to the hospital. This will be done by Netcare after consultation with the Head of Medical

CONTROLLED DISCLOSURE

3.10.1 Initial Response & Notification

a. Life Threatening Conditions

- Check the scene for safety
- Check the victim for consciousness, breathing, pulse and severe bleeding
- Call for medical assistance immediately
- Watch signs for shock
- Do not remove the victim unless absolutely necessary
- Provide care if you had proper training
- If needed to transport victim to hospital by helicopter, the Lethabo helipad will be utilised

b. Non-Life Threatening Conditions

- Watch for changes in breathing
- Help the victim rest comfortably
- Keep the victim from getting chilled or overheated
- Reassure the victim
- Call for medical assistance immediately
- Departments/Sections are responsible to provide first aid for minor conditions such as cuts and scrapes with notification to the medical centre

3.10.2 Specific Emergency Procedure

a. Life Threatening Conditions

- Look, listen and feel for breathing
- If no pulse start with CPR
- If not breathing, give rescue breathing
- If you suspect the victim is choking, give abdominal thrusts (Do not slap victim on the back)

b. Inhalation Exposure

- Move victim to fresh air
- Keep the victim at rest and warm
- Start rescue breathing if breathing has stopped
- Do not leave unconscious victim unattended

c. Skin Exposure

- If only a small area is exposed, flood promptly with water and wash gently with soap

CONTROLLED DISCLOSURE

- Go to the nearest shower and flood with large amounts of water for 15 minutes
- Remove clothing while standing in the shower
- If chemicals are splashed on the head, eye protection should be left on until the chemical has been washed away
- Do not use chemical neutralisers on skin

d. Eye Exposure

- If chemical is splashed into eye go immediately to the nearest eye wash fountain
- Wash the eye for at least 15 minutes
- If no eye wash station is available, lay the victim on his/her back, turn the head, and pour water into the eye
- Do not attempt to remove foreign objects from the eye
- Cover the eye with a sterile pad and obtain medical assistance

e. Poisoning

- Report content of the container to the environmental officer and medical centre via phone
- Get assistance from the laboratory immediately
- Monitor breathing and care for shock
- Do not give anything by mouth unless to instruct to do so

f. External Bleeding

- Put on a pair of latex gloves
- Cover the wound with dressing
- Apply a pressure bandage snugly over the wound
- If bleeding still does not stop, apply extra dressings
- Remove foreign materials from small cuts and wash carefully with soap and water
- Apply an antiseptic and bandage

g. Shock

- Shock is life threatening
- Signs of shock is restlessness, irritability, extreme paleness, cold and clammy skin, weakness, vomiting, shallow breathing and a weak rapid pulse
- Do not give the victim something to eat or drink

h. Cryogenic (Cold) Burns

- For short contact, immediately flush the area with large quantities of water
- For prolonged exposure or if visible tissue damage is apparent, seek medical help immediately

CONTROLLED DISCLOSURE

i. Fractures

- Do not move the patient
- Check for proper circulation before and after splinting
- Treat for bleeding and shock

j. Strains & Sprains

- Have the victim lay down
- Apply ice to the injured area
- Elevate the injured area

k. Electrical Shock

- Disconnect power
- Do not use metal or anything that is wet
- Do not touch the victim until removed from circuit
- Check breathing and pulse and give appropriate care

l. Clothing Fire

- Proceed to safety shower
- If not, fall on floor and roll to smother flames
- Use fire blankets as last resort
- Do not use fire extinguishers
- Do not remove clothing from burnt skin

m. Thermal Burns

- Cool the burn area with large amounts of cool water
- Cover the burn with dry and clean dressing
- Don't apply ice to burn, unless it is very minor
- Watch for shock
- Call for medical assistance

n. Sudden Illness

- Help the victim to be comfortable
- Keep the victim from getting chilled or overheated
- Reassure the victim
- Watch for changes in breathing and consciousness
- Place on side if victim vomits

CONTROLLED DISCLOSURE

o. Seizure

- Do not hold or restrain the victim or place anything between the teeth
- Remove any objects that may cause injury
- Cushion the victims head
- Call for medical assistance

p. Diabetic Emergency

- Give the victim some kind of real sugar
- Call for medical assistance if no improvement in 5 minutes

q. Heat Related Illness

- Get the victim out of heat
- Loosen tight clothing
- Apply cool, wet cloths to the skin
- Fan the victim
- If victim is conscious, give cool water to drink
- Cal for medical assistance if victim refuses to drink water or starts to vomit

r. Hypothermia

- Call medical assistance
- Care for life threatening conditions
- Move victim to warm place
- Remove wet clothing and dry victim
- Warm the victim slowly
- Apply other sources of heat if available

3.11. Emergency Response Plan: Deaths

3.11.1 Initial Response and Notification

- Immediately notify the medical centre
- Immediately notify the PSM

3.11.2 Specific Emergency Procedure

- If death is a result of a work related injury, Safety Risk Management will report via the appropriate channels to all regulatory offices
- Security has to secure scene until the arrival of SAPS
- Security will prevent unauthorised access
- SAPS will conduct a full investigation

CONTROLLED DISCLOSURE

- PSM will convey the message of condolences to immediate family
- HR Manager will ensure that copies of death certificate; autopsy report; marriage certificate and birth certificate is on the employees personal file
- Investigation of the cause of the death is the responsibility of the medical practitioner

3.12. Emergency Response Plan: Chemical Hazards

3.12.1 Initial Response & Notification

- Any incident which endangers people, plant or environment should be treated as a major release
- The following are examples of chemical releases that should be considered major:
 - Combustible liquids
 - Toxic liquids
 - Concentrated Acids
 - Leaks from Gas Cylinders
 - Unknown chemical
 - Mineral spirits
 - Ammonia, Mercury
 - Sulphuric acid, Caustic Soda
 - Chlorine, acetylene
 - Vandalism or terrorism
- Do not attempt to clean up a major release
- If flammable or combustible liquids are released, turn off all sources
- Remain calm
- Evacuate persons in the immediate vicinity
- Remove injured personnel to fresh air
- Report hazardous releases immediately to the environment section
- Personnel should be properly trained in how to deal with spillage
- Wait in a safe place for the emergency team members to arrive
- Emergency teams will evaluate the hazard
- If necessary the EP CENTRE will be activated and staff will be ordered to evacuate
- Site security will be responsible for crowd control and to prevent entry into the area contaminated
- All individuals handling hazardous substances will be trained in the proper handling of such chemicals

3.12.2 Specific Emergency Procedure

- Determine the name of the chemical
- Do not touch the chemical
- Consult the MSDS
- Wear appropriate protective clothing
- Stop the leak by closing or isolating the source of the leak
- Follow the containment procedure for the specific chemical as detailed below

CONTROLLED DISCLOSURE

- Use appropriate absorbent material for small spills
- For large releases, use squeegee to bring liquid in contact with absorbents
- Push solids into a pile
- Check leaks on a frequent basis

3.12.3 Emergency Response Actions

- Where safe to do so the spill must be immediately contained using non-reactive material or be diverted to a remote location for recovery.
- For a mercury spill, a mercury vapour suppression solution can be used to wash areas.
- Sufficient time must be provided for the solution to react and then the area can be washed with water.
- For caustic soda, a small spill flushed with water. Larger spills should be contained and contractors used for the clean up
- For sulphuric acid, sand can be used for containment and a contractor used for spill clean up
- There are no containment measures for Chlorine Gas, the necessary barricading and ventilation will be carried out by the Emergency Response Team
- Chemical Services Have developed procedures for the proper handling of potential hazardous releases
- All individuals involved with hazardous chemicals should receive training in the proper handling of these chemicals as well as the emergency procedures therefore
- Emergency kits containing appropriate supplies to handle chemical releases are available from Chemical Services
- Oils containing PCB's must be dealt with in accordance with Eskom Standard ESKASAAC22.6.5.1 Procedure

Actions to be taken in the event of major chemical spill

- In the event of a serious chemical spill the environmental co-ordinator, chemist and emergency response team shall be notified immediately and provided with a brief description of the prevailing spill condition. The supervisor must make immediate arrangements to evacuate people from the immediate vicinity of the spill and barricade the area to prevent unwanted exposure of employees

Assessment of the spillage

- The emergency response team leader together with the chemist will evaluate the cause, extent and ultimate corrective action .The assessment shall include the following factors :
 - Identifying the source of the spill
 - The age of the spill
 - Life threatening conditions

CONTROLLED DISCLOSURE

- Weather conditions including rain and wind direction
- Properties affected (Eskom, neighbours, national roads)
- Traffic implications
- Threat to any water resources
- Soil types and
- Public relations threat

Confinement of the spill

- The emergency response team leader must arrange to confine the spill by either:
- Building of dams or dykes near the source of the spill
- Collecting the spilled material into the container
- Diverting (redirecting)the flow of the spill to a remote location where it v
- Can be easily recovered
- The following must be readily available to perform these operations:
- Shovels for building earthen dams
- Salvage covers for making catch basins
- Charged hose lines for creating division channels

Confinement of the spillage

- This is the act of stopping the further release of material from its container. The emergency response team leader must make the necessary arrangements to have the spill contained by an authorised technician that that is trained to perform this operation. This use of spillage response consultants is acceptable in cases where proper equipment or expertise is not readily available. Prompt containment of spillage is crucial to reduce the time needed for recovery operations.

3.12.4 Roles & Responsibilities when dealing with Chemical Spillages

- Emergency Fire Team members on shifts to attend immediately.
- The Shift Manager to call out the following emergency members:
 - Emergency Fire Team
 - Environmental Advisor
 - Chemical Services Manager
 - Ops Support Manager
 - Area Controller
- **Emergency Fire Team will:**
 - have training in hazardous material
 - barricade the area
 - set up incident command centre
 - Have software package for MSDS identification and handling

CONTROLLED DISCLOSURE

- **Environmental Advisor will:**
 - Asses the area
 - Give advice
- **Chemical Services Manager will:**
 - Know all chemicals used on site
 - Have emergency procedure
- **Area Controller will:**
 - Will take charge of the scene
 - Call Medical Centre
 - Call EP co-ordinator
 - Use Security to control access
 - Inform Security not to delay entrance to outside help
- **Ops Support Manager will:**
 - Be responsible to arrange for cleaning on time
 - Contain the spill
 - Ensure we have the following upfront:-
 - Spill containing material e.g. sand bags
 - Correct PPE for 6 people (minimum)
 - Cleaning equipment
 - Safe work procedure
 - Risk assessment on all areas identified
 - Station cleaning is trained to handle & clean chemicals used on site
 - Know which companies to call if outside help is required

3.13. Emergency Response Plan: Asbestos

3.13.1 Initial Response & Notification

- Prevent access to contaminated area
- Shut & lock doors
- Report the spill
- Do not attempt to clean up the area

CONTROLLED DISCLOSURE

3.13.2 Specific Emergency Procedure

a. Major Release

- Call a licensed asbestos contractor to clean up
- SRM to ensure the site is secured until arrival of asbestos contractor
- If necessary, evacuation of area and/or building will be ordered

b. Dam overflow

- Should an incident occur ,environment must be notified
- Environment should notify Department of Environment and Department of Water Affairs immediately.
- An INO shall be completed within 24 hours and sent to environment
- An investigation shall be conducted and in the process chemical services must be notified to take a water sample
- SAP close-out will be done by environment and the relevant investigation personnel as investigation when investigation is loaded.

c. Ground water pollution

- Should an incident occur ,environment must be notified as per LBE22005 Rev 02
- Environment should notify Department of Environment and Department of Water Affairs immediately.
- An INO shall be completed within 24 hours and sent to Lethabo environmental section as per LBE22005 Rev 02 and Water Use License.
- An investigation shall be conducted and in the process chemical services must be notified to take a water sample, if the water has seeped into the soil, identify the product that spilled, volume of the spillage ,know the characteristics of the soil it will help to know the depth of sampling, then a soil sample can be done by external consultant
- SAP close-out will be done by environment and the relevant investigation personnel as investigation when investigation is loaded.
- Lethabo Environmental section will decide future plans after the investigation either boreholes to monitor pollution or rehabilitation of that specific area.

d. Minor Release

- SRM to assess the spill
- Use licensed asbestos contractor for clean up

e. Clean Up Process

- Secure the area
- Assess potential for fibre release

CONTROLLED DISCLOSURE

- Assess the need for PPE
- Use proper respiratory protection
- Prevent fibres from being re-suspended by wetting down the area
- Deposit all debris into plastic asbestos bag, seal & use a licensed contractor for disposal. Follow the Lethabo waste Procedure for correct disposal practices.
- Do not dispose in regular trash
- Take clearance samples before re-occupancy of the area

3.14. Emergency Response Plan: X-Ray Equipment

3.14.1 Initial Response & Notification

- In the case of overexposure from x-ray equipment, immediately turn off the source
- Call medical assistance
- Notify the Radiation Officer (RPO) from the Chemical Section or the assistant RPO from MMS
- Keep persons contaminated to remain in the area until surveyed

3.14.2 Specific Emergency Procedure

- Safety Risk Manager to investigate the incident
- Shut down the equipment if leakage of radiation is above permissible limits
- Electrical Control Desk to announce via the PA system every time X-ray to be conducted
- Any release of radiation to be reported via Lethabo Occurrence Management System
- Evacuate all personnel from the area
- Restrict access to contaminated areas

3.15. Emergency Response Plan: Blood Spills

3.15.1 Initial Response & Notification

- Do not attempt to clean up the blood spill
- Only properly trained staff may clean up blood spills

3.15.2 Specific Emergency Procedure

- Secure the area
- Use disposable gloves
- Wear rubber utility gloves when cleaning surfaces
- Dispose of the bag as infectious waste with a licensed disposal contractor. Follow the Lethabo Waste Procedure for correct disposal practices.
- Call the medical centre staff immediately for assistance

CONTROLLED DISCLOSURE

- Wear appropriate PPE such as gloves; eye protection; gowns; masks and mouthpieces to prevent exposure to blood and other potentially infective body fluids

3.16. Emergency Response Plan: Utility Failure

3.16.1 Emergency Shutdown

a. Electrical

- According to the ORHVS, any person can switch open – only such breakers or switches as may be necessary to avoid imminent danger to life or damage to apparatus. Immediately contact Electrical Control Desk and inform them after such switching has been done.

b. Flooding

- Do not use electrical equipment in the area of flooding
- Building occupants had to be told if sewerage systems cannot be restored in a reasonable time
- Use plastic sheeting to protect equipment

c. Gas leak

- If you smell gas or hear blowing or hissing noises, open windows and leave the area immediately
- Activate the fire alarm
- Facility Maintenance will dispatch a plumber to the scene

d. Telephones

- Report telephone failures to the switch board operator
- Check in the meantime for other means of communications in the case of emergency

e. Elevator Failure

- If trapped inside an elevator, use the emergency procedure as inside the elevator
- Pull the alarm if the elevator does not have a telephone
- The electrician will attempt to rescue you
- Stay calm until rescued

3.16.2 Structural Damage

- Call Facilities Maintenance
- If necessary, evacuate the building

CONTROLLED DISCLOSURE

- Barricade the building and allow security to exercise access control
- Facilities Maintenance will take appropriate actions to correct problem
- Once the structural part of the building is sound, re-entry into building will be allowed
- SRM will take pictures and submit with occurrence report

3.17. Emergency Response Plan: Terrorism

3.17.1 Initial Response & Notification

- Terrorism is the use of violence or force against people or the environment. Although terrorism can be in various forms, bombings are the most frequently used method.
- After a terrorist attack the following could happen:
 - Damage to buildings
 - Large number of casualties
 - Disruption in services
 - Strong public fear can continue for long periods
 - Workplaces & schools may be closed
 - Restrictions on travelling
 - Evacuation of areas may occur
 - Clean up activities may take months
- Response to a terrorist attack may involve little or no warning
- If an evacuation is needed it will be handled as described in the beginning of this manual

3.17.2 Hazards

- Explosives is the easiest weapon for terrorists attacks
- 70% uses conventional explosives and less than 5% of actual bombings were preceded by a threat
- Conventional explosive will be handled as describe in the section Bomb Threats
- Terrorists incidents involving chemicals will be handled as described in the section Chemical Hazards

3.17.3 Suspicious Packages, Letters & Powders

- Terrorism attacks can come in the form of suspicious packages; letters and powders
- Identification characteristics are:
 - Excessive postage
 - No postage
 - No return address

CONTROLLED DISCLOSURE

- Incorrect spelling of names and addresses
 - Unexpected parcels
 - Excessive weight
 - Marks and dirt
 - Distorted handwriting
- If you identify a suspicious package or letter put it immediately down, do not open, shake or bump
 - Leave the room immediately
 - If powder is present turn off fans immediately
 - Do not allow anyone to enter until declared safe for use
 - List all people who were in the room and give information to police services
 - In order to counter act terrorism attacks, ensure proper housekeeping at all times

3.17.4 Reducing Vulnerability to Bomb Attacks

- Restrict parking to 100 meters from buildings
- Highly visible security patrols are a significant deterrent
- Establish controls for positively identified individuals
- Install detection devices
- Implement an electronic biometric access control system

3.18. Emergency Response Plan: Industrial Strikes

In the light of anticipated IR actions, the following emergency contingency actions are requested with immediate effect:

3.18.1 Execution of Contingency Plan

- The plan shall be executed in three phases:
 - Phase 1 – Preparation
 - Phase 2 – Execution of Action
 - Phase 3 - Debriefing

3.18.2 Preparation Phase

a. Protective Services

- As soon as Protective Services becomes aware of a possible mass action demonstration, signs for limited entrance shall be displayed
- Protective Services shall exercise their authority in terms of the NKP Act.
- Protective Services shall only allow employees with a Lethabo ID Permit to access the premises
- All visitors entrance forms must be properly completed and authorised

CONTROLLED DISCLOSURE

- All contractors and visitors vehicles shall be thoroughly searched prior to entering the premises

b. Management Team Members

- Confirm their telephone contact numbers with the Electrical Control Desk of any changes
- Every member must identify a person that could stand in for him/her when not available

c. Communication Flow Management during Mass Action/Strikes

- Information from source is sent to IR
- The IR informs the Power Station Manager
- The MC members will be briefed as and when required by the PSM

d. Logistic Support

- HR Manager to initiate process for toilettes; water; food & medical support
- HR Manager to communicate that the anticipated gathering point is between scoreboard & cooling tower.
- IR to ensure that a person has been identified to exercise route control
- HR Manager to ensure that picketing rules has been communicated to all staff

3.18.3 Execution Phase

a. Steps to be taken when media arrive for unplanned interviews

- Power Station Manager shall decide if it is needed to activate the Visitor Centre as a Media Centre
- The Power Station Manager (or his delegated stand-in) will act as the Lethabo spokesperson
- DE(Gen) and SGM(PU2) shall to be informed about the situation at all times

b. Ongoing activities

- IR section shall be responsible to monitor the movements of labour members
- Logbook shall be kept by IR section to capture all activities on the ground
- Summary of all chronological events shall be sent through in synopsis format of the situation to MD(Gen)
- Management will gather at times as requested by PSM
- PSM will arrange with HR Manager with regards to any internal communication

3.18.4 Debriefing Phase

a. De-Briefing

CONTROLLED DISCLOSURE

- IR section to arrange and chair the de-briefing session as soon as possible after the action is over

3.19. Emergency Response Plan: Natural Disasters

3.19.1 Floods

- Floods are the most common and widespread of all natural disasters
- At Lethabo, the site is situated underneath the Vaaldam wall and is located next to the Vaal River
- Prevention of this could require the following actions:
 - Ensure adequate pumps; generators; sandbags; tarpaulins and emergency lighting
 - Ensure all pumps are operable
 - Prepare for disruption of electricity; fire alarm and flooded basements
- During a flood, monitor the weather forecast at all times
- Pump water out and monitor storm drains for back-up
- Turn off lights
- Begin sand bagging if needed
- Provide barriers and seal door openings as needed

3.19.2 Hurricanes

- Upon indications of possible hurricane, review evacuation plan and consider evacuating the site
- Assist in warning the site
- Notify members of the EP CENTRE and identify alternative EP CENTRE
- Provide traffic control

3.19.3 Thunder Storms and Lightning

- Be alert of possible flooding
- Use the precautions as stipulated previously in this planning document

3.19.4 Earthquakes

- Maintain contact with civil protective services
- Ensure adequate supply of barricades
- Be aware of possible floods
- Ensure the availability of generators; food stocks; emergency lights and cleaning supplies
- Prepare for possible power failures

CONTROLLED DISCLOSURE

- Ensure everybody knows the evacuation routes
- Secure all structures; shelves; PC equipment; etc

3.19.5 Lightning Strike

If thunder happens within 30 seconds of lightning, then the storm is within 10 kilometres of your location. Lightning safety experts consider this the strike danger zone and advise people to follow the 30/30 rule.

The 30/30 rule

Follow the precautions outlined below when thunder is heard within 30 seconds of a lightning flash and wait for 30 minutes after the last thunder is heard to resume your activity. If you're unable to take shelter inside, find the safest accessible location and stay there until the storm has passed.

General precautions:

- Stay away from metal poles, fences, clothes lines etc.
- Never ride horses, bicycles or drive in open vehicles.
- If driving, slow down or park away from trees, power lines or other objects that may be damaged by storm activity.
- Stay inside metal-bodied (hard top) vehicles or caravans but do not touch any metal sections.
- Avoid large trees, hilltops and other high places.

If shelter is not available:

- Crouch (alone, feet together), preferably in a hollow. Make yourself a small target.
- Remove metal objects from head/body.
- Do not lie down (the more of you that is in contact with the ground, the more 'attractive' you are to lightning) but avoid being highest object.
- If your hair stands on end or you hear buzzing on nearby rocks, fences etc, move immediately. At night, a blue glow may show if an object is about to be struck.
- Stay away from high and low points (hilltops, ridges & gullies), rock overhangs and shallow caves.
- Keep out of, and well away from, water bodies or watercourses.
- Keeping hands off the ground.
- Spread group members out – about ten metres apart, but within calling distance.
- Never shelter under tree/s.

First aid

CONTROLLED DISCLOSURE

- Apply immediate CPR to lightning victims until medical help arrives. (You won't receive a shock from the victim.)
- If a person is struck by lightning, there is no residual charge left on the body. The quick application of CPR may maintain vital body functions until medical help can be obtained

3.20. Emergency Disaster Recovery Plan

3.20.1 Restoration of Facilities

- The Head of EP will request a recovery team that will estimate the extent of the damages
- SRM will document damage through photo's
- PSM will compile all news reports as part of our communication strategy/plan
- Salvage operations will start as soon as building is declared safe
- Restoration of loss of utilities shall be done as described in the previous section for Utilities
- Environmental Advisor will arrange Rehabilitation for natural areas

3.20.2 Restoration of Operations

- Purchasing section will use local vendors as much as possible to replace needed items
- The identified recovery team will establish a plan for resuming operations
- All areas will be properly secured from unauthorised entrance
- Fire Chief will ensure that fire alarm is back in service
- Telecommunication will be a top priority during restoration process
- All computer back-up services will be verified
- The EP CENTRE staff will make decisions regarding the relocation of offices
- Every department will follow their own recovery plans
- Recovery plans to be drawn up per section/dept or building

3.21. Post Traumatic Plan

3.21.1 Definitions and terms used to describe trauma:

- **Emotional** – shocked, devastated, it blew me apart, I could not get myself back together, I fell apart, I just can't face it anymore
- **Mental** – I can't get it out of my mind
- **Physical** – I felt sick in the stomach, I couldn't sleep

3.21.2 Preparedness Plan

- Formal crisis communication plan exists to address employees, the media, community groups, and head office staff

CONTROLLED DISCLOSURE

- Security plan to be in place to ensure safety of personnel and property
- EAP section to ensure procedures is in place to handle post-traumatic stress in the aftermath of the disaster
- Procedures to manage employee layoffs; leave and absence

3.21.3 Specific Post Traumatic Planning Procedure

- Establish a traumatic meeting place that is safe and private enough
- Venue should be comfortable and equipped with coffee; tea; sugar and soft drinks; biscuits; etc for use during the post trauma phase
- Provide basic facts about trauma
- Focus on the natural ability of everyone to cope
- Train EAP staff in disaster mental stress support

3.21.4 Specific Traumatic Activities

- Identify employee with specific medical matters i.e. pregnant woman; diabetes; etc
- Provide contact details for those who wish to talk more
- Let people go when they are ready
- If a worker has been killed a mark of respect should be visible on site until after the funeral
- Procedurise what to do in the event where someone does not come back to work
- Guard these people against disruption
- Let people speak, or not speak, whichever they prefer
- Watch for people not coping

3.22. Awareness

- Implement awareness posters in the station
- Ensure E-Prep management is part of the Lethabo Induction Program
- Ensure integration of Environment with all Emergency Risk related activities

3.23. Education and Training

The following will be concentrated upon in terms of training:

- All appointed Evacuation officers must do a course in evacuation prior to appointment authorisation
- The station shall execute at least one integrated exercise per annum
- All departments must execute at least two evacuation drill exercise per annum

3.24. Risk Reduction

- All procedures to be updated and enhanced every 3 years

CONTROLLED DISCLOSURE

- Station emergency appreciation to be updated every 3 years
- Station Emergency Risk Response Plan to be updated whenever changes has taken place
- Continuous risk assessments to be conducted and catered for in the plan
- Periodic exercises must be executed

3.25. Support Plans

The following support plans must be maintained and submitted to the EP CENTRE:

- Evacuation plans for Dept/Sections
- Emergency equipment/ tools register
- Awareness plans
- Assembly point layout plan

3.26. Emergency Exercise/Training Evaluation

3.26.1 Exercises

- Authorisation for exercises must be obtained via the EP Coordinator
- The proposed format for exercise preparation shall be adhered to.

3.26.2 Evaluation

- All exercises shall be concluded with a proper debrief session
- A debrief report shall be forwarded to the EP Coordinator
- Deficiencies shall be recorded in writing and forwarded to the EP Coordinator

4. AUTHORISATION

This document has been seen and accepted by:

Name	Designation
B Phahle	Risk & Assurance Manager
G Stapelberg	Business Improvement Manager
L Monnakgotla	Maintenance Manager
H Sewsunker	Engineering Manager
M Tsoaeli	Finance & Services Manager
N Gatebe	HR Manager
V Mokoena	Acting Operating Manager
R Hartman	Production Manager – Primary Energy
JC Els	Production Manager – Outside Plant
S Ntjio	Production Manager – Units 1-3
P Motaung	Production Manager – Units 4-6

CONTROLLED DISCLOSURE

Name	Designation
M Hariram	Environmental Manager
T Modise	Project Manager
C Pires	Outage Manager

5. REVISIONS

Date	Rev.	Compiler	Remarks
19 May 2008	01	G Stapelberg	Manual has been revised considerable to include responsibilities for all EP key staff during non emergency as well as during emergency situations.
5 August 2008	02	G Stapelberg	Cosmetic changes to format in terms of ISO 9001
21 May 2009	03	G Stapelberg	5.12.4 Insert roles & responsibilities in case of chemical spillages 5.19.5 Include lightning strikes
09 Sep 2010	04	G Stapelberg	Update the plan its evacuation; activation of EP centre & role and responsibilities
08 Jan 2014	05	M Phindulo	Update the environmental emergency response plan 1.Introduction 2.2 definitions 2.3 abbreviations 3.13.2. b and c

6. DEVELOPMENT TEAM

- G Stapelberg

7. ACKNOWLEDGEMENTS

- Not Applicable

CONTROLLED DISCLOSURE