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# 75MW THERMAL PLANT AS PART OF THE HYPERION HYBRID FACILITY NEAR KATHU, NORTHERN CAPE PROVINCE

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## ENVIRONMENTAL MANAGEMENT PROGRAMME

February 2021

**Prepared for**

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## PROJECT DETAILS

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<b>DEA Reference</b>	:	14/12/16/3/3/2/2019
<b>Title</b>	:	Environmental Impact Assessment Process Environmental Management Programme: 75MW Thermal Plant as part Hyperion Hybrid Facility Northern Cape Province
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## DEFINITIONS AND TERMINOLOGY

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The following definitions and terminology may be applicable to this project and may occur in the report below:

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

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

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

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

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

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

**Construction:** Construction means the building, erection or establishment of a facility, structure or infrastructure that is necessary for the undertaking of a listed or specified activity as per the EIA Regulations. Construction begins with any activity which requires Environmental Authorisation.

**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.

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

**'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 is 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 Authorisation (EA):** means the authorisation issued by a competent authority (Department of Environmental Affairs) of a listed activity or specified activity in terms of the National Environmental Management Act (No 107 of 1998) and the EIA Regulations promulgated under the Act.

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

**Environmental Control Officer (ECO):** An individual appointed by the Owner prior to the commencement of any authorised activities, 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

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

**Environmental impact assessment:** Environmental Impact Assessment, as defined in the NEMA EIA Regulations, is a systematic process of identifying, assessing and reporting environmental impacts associated with an activity.

**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 (EMPr):** A plan that organises and co-ordinates mitigation, rehabilitation and monitoring measures in order to guide the implementation of a project or facility and its ongoing maintenance after implementation.

**Environmental Officer (EO):** The Environmental Officer (EO), 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. The EO 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.

**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.

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

**Incident:** An unplanned occurrence that has caused, or has the potential to cause, environmental damage.

**Indirect impacts:** Indirect or induced changes that may occur because 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 because 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 public.

**Method Statement:** 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.

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

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

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

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

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

**Vulnerable species:** A taxon is Vulnerable when it is not Critically Endangered or Endangered but is facing a high risk of extinction in the wild in the medium-term future.

**Waste:** Any substance, material or object, that is unwanted, rejected, abandoned, discarded or disposed of, or that is intended or required to be discarded or disposed of, by the holder of that substance, material or object, whether or not such substance, material or object can be re-used, recycled or recovered and includes all wastes as defined in Schedule 3 to the Waste Amendment Act (as amended on June 2014); or any other substance, material or object that is not included in Schedule 3 that may be defined as a waste by the Minister by notice in the *Gazette*.

## ABBREVIATIONS

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The following abbreviations may be applicable to this project and may occur in the report below:

BGIS	Biodiversity Geographic Information System
CBA	Critical Biodiversity Area
DEFF	Department of Environment, Forestry and Fisheries (National)
DHSWS	Department of Human Settlements, Water and Sanitation
CBA	Critical Biodiversity Area
CR	Critically Endangered
CSIR	Council for Scientific and Industrial Research
DM	District Municipality
DMRE	Department of Mineral Resources Energy
EAP	Environmental Assessment Practitioner
EGIS	Environmental Geographic Information System
EIA	Environmental Impact Assessment
EMF	Environmental Management Framework
EMP	Environmental Management Plan
EMPr	Environmental Management Programme
EN	Endangered
EP	Equator Principles
ESA	Ecological Support Area
GA	General Authorisation
GHG	Greenhouse Gas
IBA	Important Bird Area
IDP	Integrated Development Plan
IEM	Integrated Environmental Management
IEP	Integrated Energy Plan
IFC	International Finance Corporation
IPP	Independent Power Producer
IRP	Integrated Resource Plan
IUCN	International Union for Conservation of Nature
I&AP	Interested and Affected Party
km	Kilometre
kWh	Kilowatt hour
LC	Least Concern
LM	Local Municipality
LNG	Liquid Natural Gas
m	Metre
m <sup>2</sup>	Square meters
m <sup>3</sup>	Cubic meters
m amsl	Metres Above Mean Sea Level
MW	Megawatts
NDP	National Development Plan
NEMA	National Environmental Management Act (No. 107 of 1998)
NEM:AQA	National Environmental Management: Air Quality Act (No. 39 of 2004)
NEM:BA	National Environmental Management: Biodiversity Act (No. 10 of 2004)

NEM:WA	National Environmental Management: Waste Act (No. 59 of 2008)
NFA	National Forests Act (No. 84 of 1998)
NFEPA	National Freshwater Ecosystem Priority Area
NHRA	National Heritage Resources Act (No. 25 of 1999)
NT	Near Threatened
NWA	National Water Act (No. 36 of 1998)
ONA	Other Natural Area
PA	Protected Area
RMIPPP	Risk Mitigation Independent Power Producer Procurement
SAHRA	South African Heritage Resources Agency
SAHRIS	South African Heritage Resources Information System
SAIAB	South African Institute for Aquatic Biodiversity
SANBI	South African National Biodiversity Institute
SDF	Spatial Development Framework
TOPS	Threatened or Protected Species
VU	Vulnerable



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## **CHAPTER 1: INTRODUCTION**

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This Environmental Management Programme (EMPr) has been compiled for the 75MW Thermal Plant and associated infrastructure proposed by Hyperion Solar Hybrid (Pty) Ltd (the developer). The 75 MW thermal generation plant combined with the already authorised solar PV facilities will be known as the Hyperion Hybrid Facility. The Thermal Facility will be located within the footprint of the authorised Hyperion 1 & 2 Solar PV project site, Remainder of Farm Lyndoch 432, located approximately 22km north of Kathu within the Gamagara Local Municipality which falls within jurisdiction of the John Taolo Gaetsewe District Municipality, Northern Cape Province.

This EMPr has been developed on the basis of the findings of the Environmental Impact Assessment (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 employees and contractors working on the pre-construction, construction, and operation and maintenance phases of the project. In terms of the Duty of Care provision in S28(1) of NEMA, 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, halted or minimised. The document must therefore be adhered to and updated as relevant throughout the project life cycle. This document fulfils the requirement of the EIA Regulations, 2014 (as amended) and forms part of the EIA Report for the project.

## CHAPTER 2: PROJECT DETAILS

Hyperion Solar Hybrid (Pty) Ltd is proposing the development of a hybrid generation facility consisting of a fully dispatchable, dual fuel (liquid or gas) thermal generation plant that will operate in combination with the authorised Hyperion 1 & 2 Solar PV Energy Facilities. The 75 MW thermal generation plant combined with the already authorised solar PV facilities project will be known as the Hyperion Hybrid Facility. The Thermal Facility will be located within the footprint of the authorised Hyperion 1 & 2 Solar PV project site, Remainder of Farm Lyndoch 432, located approximately 22km north of Kathu within the Gamagara Local Municipality which falls within jurisdiction of the John Taolo Gaetsewe District Municipality, Northern Cape Province.

The addition of the Thermal Facility and associated infrastructure to the authorised Hyperion Solar PV facilities is to create a hybrid facility has been initiated by Hyperion Solar Development (Pty) Ltd in response to the procurement process initiated by the Independent Power Producer Office (IPP Office) in August 2020 for the procurement of up to 2000MW of dispatchable generation capacity from a range of technologies. This allocation is in accordance with the new generation capacity required as specified in the Integrated Resource Plan 2019 and accompanying ministerial determination from the Minister for the Department of Mineral Resources and Energy (DMRE) to which the National Energy Regulator of South Africa (NERSA) has concurred. The aim of the hybrid facility is to meet the Risk Mitigation Independent Power Producer Procurement Programme (RMIPPPP) requirement of being 100% dispatchable between the hours of 05h00 and 21h30.

### 2.1 Project Site

**Table 0.1** provides information regarding the proposed project site identified for the Thermal Plant, and also includes information regarding the properties that may be impacted by the upgraded access road.

**Table 0.1: A description of the project site identified for Hyperion Thermal Plant and upgraded access road.**

Province	Northern Cape Province
District Municipality	John Taolo Gaetsewe District Municipality,
Local Municipality	Gamagara Local Municipality
Ward number(s)	7
Nearest town(s)	Kathu (~22km south of the project site); Deben (~18km west of the project site); Kuruman (~34km north east of the project site) and Hotazel (~41.6km north of the project site)
Farm name(s) and number(s)	75MW Thermal Dual Fuel Facility » Remainder of the Farm Lyndoch 432  Access Road: » Remainder of Farm 457 » Portion 1 of Farm 457 » Portion 2 Farm 457 » Remainder of the Farm Lyndoch 432
SG 21 Digit Code (s)	75MW Thermal Dual Fuel Facility » C0410000000043200000

	Access Road » C04100000000045700000 » C04100000000045700001 » C04100000000045700002 » C04100000000043200000
Current zoning	Agricultural (grazing of cattle)
Current land use	Agriculture

A locality map illustrating the location of the project site and access road is provided in **Error! Reference source not found.**

## 2.2 Project Description

The proposed project will comprise the following key infrastructure and components:

- » Reciprocating Gas Engines
- » Access road
- » Truck entrance and parking facility
- » Regasification plant and fuel preparation plant
- » Dry cooling system for operating oils/chemicals
- » Fuel off-loading facility
- » Fuel storage facility
- » Water demineralisation plant
- » Cabling, O&M building, fencing, warehouses and workshops

A summary of the associated infrastructure proposed as part of Thermal facility is provided in **Table 2.2**, and described in more detail under the sub-headings below. **Figure 2.2** provides an overview of the layout proposed for the project.

**Table 0.2: Planned infrastructure proposed as part of the Thermal Facility**

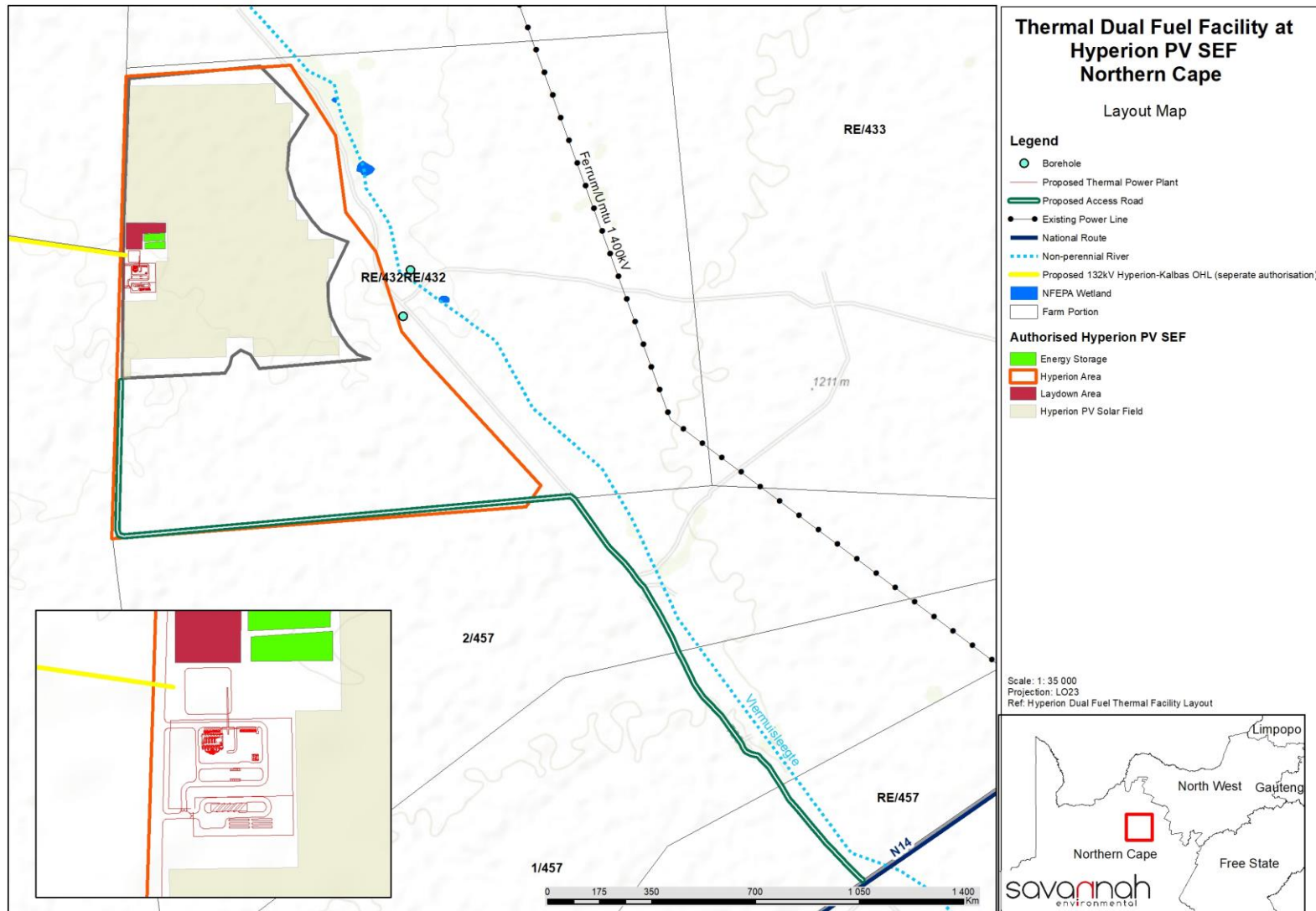
Component	Description/ Dimensions
Location of the site	» <b>75MW Thermal Power Dual Fuel Facility and access road:</b> Remainder of the Farm Lyndoch 432  <b>Access Road:</b> » Remainder of Farm 457 » Portion 1 of Farm 457 » Portion 2 of Farm 457
Landowner	All of the affected properties of the thermal facility are privately owned. Part of the access road is provincial road.
Municipal Jurisdiction	John Taolo Gaetsewe District Municipality and the Gamagara Local Municipality
Electricity Generating capacity (Thermal Facility)	75MW
Proposed technology	» Reciprocating Gas Engine technology
Extent of preferred project site	» 340ha
Extent of the development footprint	» <b>Thermal plant:</b> Up to 5ha (considering the Thermal generation facility and associated infrastructure) » <b>Access road:</b> 8.5 km in length and approximately 8-12 wide

Component	Description/ Dimensions
<b>Stack dimensions (Site elevation: 1178 m above mean sea)</b>	» Reciprocating Gas Engine Stack Height: 25m above ground level
<b>Fuel Sources</b>	LGP will be selected as a fuel source: » <b>LPG:</b> LPG supply from a reputable South African supplier from either Richards Bay or Saldanha will be delivered to the power plant by LPG road tankers to the thermal generation facility via the N14 and stored in mounded bullet tanks above ground with a capacity of 5500m <sup>3</sup> .
<b>Site access</b>	» Main access to the project site will be via the T26 road which will be upgraded and surfaced, and will cross Remainder of Farm 457, Portion 1 of the Farm 457, and Portion 2 of the Farm 457.
<b>Grid connection</b>	» The thermal generation facility and therefore the hybrid facility will be connected to the national grid via a 132kV overhead power line that will connect to an existing Eskom substation. A separate basic assessment process is being undertaken for the 132kV overhead line, hence it has not been assessed within this EIA report.
<b>Associated infrastructure to the Thermal Plant</b>	» Access road » Water demineralisation plant » Internal water, air and gas pipelines » Control and electrical buildings, including a central control room » Firefighting systems » Bulk water storage » Truck entrance and parking facility » Fuel off-loading facility » Fuel storage facility » Regasification plant and fuel preparation plant » O&M building, warehouses, workshops, cabling and fencing » Storage facilities for fuels, gas and chemicals » Effluent reticulation systems - i.e. 1) sanitary wastewater system; 2) oily water collection system and 3) storm water and rainwater collection system. » Dry Cooling systems for operating oil/chemicals » Balance of plant systems » Generator and Auxiliary transformers
<b>Services required</b>	» Waste disposal: all waste material generated from the development will be collected by a suitable contractor and the waste will be disposed of at a licensed waste disposal site off site. This service will be arranged with the municipality or an independent waste management service provider when required. » Sanitation: during construction, all sewage waste will be collected by a contractor to be disposed of at a licensed waste disposal site. This service will be arranged with the municipality or an independent waste management service provider when required. During operation, the facility will be connected to the municipal sewer system. » Water: Water is to be sourced from the existing borehole on site. The construction phase of the thermal generation facility will require approximately of 45 000m <sup>3</sup> for construction per annum. Water

Component	Description/ Dimensions
	<p>volumes for emission control depending on the level of dispatch is approximately 38 000 m<sup>3</sup>.</p> <ul style="list-style-type: none"> <li>» Electricity: the electricity requirements for this facility are to be obtained from the municipality. This service will be arranged with the municipality when required.</li> </ul> <p>Services agreements will be entered into. No agreements for the above services have been obtained as of yet.</p>
<b>Raw/Process-Water Storage Reservoir</b>	<ul style="list-style-type: none"> <li>» Raw water and water for fire-fighting purposes will be located on site (300m<sup>2</sup>).</li> <li>» A 5-ton self-contained water treatment plant will be installed to treat the water from the borehole.</li> <li>» Treated water will be stored in a 10m<sup>2</sup> tank.</li> <li>» Process water to go into conservancy, and serviced by independent service provider (no sludge or brine to be produced)</li> </ul>







**Figure 0.2:** Map illustrating the proposed project layout prepared for the Thermal Plant and upgraded access road

## **2.3. Life-cycle Phases of the Thermal Facility**

### **2.3.2. Construction Phase**

Construction of the thermal power facility and associated infrastructure is expected to take up to 14-20 months depending on the lead time for equipment and any contractual timing requirements. The construction activities involve the following:

- » Prior to initiating construction, a number of surveys will be required including, but not limited to site survey and confirmation of the thermal facility footprint and location of exhaust stacks key components.
- » Site preparation activities will include clearance of vegetation and excavations for foundations and internal roads. These activities will require the stripping of topsoil, which will need to be stockpiled, backfilled and/or spread on site.
- » Thereafter civil works will take place which involves concrete works for structures such as foundation, the production unit (which houses the engines/turbines, generator, engines and so forth), stacks, cooling towers (if applicable), substation and associated infrastructure.
- » Civil works for water demineralisation processing plant.
- » Mechanical and electrical work will then follow.
- » Ancillary infrastructure such as guard house, admin building, workshops and a warehouse will be established.
- » Storage facilities for LPG or diesel will be constructed.
- » Water storage for both treated water from the bulk water supplier and demineralised water will be established.
- » As construction is completed in an area, and as all construction equipment is removed from the site, the site will be rehabilitated where practical and reasonable.

Employment opportunities to local community members will be available during the construction phase of the project. Approximately 350-500 positions will be available over the construction phase and approximately 20 employment opportunities will be for permanent positions which will transition into the operation phase of the development. Employment opportunities will include highly skilled, skilled and semi-skilled positions. Highly skilled positions will be limited. Employees will not reside on the project site and will be accommodated in the Kathu area.

### **2.3.3. Operation Phase**

Prior to the operation of the thermal facility, testing and trials will need to be undertaken. The proposed facility will create approximately 20 permanent employment positions (dependent on final generation technology chosen) that will be retained for the 20-year life of the project. The permanent employment positions will include highly skilled, skilled and semi-skilled positions.

It is anticipated that there will be full time security, maintenance and control room staff required at the site.

#### **i) Operating Regime**

As the Dispatchable Facility of the Hybrid Power Project solution, the 75W Thermal Plant could be required to operate 16.5 hours a day, 7 days a week (6000 hours per year and 365 starts per year of operation), if the Hyperion PV Facility (Non-Dispatchable) is unable to meet demand.



## ii) **Scheduling and Dispatch Control System**

For the Hybrid Project to operate in accordance with the RFP obligations, the grid code and in a cost-optimised manner, there will be a single overarching control system (the Scheduling and Dispatch Control System or SDCS). Broadly speaking the SDCS will receive Dispatch Instruction from Eskom and issue appropriate instructions to the 75MW Thermal Plant and the Hyperion PV facility based upon each of the facility's availability, facility forecasted yield (in the case of Non-Dispatchable Facilities) and in the most cost-effective manner.

### **2.3.4. Decommissioning Phase**

The lifespan of the proposed thermal generation facility will be at least 20 years from date of commissioning. Equipment associated with this facility would only be decommissioned once it has reached the end of its economic life or if it is no longer required. An upgrade of the thermal generation facility technology could be possible after the initial 20 year operational life should an extension of operational life be required as the gas engines and turbines are common to have longer operational lives than 20 years.

It is most likely that decommissioning activities of the infrastructure of the facility discussed in this EIA process would comprise the disassembly and disposal of the infrastructure. Decommissioning activities will involve disassembly of the production units and ancillary infrastructure, demolishing of buildings, fuel storage tanks and removal of waste from the site and rehabilitation to the desired end-use. A new permitting process will be undertaken to assess the decommissioning phase as per the legislation requirements at the time.

Future use of the site after decommissioning of the thermal generation facility could possibly form part of another energy generating project of an alternative industry that would be able to utilise some of the existing infrastructure associated with the thermal generation facility. This would however be dependent on the development plans of the area at the time.

## **2.4 Findings of the Environmental Impact Assessment (EIA)**

A detailed assessment of the potential impacts that may result from the development of proposed Thermal and upgraded access road associated with the Hyperion Hybrid Facility has been undertaken in the EIA and specialist assessments (**Appendix D – Appendix M** of the EIA report). This chapter concludes the environmental assessment of the thermal plant and associated infrastructure by providing a summary of the results and conclusions of the assessment of the development area. In so doing, it draws on the information gathered as part of the EIA process, the knowledge gained by the environmental specialists and the EAP and presents a combined and informed opinion of the environmental impacts associated with the project.

No environmental fatal flaws were identified in the detailed specialist studies conducted, provided that the recommended mitigation measures are implemented. These measures include, amongst others, the avoidance of highly sensitive features within the project site by the development footprint and the undertaking of monitoring, as specified by the specialists, as well as the operation of the thermal facility as part of a hybrid system together with the PV facilities in order to reduce GHG emissions.

The potential environmental impacts associated with Thermal facility identified and assessed through the EIA process include:

- » Impacts on ecology, flora and fauna.
- » Impacts on avifauna.
- » Impacts on freshwater.
- » Impacts on soils and agricultural potential
- » Impacts on heritage resources, including archaeology and palaeontology.
- » Visual impacts on the area imposed by the components of the facility.
- » Positive and negative socio- economic impacts.
- » Traffic impacts.
- » Impact on air quality and climate change.
- » Impacts associated with unexpected events.

### **Impacts on Ecology**

The Terrestrial Biodiversity Assessment (Appendix D of the EIA) verified the results of previous field and desktop assessments undertaken for the project site (Todd, 2020). The project site has a moderate abundance of *Vachellia erioloba* with a high abundance of *Vachellia haematoxylon*, especially within the southern half of the authorised Hyperion PV1&2 footprint, which are species protected under the National Forest Act. If no mitigation measures are implemented, the impact on floral and faunal habitat, diversity and species of concern is likely to be of medium significance. With mitigation measures in place, the impact significance can be reduced to low significance. The assessment concluded that the loss of habitat from the proposed development will not result in significant impacts on floral and faunal communities given that biodiversity outside of the direct footprint is preserved through strict adherence to mitigation measures, although cumulative habitat loss in the greater region area must be considered.

### **Impacts on Avifauna**

The Avifaunal Assessment (Appendix E of the EIA) verified the results of previous field and desktop assessments undertaken for the project site (Todd, 2019). If no mitigation measures are implemented, the impact on avifaunal habitat, diversity and species of concern is likely to be of medium significance. With mitigation measures in place, the impact significance can be reduced to low significance. In terms of development implications, the loss of habitat from the proposed development will not result in significant impacts on the avifaunal community within the focus and no impacts on a National or Regional scale are anticipated to permeate from the Thermal Plant.

### **Impacts on Freshwater**

The Freshwater Assessment (Appendix F of the EIA) concluded that there are no watercourses within the proposed development footprint. However, 2 watercourses were identified in the surrounding area, namely the Vlermuisleegte River and a perched depression wetland within the project area. Based on the outcome of the impact assessment, the proposed Hyperion hybrid generation facility is not expected to pose a direct negative impact to the identified Vlermuisleegte River and perched depression wetland. This can be attributed to the distance the proposed Hyperion hybrid generation facility (located at least 420 m from the edge of the river and 522 m from the edge of the perched depression wetland) is located from the watercourses. The proposed upgraded access road is located immediately adjacent to the delineated extent of the Vlermuisleegte River. As such, the construction of the road may pose a direct negative impact to the Vlermuisleegte River. It is highly recommended that the width of the road be extended to the western

side of the existing road reserve rather than to the east thereof (if considered technically feasible). This will reduce the impact significance of the proposed access road construction activities on the Vlermuisleegte River. During the operational phase of the access road, if the recommended mitigation measures are implemented, the impacts significance would be low.

### **Impacts on Land Use, Soil and Agricultural Potential**

The Soils and Agricultural Potential Compliance Statement (Appendix G of the EIA) indicated that the Thermal Plant and northern part of the access road consist of land with Low-Moderate land capability. The assessment concluded that the construction and operation of the Thermal plant and upgraded access road will have impacts that range from medium to low. Through the consistent implementation of the recommended mitigation measures, most of impacts can all be reduced to low. Since the area around the plant will be fenced off, it is not anticipated that the impact on livestock farming can be mitigated as this area together with the access road alignment, will now be excluded from livestock farming.

The development is considered to be favorable, providing that the mitigation measures are followed to prevent soil erosion and soil pollution and to minimise impacts on the veld quality of the farm portions that will be affected. The project infrastructure should also remain within the proposed footprint boundaries that will be fenced off and the construction corridor around the access road must be as narrow as possible.

### **Visual Impacts**

The Visual Impact Assessment (Appendix J of the EIA) undertaken determined that the visibility of the proposed engine houses and lower infrastructure is likely to be limited and will be similar to the authorised solar power projects within and adjacent to which the proposed thermal facility is located. The proposed stacks are however likely to be visible over a broader area and could influence the landscape character as experienced by the majority of receptors.

The proposed project will not result in removal of significant areas of vegetation over and above that removed for the authorised solar projects. Vegetation remaining between the project and possible receptors is likely to mean that this removal of vegetation will not be obvious.

At night lighting could make the development obvious in the landscape. This will be seen against the backdrop of other projects in the area. The general area is not a pristine night time landscape as lighting is also likely to be obvious from mining operations as well as the Kathu Airport. However, the area immediately around the project is relatively dark with only homesteads providing isolated low level lighting.

The proposed access road upgrade will result in a degree of vegetation removal. The formalisation of this road will also be obvious from a small number of homesteads.

Identified visual impacts were all assessed as low significance and can be further reduced with implementation for appropriate mitigation measures. From a landscape and visual impact perspective the specialist concluded that the proposed development ought to be authorised.

### ***Impacts on Heritage Resources (archaeological and paleontological)***

The main issue for this project from a heritage perspective will be the potential to intersect archaeological resources during excavations for both the generator and the road (Appendix H of the EIA). The impact significance was determined to be high however, with appropriate mitigation, the impacts can be easily managed and reduced to low significance. Also, a scientific benefit could even be derived with successful description and rescue of heritage materials.

In the paleontological assessment the impact significance without mitigation in terms of local fossil heritage resources is assessed as low (negative). Pending the potential exposure of scientifically important fossil remains before or during the construction phase, no further specialist palaeontological studies or mitigation are recommended.

The specialist study recommended that the proposed generator and access road should be authorised from an archaeological perspective with the implementation of the recommended mitigation measures.

### ***Social Impacts***

The Social Impact Assessment (Appendix K of the EIA) indicated that the proposed Hyperion hybrid thermal dual fuel project will result in several social and socio-economic benefits, including creation of employment and business opportunities during both the construction and operational phase. The project will also contribute to local economic development through socio-economic development contributions. In addition, the development will improve energy security and reduce the carbon footprint associated with energy generation by merging thermal with solar hybrid solutions.

The findings of the assessment also indicates that the potential negative impacts associated with both the construction and operational phase are likely to be Low Negative with mitigation. It was concluded by the specialist that the development of the proposed Hyperion hybrid thermal dual fuel project is supported from a social perspective.

### ***Traffic Impacts***

The Traffic Impact Assessment (Appendix M of the EIA) identified that the main potential traffic impacts will occur during the construction and decommissioning phases where the delivery and decommissioning of the components of the proposed facility will generate significant traffic. The duration of these phases is short term, i.e. the impact of the traffic generated during the construction and decommissioning phases of the proposed facility on the surrounding road network is temporary, and will be low significance with implementation of mitigation measures. The operational phase of the proposed facility, which includes the delivery of LPG to the site, will not add any significant traffic to the road network.

Based on the outcome of the assessment, the impacts associated with the thermal plant and upgraded access road are considered acceptable from a traffic impact perspective with the implementation of the recommended mitigation measures and the specialist concluded that it can therefore be authorised.

### ***Air Quality and Climate Change Impacts***

The Air Quality and Climate Change Assessment (Appendix I of the EIA) assessed baseline air quality at the site for thoracic particulates (with a diameter less than 10 µm – PM10), inhalable particulates (with an aerodynamic diameter less than 2.5 µm – PM2.5), sulfur dioxide (SO<sub>2</sub>) and nitrogen dioxide (NO<sub>2</sub>) using data for the period 2018 to 2020. The impact of the facility was simulated to be below the dust control regulations near the thermal power generation facility, but exceedances of the dust control regulations are likely along the access road used for LPG delivery.

Criteria air pollutants associated with the normal operation of the project were determined to be of medium significance, however, could be reduced to low significance with additional mitigation to along the access road. The greenhouse gas emissions associated with the operation of project was determined to be of medium significance.

From an air quality and climate change perspective, it is the opinion of the specialist that the Thermal Plant be authorised and licensed to operate on condition that all recommendations are implemented.

### ***Assessment of Unexpected Events***

The main risks identified for the Thermal Plant in the Quantitative Risk Assessment (Appendix L of the EIA) due to loss of containment of hazardous components include exposure to, thermal radiation from fires and overpressure from explosions. Most of the surrounding land has not been developed, and thus limited impacts would be experienced from a large release of LPG within these areas. Impacts into the residential areas, recreational areas, hotels, schools, hospitals and other public places would not be expected. Impacts assessed for the LPG installations were determined to be of low significance.

No fatal flaws were identified that would prevent the project proceeding to the detailed engineering phase of the project and the specialist concluded that they would support the project provided that a Major Hazard Installation (MHI) risk assessment is completed prior to construction of the Thermal plant.

### ***Assessment of Cumulative Impacts***

Based on the specialist cumulative assessment and findings (refer to Appendix D to Appendix M and Chapter 9 of the EIA), the development of Thermal plant and upgraded access road and its contribution to the overall impact of all existing and proposed solar energy facilities and other industrial activities within a 30km radius, it can be concluded that cumulative impacts in the area will be of a low to moderate to high significance, depending on the impact being considered. There are however no impacts or risks identified to be considered as unacceptable with the development of Thermal plant and upgraded access road when considered together with other developments within the surrounding area. In addition, no impacts which will result in whole-scale change are expected.

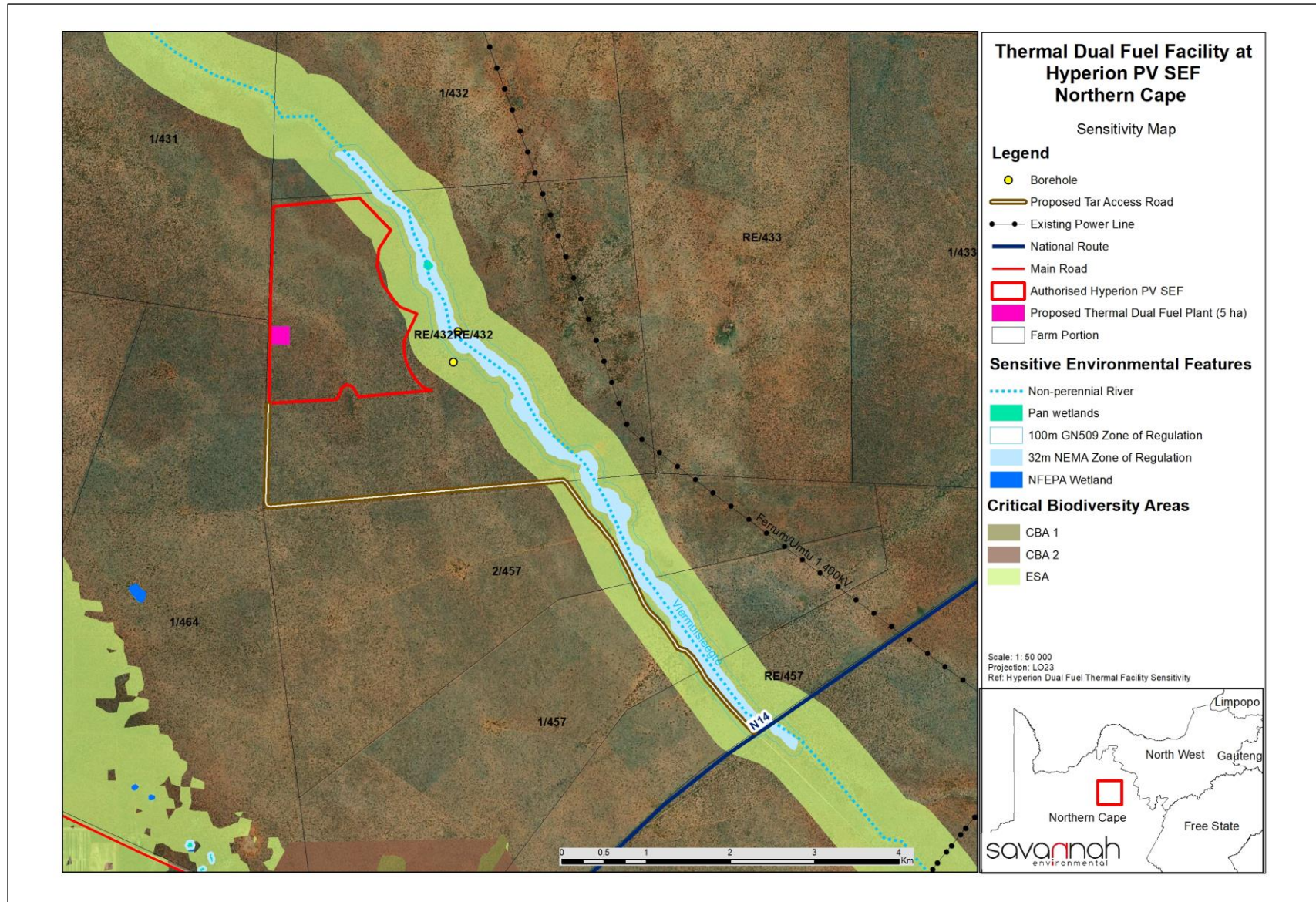
## **2.5 Environmental Sensitivity**

As part of the specialist investigations undertaken within the project site, specific environmental features and areas were identified which will be impacted by the placement of the thermal plant and upgraded access road. The current condition of the features identified (i.e. intact or disturbed) informed the sensitivity of the environmental features and the capacity for disturbance and change associated with the proposed



development. The environmental sensitivity features and areas identified within the grid connection infrastructure are illustrated in Figure 10.1. The sensitive features identified specifically relate to ecology and freshwater resources, and are detailed below:

- » The proposed upgraded access road is located within an ESA along the Vlermuisleegte River. Protected tree species *V. erioloba* trees *V. erioloba* occur within the development site.
- » The Vlermuisleegte River is considered to be largely natural according to the Present Ecological State (PES), and is classified as moderately modified (Class C). A 32m Zone of Regulation buffer has been placed around the river.



**Figure 2.4:** Environmental sensitivity map of the project site overlain by the layout assessed for Thermal Plant and upgraded access road

## CHAPTER 3 : PURPOSE AND OBJECTIVES OF THE EMPr

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An Environmental Management Programme (EMPr) is defined as “an environmental management tool used to ensure that undue or reasonably avoidable adverse impacts of the construction, operation and decommissioning of a project are prevented 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 help 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 (site clearing and site establishment) through to those incurred during the construction activities themselves (erosion, noise, dust) to those incurred during site rehabilitation (soil stabilisation, re-vegetation) and operation. The EMPr also defines monitoring requirements in order to ensure that the specified objectives are met.

This EMPr is applicable to all employees and contractors working on the pre-construction, construction, and operation and maintenance phases of the Thermal plant and upgraded access road. The document must be adhered to and updated as relevant throughout the project life cycle.

This EMPr has been compiled in accordance with Appendix 4 of the EIA Regulations, 2014 (as amended) (refer to Table 4.1). This is a dynamic document and will be further developed in terms of specific requirements listed in any authorisations issued for Thermal plant and upgraded access road and/or as the project develops. This will ensure that the construction and operation activities are planned and implemented taking sensitive environmental features into account. 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).

The EMPr has the following objectives:

- » Outline mitigation measures and environmental specifications which are required to be implemented for the planning, construction, rehabilitation and operation phases of the project in order to minimise the extent of environmental impacts, and to manage environmental impacts associated with the Thermal Plant and upgraded access road
- » Ensure that the construction and operation phases do not result in undue or reasonably avoidable adverse environmental impacts, and ensure that any potential environmental benefits are enhanced.
- » Identify entities who will be responsible for the implementation of the measures and outline functions and responsibilities.
- » Propose mechanisms and frequency for monitoring compliance, and prevent long-term or permanent environmental degradation.
- » Facilitate appropriate and proactive responses to unforeseen events or changes in project implementation that were not considered in the EIA process.

The mitigation measures identified within the EIA process are systematically addressed in the EMPr, ensuring the minimisation of adverse environmental impacts to an acceptable level.

The Developer must ensure that the implementation of the project complies with the requirements of all environmental authorisations, permits, and obligations emanating from relevant environmental legislation. This obligation is partly met through the development and the implementation of this EMPr, and through its integration into the relevant contract documentation provided to parties responsible for construction and/or operation activities on the site. Since this EMPr is part of the EIA process for the Thermal Plant and upgraded access road it is important that this document be read in conjunction with the 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 planning, 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 and updated as relevant throughout the project life cycle.



## CHAPTER 4: STRUCTURE OF THIS EMPr

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

- » Planning and design activities;
- » Construction activities;
- » Operation activities; and
- » Decommissioning activities.

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

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

<b>Project Component/s</b>	List of project components affecting the objective, i.e.: » Thermal Plant » Access road; and » Associated infrastructure.
<b>Potential Impact</b>	Brief description of potential environmental impact if objective is not met.
<b>Activity/Risk Source</b>	Description of activities which could affect achieving the objective.
<b>Mitigation: Target/Objective</b>	Description of the target and/or desired outcomes of mitigation.

<b>Mitigation: Action/Control</b>	<b>Responsibility</b>	<b>Timeframe</b>
List specific action(s) required to meet the mitigation target/objective described above.	Who is responsible for the measures	Time periods for implementation of measures

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

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

- » Planned activities change (i.e. in terms of the components and/or layout of the facility);
- » Modification to or addition to environmental objectives and targets;
- » Additional or unforeseen environmental impacts are identified and additional measures are required to be included in the EMPr to prevent deterioration or further deterioration of the environment.
- » 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.

#### 4.1 Contents of this Environmental Management Programme (EMPr)

This Environmental Management Programme (EMPr) has been prepared as part of the EIA process being conducted in support of the application for Environmental Authorisation (EA) for the Thermal Plant and upgraded access road. This EMPr has been prepared in accordance with DEFF's requirements as contained in Appendix 4 of the 2014 EIA Regulations (GNR 326), and within the Acceptance of Scoping dated 06 January 2021. It provides recommended management and mitigation measures with which to minimise impacts and enhance benefits associated with the project.

An overview of the contents of this EMPr, as prescribed by Appendix 4 of the 2014 EIA Regulations (GNR 326), and where the corresponding information can be found within this EMPr is provided in Table 4.1.

**Table 4.1:** Summary of where the requirements of Appendix 4 of the 2014 NEMA EIA Regulations (GNR 326) are provided in this EMPr.

Requirement	Location in this EMPr
(1) An EMPr must comply with section 24N of the Act and include –	
(a) Details of –	Chapter 4 Appendix K
(i) The EAP who prepared the EMPr.	
(ii) The expertise of that EAP to prepare an EMPr, including a curriculum vitae.	
(b) A detailed description of the aspects of the activity that are covered by the EMPr as identified by the project description.	Chapter 2
(c) A map at an appropriate scale which superimposes the proposed activity, its associated structures, and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffers.	Chapter 2 Figure 2.2 to Figure 2.5 Appendix A
(d) A description of the impact management outcomes, including management statements, identifying the impacts and risks that need to be avoided, managed and mitigated as identified through the environmental impact assessment process for all phases of the development including –	
(i) Planning and design.	Chapter 5
(ii) Pre-construction activities.	Chapter 5
(iii) Construction activities.	Chapter 6
(iv) Rehabilitation of the environment after construction and where applicable post closure.	Chapter 7
(v) Where relevant, operation activities.	Chapter 8
(f) A description of proposed impact management actions, identifying the manner in which the impact management outcomes contemplated in paragraph (d) will be achieved, and must, where applicable, include actions to –	
(i) Avoid, modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation.	Chapters 5 - 8
(ii) Comply with any prescribed environmental management standards or practices.	

Requirement	Location in this EMPr
(iii) Comply with any applicable provisions of the Act regarding closure, where applicable. (iv) Comply with any provisions of the Act regarding financial provision for rehabilitation, where applicable.	
(g) The method of monitoring the implementation of the impact management actions contemplated in paragraph (f).	Chapters 5 - 8
(h) The frequency of monitoring the implementation of the impact management actions contemplated in paragraph (f).	Chapters 5 - 8
(i) An indication of the persons who will be responsible for the implementation of the impact management actions.	Chapters 5 - 8
(j) The time periods within which the impact management actions contemplated in paragraph (f) must be implemented.	Chapters 5 - 8
(k) The mechanism for monitoring compliance with the impact management actions contemplated in paragraph (f).	Chapters 5 - 8
(l) A program for reporting on compliance, taking into account the requirements as prescribed by the Regulations.	Chapter 6
(m) An environmental awareness plan describing the manner in which – (i) The applicant intends to inform his or her employees of any environmental risk which may result from their work. (ii) Risks must be dealt with in order to avoid pollution or the degradation of the environment.	Chapter 6
(n) Any specific information that may be required by the competent authority.	Table 4.2
(2) Where a government notice gazetted by the Minister provides for a generic EMPr, such generic EMPr as indicated in such notice will apply.	N/A

An overview of the contents of this EMPr, as prescribed by DEFF's Acceptance of Scoping dated 06 January 2021, and where the corresponding information can be found within this EMPr is provided in Table 4.2.

**Table 4.2:** Summary of where the requirements prescribed by DEA's Acceptance of Scoping are provided in the EMPr

DEFF requirement for EIA	Response / Section in this EIA Report
<b>(a) Listed Activities</b> (i) Please ensure that all relevant listed activities are applied for, are specific and that it can be linked to the development activity or infrastructure as described in the project description.	All relevant activities applied for in the application for Environmental Authorisation and included in the EIA Report are relevant to the Thermal Plant and can be linked to the development activity or infrastructure in the project description.
(ii) If the activities applied for in the application form differ from those mentioned in the final SR, an amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link <a href="https://www.environment.gov.za/documents/forms">https://www.environment.gov.za/documents/forms</a> .	An additional listed activity has been included for the project due to the identified preferred access road being determined as that authorised for the Hyperion PV facilities. Therefore, an amended application form has been submitted with the EIA report.
(iii) The EIAR must provide an assessment of the impacts and mitigation measures for each of the listed activities applied for.	An assessment of impacts and recommended mitigation measures are included in Chapter 8 of this report.
<b>(b) Public Participation</b> i. Please ensure that comments from all relevant stakeholders are submitted to the Department with the	All comments received to date have been included within this Comments and Responses Report. Where comments have not been obtained, proof that attempts

DEFF requirement for EIA	Response / Section in this EIA Report
<p>EIAr. This includes but is not limited to the Northern Cape Department of Environment and Nature Conservation, the provincial Department of Agriculture, the Provincial Department of Transport, the local and district Municipality, the Department of Water and Sanitation (DWS), the South African Heritage Resources Agency (SAHRA), the Department of Rural Development and Land Reform (DRDLR), and the Department of Environment, Forestry and Fisheries: Climate Change; Oceans and Coast, Biodiversity and Protected Areas Directorates.</p>	<p>were made to obtain comments have been included in <b>Appendix C4</b> (Organs of State correspondence) and <b>Appendix C5</b> (stakeholder correspondence). A distribution list for the EIA Report has been drafted and will be updated with the waybill numbers and the proof of follow-up for written comments. This document will be included in <b>Appendix C5</b> in the final EIA Report.</p> <p>The database detailing registered I&amp;APs is included as <b>Appendix C1</b> in the EIA Report.</p>
<p>ii. Please ensure that all issues raised and comments received during the circulation of the draft SR from registered I&amp;APs and organs of state (including this Department's Climate Change; Oceans and Coast, Biodiversity and Protected Areas Directorates), which have jurisdiction in respect of the proposed activity are adequately addressed in the EIAr.</p>	<p>All comments received during the Scoping phase (included in <b>Appendix C6</b> and <b>Appendix C8</b>) have been addressed throughout this EIA report.</p>
<p>iii. Proof of correspondence with the various stakeholders must be included in the draft EIAr. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments,</p>	<p>All correspondence with stakeholders is included in <b>Appendix C3</b> and <b>Appendix C4</b> of this EIA report.</p>
<p>iv. The Public Participation Process must be conducted in terms of Regulation 39, 40 41, 42, 43 &amp; 44 of the EIA Regulations 2014, as amended</p>	<p>The Public Participation Process has been conducted in terms of Regulation 39, 40, 41, 42, 43 &amp; 44 of the EIA Regulations 2014, as amended (GNR 326), as well as in accordance with the approved Public Participation Plan. The approved Public Participation Plan is included as <b>Appendix C9</b> of the final Scoping Report.</p> <p>I&amp;APs and Organs of State were notified of the Acceptance of Scoping and the commencement of the EIA Phase on 27 January 2021. I&amp;APs and Organs of State were notified of the availability of the EIA Report for review and comment for a 30-day period from <b>Friday 12 February 2021</b> until <b>Monday 15 February 2021</b> as follows:</p> <ul style="list-style-type: none"> <li>» an advertisement was placed in the Kathu Gazette on 12 February 2021 (tearsheet to be included in <b>Appendix C2</b> of the final EIA Report).</li> <li>» a notification letter was distributed to all registered I&amp;APs on the project database, including the Organs of State Officials. Proof of notifications are included in <b>Appendices C4</b> and <b>C5</b> and included in the EIA Report.</li> <li>» All registered I&amp;APs and Organs of State Officials will receive reminder notifications regarding the nearing of the end of the review and comment period of the EIA Report (proof to be included in <b>Appendices C4</b> and <b>C5</b> and included in the final EIA Report</li> </ul>



DEFF requirement for EIA	Response / Section in this EIA Report
v. The EIAR must provide evidence that all identified and relevant competent authorities have been given an opportunity to comment on the proposed development particularly, the Northern Cape Department of Environment and Nature Conservation, and the District and Local Municipalities	All correspondence to competent authorities and commenting authorities during the EIA process will be included in <b>Appendix C4</b> and <b>C5</b> and included in the final EIA Report.
vi. A Comments and Response trail report (C&R) must be submitted with the final EIAR. The C&R report must incorporate all comments for this development. The C&R report must be a separate document from the main report and the format must be in the table format as indicated in Appendix 1 of this letter. Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as "noted" is not regarded as an adequate response to I&APs' comments.	All comments received during the EIA process, including those of the DEFF, will be included within the Comments and Responses Report (included as <b>Appendix C8</b> of the final EIA Report).
<b><u>c) Layout &amp; Sensitivity Maps</u></b>	
(i) The EIAR must provide coordinate points for the proposed development site (note that if the site has numerous bend points, at each bend point coordinates must be provided) as well as the start, middle and end point of all linear activities.	A detailed Layout Map indicating coordinates of proposed infrastructure is included in <b>Appendix Q</b>
(ii) Please provide a layout map which indicates the following: <ul style="list-style-type: none"> <li>a) Positions of the power island, turbine and generator, fuel storage tanks, water storage reservoir and tanks, water and gas supply pipelines;</li> <li>b) Permanent laydown area footprint;</li> <li>c) All supporting onsite infrastructure e.g. roads (existing and proposed);</li> <li>d) Substation(s) and/or transformer(s) sites including their entire footprint;</li> <li>e) Connection routes (including pylon positions) to the distribution/transmission network; and</li> <li>f) All existing infrastructure on the site.</li> </ul>	A detailed Layout Map indicating all proposed infrastructure is included in <b>Appendix Q</b>
(iii) Please provide an environmental sensitivity map which indicates the following: <ul style="list-style-type: none"> <li>a) The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected;</li> <li>b) Buffer areas; and,</li> <li>c) All "no-go" areas.</li> </ul>	An Environmental Sensitivity Map indicating all environmentally sensitive features is included in <b>Appendix Q</b>
(iv) The above layout map must be overlain with the sensitivity map and a cumulative map which shows neighbouring energy developments and existing grid infrastructure	A combined Layout and Environmental Sensitivity Map indicating all environmentally sensitive features and proposed infrastructure is included in <b>Appendix Q</b>
<b><u>(d) Specialist assessments</u></b>	
i. Specialist studies to be conducted must provide a detailed description of their methodology, as well as	The methodologies and assessments undertaken by specialist are detailed in the relevant specialist studies ( <b>Appendix D to Appendix M</b> )

DEFF requirement for EIA	Response / Section in this EIA Report
indicate the locations and descriptions of infrastructure positions, and all other associated infrastructures that they have assessed and are recommending for authorisation,	
ii. The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season and providing that as a limitation, will not be accepted.	The limitations and assumptions of specialist are detailed in the relevant specialist studies ( <b>Appendix D</b> to <b>Appendix M</b> )
iii. Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons and where necessary, include further expert advice.	Chapter 10 of this EIA Report contains a summary of recommendations and conclusions made by specialists. No contradicting recommendations have been made.
<b><u>(e) Cumulative Assessment</u></b>	
(i) If there are other similar facilities proposed within a 30km radius of the proposed development site, a cumulative impact assessment must be conducted for all identified and assessed impacts which must be refined to indicate the following:	A Cumulative Map indicating all relevant developments within 30km of the proposed project is included in <b>Appendix Q</b>
a) Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land.	Chapter 9 of this EIA report contains an assessment of cumulative impacts associated with the Hyperion Thermal Plant.
b) Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.	Chapter 9 of this EIA report and the relevant specialist report ( <b>Appendix D</b> to <b>Appendix M</b> ) contain an assessment of cumulative impacts associated with the Hyperion Thermal Plant.
c) The cumulative impacts significance rating must also inform the need and desirability of the proposed development.	A conclusion and recommendation regarding cumulative impact are included in Chapter 10 of this EIA Report. This has informed the need and desirability for the project detailed in Chapter 5.
d) A cumulative impact environmental statement on whether the proposed development must proceed.	A cumulative impact environmental statement on whether the proposed development must proceed is included in Chapter 10.
<b><u>(f) General</u></b>	
(i) The Air Quality and Climate Change specialist studies' terms of reference (TORs) must be made available to this Department's Climate Change Directorate for comments. Proof of correspondence must be included in the public participation report.	The Draft Scoping Report including the Plan of Study, and all specialist studies have been submitted to the Climate Change Directorate for comment. Proof of submission is included in <b>Appendix C5</b> . No comments were received at the date of submission of the final Scoping report.

## 4.2 Project Team

In accordance with Regulation 12 of the 2014 EIA Regulations (GNR 326) the applicant appointed Savannah Environmental (Pty) Ltd as the independent environmental consultants responsible for managing the application for EA and the supporting EIA process. The application for EA and the EIA process, is being managed in accordance with the requirements of NEMA, the 2014 EIA Regulations (GNR 326), and all other relevant applicable legislation.

### 4.2.1 Details and Expertise of the Environmental Assessment Practitioner (EAP)

Savannah Environmental is a leading provider of integrated environmental and social consulting, advisory and management services with considerable experience in the fields of environmental assessment and management. The company is wholly woman-owned (51% black woman-owned), and is rated as a Level 2 Broad-based Black Economic Empowerment (B-BBEE) Contributor. Savannah Environmental's team have been actively involved in undertaking environmental studies over the past 13 years, for a wide variety of projects throughout South Africa, including those associated with electricity generation and infrastructure development.

This EIA process is being managed by Jo-Anne Thomas. She is supported by Jana de Jager and Nicolene Venter.

- » **Jo-Anne Thomas.** She holds a Master of Science Degree in Botany (M.S.c Botany) from the University of the Witwatersrand and is registered as a Professional Natural Scientist (400024/2000) with SACNASP and a registered Environmental Assessment Practitioner (EAP) with EAPASA (2019/726). She has over 20 years of experience in the field of environmental assessment and management, and the management of large environmental assessment and management projects. During this time, she has managed and coordinated a multitude of large-scale infrastructure EIAs and is also well versed in the management and leadership of teams of specialist consultants, and dynamic stakeholders. She has been responsible for providing technical input for projects in the environmental management field, specialising in Strategic Environmental Advice, EIA studies, environmental permitting, public participation, EMPs and EMPs, environmental policy, strategy and guideline formulation, and integrated environmental management (IEM). Her responsibilities for environmental studies include project management, review and integration of specialist studies, identification and assessment of potential negative environmental impacts and benefits, and the identification of mitigation measures, and compilation of reports in accordance with applicable environmental legislation.
- » **Jana de Jager.** She holds a bachelor's degree in Environmental Science, an Honours degree in Geography & Environmental Science and is currently undertaking her M.S.c in Ecological Water Requirements. She has 3 years of experience in the environmental management field. Her key focus is on undertaking environmental impact assessments, GIS mapping, public participation, environmental management plans and programmes. She is registered as a Candidate Natural Scientist with the South African Council for Natural Scientific Professions (SACNASP).
- » **Nicolene Venter.** She is a Board Member of IAPSA (International Association for Public Participation South Africa). She holds a Higher Secretarial Diploma and has over 21 years of experience in public participation, stakeholder engagement, awareness creation processes and facilitation of various meetings (focus group, public meetings, workshops, etc.). She is responsible for project management of

public participation processes for a wide range of environmental projects across South Africa and neighbouring countries.

Savannah Environmental's team have been actively involved in undertaking environmental studies over the past 15 years, for a wide variety of projects throughout South Africa, including those associated with electricity generation and infrastructure development, and therefore have extensive knowledge and experience in EIAs and environmental management, having managed and drafted EMPs for numerous other power generation projects throughout South Africa. Curricula Vitae (CVs) detailing the Savannah Environmental team's expertise and relevant experience are provided in **Appendix K** of the EMP.

#### 4.2.2 Details of the Specialist Consultants

A number of independent specialist consultants have been appointed as part of the EIA project team in order to adequately identify and assess potential impacts associated with the project (refer to **Table 1.1**). The specialist consultants have provided input into the EIA Report as well as this EMP.

**Table 0.1: Specialist Consultants which form part of the EIA project team.**

Specialist Area of Expertise	Specialist Company	Specialists Names
Ecology and Avifauna	Scientific Terrestrial Services	Chris Hooton
Watercourses	Scientific Aquatic Services	Stephen van Staden Christel du Preez
Visual Impact Assessment	Environmental Planning and Design	Jon Marshall
Soils and Agricultural Potential Impact Assessment	TerraAfrica	Mariné Pienaar
Heritage (Archaeology and Palaeontology)	Asha Consulting (in consultation with John Almond of Natura Viva)	Jayson Orton
Social Impact Assessment	Tony Barbour	Tony Barbour
Traffic Impact Assessment	JG Afrika	Adrian Johnson
Air Quality and Climate Change	AirShed	Terri Bird
Quantitative Risk Assessment	RISCOM	Mike Oberholzer

## CHAPTER 5: PLANNING AND DESIGN MANAGEMENT PROGRAMME

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

- » Ensures that the preferred design and layout of the Thermal plant and associated infrastructure, and upgraded access road 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 (underground cable network, short distribution power line), including the access roads.
- » Enables the construction activities to be undertaken without significant disruption to other land uses and activities in the area.

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

### 5.1 Objectives

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

The main sensitive feature of the project site is the Vlermuisleegte River which is adjacent to the project site. A perched depression wetland has been identified within the northern portion of the project site, situated within the Vlermuisleegte River. The Thermal plant is not expected to pose direct negative impacts to these features. The proposed upgraded access road is located immediately adjacent to the delineated extent of the Vlermuisleegte River. As such, the construction of the road may pose an indirect negative impact to the Vlermuisleegte River however, with the implementation of mitigation measures impacts may be reduced.

<b>Project Component/s</b>	<ul style="list-style-type: none"> <li>» Upgraded access road</li> <li>» Thermal facility</li> <li>» Associated infrastructure</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Impact on identified sensitive areas.</li> <li>» Design fails to respond optimally to the environmental considerations.</li> </ul>
<b>Activities/Risk Sources</b>	<ul style="list-style-type: none"> <li>» Positioning of all project components</li> <li>» Pre-construction activities, e.g. geotechnical investigations, site surveys and environmental walk-through surveys.</li> <li>» Positioning of temporary sites.</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» Avoidance of direct impact on water features through appropriate design of the access road.</li> <li>» Optimal planning of infrastructure to minimise visual impact.</li> <li>» Site sensitivities are taken into consideration and avoided as far as possible, thereby mitigating potential impacts.</li> </ul>

<b>Mitigation: Action/Control</b>	<b>Responsibility</b>	<b>Timeframe</b>
Plan and conduct pre-construction activities in an environmentally acceptable manner.	Developer Contractor	Pre-construction
Undertake a detailed geotechnical pre-construction survey.	Developer Geotechnical specialist	Pre-construction
The EMPr should form part of the contract with the Contractors appointed to construct the thermal plant and associated infrastructure, and must be used to ensure compliance with environmental specifications and management measures. The implementation of this EMPr for all life cycle phases of the project is considered to be key in achieving the appropriate environmental management standards as detailed for this project.	Developer Contractor	Tender Design and Design Review Stage
Plan the placement of laydown areas and temporary construction equipment camps in order to minimise vegetation clearing (i.e. in already disturbed areas) wherever possible and to avoid habitat loss and disturbance to adjoining areas.	Developer	Pre-construction
The construction equipment camps must be planned as close to the site as possible to minimise impacts on the environment.	Developer	Pre-construction
Ensure that laydown areas, construction camps and other temporary use areas are located in areas of low sensitivity and are properly fenced or demarcated as appropriate and practically possible.	Developer	Project planning
Plan development levels to minimise earthworks to ensure that levels are not elevated.	Developer	Project planning
Clear rules and regulations for access to the proposed site must be developed.	Developer Contractor	Pre-Construction
Access roads and entrances to the site should be carefully planned to limit any intrusion on the neighbouring property owners and road users.	Developer	Planning and design
The upgraded T26 road must be utilised as the main access to the site.	Developer Contractor	Design
The width of the road be extended to the western side of the existing road reserve rather than to the east thereof as far as technically feasible.	Developer	Design
Plan and placement of light fixtures for the plant and the ancillary infrastructure in such a manner so as to minimise glare and impacts on the surrounding area.	Developer Contractor	Planning
Where discharge of rainwater on roads will be channelled directly into the natural environment, the application of diffuse flow measures must be included in the design.	Developer Contractor	Planning
New elements should be designed to blend as naturally as possible with their backdrop.	Developer Design engineer	Design and planning
Plan to maintain the height of structures as low as possible.	Developer Design engineer	Design and planning
Minimise disturbance of the surrounding landscape and maintain existing vegetation around the development	Developer Design engineer	Design and planning
Reduce the construction period as far as possible through careful planning and productive implementation of resources.	Developer Contractor	Pre-construction

Mitigation: Action/Control	Responsibility	Timeframe
No temporary site camps must be planned outside the development footprint of the project.	Developer	Design and planning
Consider planning and design level mitigation measures recommended by the specialists as part of the EIA process.	Engineering Design Consultant	Design Phase

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» The design meets the objectives and does not degrade the environment.</li> <li>» Demarcated sensitive areas are avoided at all times.</li> <li>» Design and layouts respond to the mitigation measures and recommendations in the EIA Report.</li> </ul>
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>» Review of the design by the Project Manager and the Environmental Control Officer (ECO) prior to the commencement of construction.</li> <li>» Monitor ongoing compliance with the FMP and method statements.</li> </ul>

**OBJECTIVE 2: Ensure that relevant permits and plans are in place to manage impacts on the environment**

<b>Project Component/s</b>	<ul style="list-style-type: none"> <li>» Thermal Plant</li> <li>» Access road</li> <li>» Associated buildings.</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Impact on identified sensitive areas and protected species.</li> <li>» Design fails to respond optimally to the environmental considerations.</li> </ul>
<b>Activities/Risk Sources</b>	<ul style="list-style-type: none"> <li>» Positioning of all project components</li> <li>» Pre-construction activities, e.g. geotechnical investigations, site surveys thermal plant and upgraded access road.</li> <li>» Positioning of temporary sites.</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» To ensure that the design of the power plant responds to the identified environmental constraints and opportunities.</li> <li>» To ensure that pre-construction activities are undertaken in an environmentally friendly manner.</li> <li>» To ensure that the design of the power plant responds to the identified constraints identified through pre-construction surveys.</li> </ul>

Mitigation: Action/Control	Responsibility	Timeframe
Obtain any additional environmental permits required prior to the commencement of construction. Copies of permits/licenses must be submitted to the Director: Environmental Impact Evaluation at the DEFF.	Developer	Pre-construction
Obtain abnormal load permits for transportation of project components to site (if required).	Contractor(s)	Prior to construction
An ecological pre-construction walkthrough of the final development footprint (thermal plant and access road) must be undertaken prior to the commencement of the construction phase in order to locate species of conservation concern (flora and fauna) that would be affected and that can be translocated.	Developer Specialist	Pre-construction



Mitigation: Action/Control	Responsibility	Timeframe
Results of the walk through survey must be used to apply for the relevant permits from DEFF and DAEARD&LR		
Affected individuals of selected protected species (i.e. those that are of high conservation value or which have a high probability of surviving translocation) which cannot be avoided should be translocated to a safe area on the site prior to construction. This does not include woody species which cannot be translocated and where these are protected by DEFF and permit for their destruction would be required.	Developer Contractor Specialist	Pre-construction
Test excavations and sampling of artefacts to be carried out prior to development (Thermal Plant and upgraded access road).	Archaeologist	6 months before construction.
A chance find procedure must be developed and implemented in the event that archaeological or palaeontological resources are found.	Developer Contractor	Pre-construction
Prepare a detailed Fire Management Plan (FMP) in collaboration with surrounding landowners.	Developer	Pre-construction
Communicate the FMP to surrounding landowners and maintain records thereof.	Developer	Pre-construction Construction
A Stormwater Management Plan (SWMP) should be developed and should provide for a drainage system sufficiently designed to prevent water run-off from the thermal plant to cause soil erosion.	Developer Design engineer	Pre-construction
Develop and implement an alien, invasives and weeds eradication/control plan.	Developer Specialist	Pre-construction
Compile and implement a construction period traffic management plan 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.	Contractor	Pre-construction

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» Permits are obtained and relevant conditions complied with.</li> <li>» Impact on protected plant species reduced to some degree through Search and Rescue.</li> <li>» Relevant management plans and Method Statements prepared and implemented.</li> </ul>
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>» Review of the design by the Project Manager and the Environmental Control Officer (ECO) prior to the commencement of construction.</li> <li>» Monitor ongoing compliance with the EMP and method statements.</li> </ul>

#### **OBJECTIVE 4: Ensure appropriate planning is undertaken by contractors**

<b>Project Component/s</b>	<ul style="list-style-type: none"> <li>» Thermal plant</li> <li>» Access road</li> <li>» Associated buildings</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Impact on identified sensitive areas.</li> <li>» Design and planning fail to respond optimally to the environmental considerations.</li> </ul>
<b>Activities/Risk Sources</b>	<ul style="list-style-type: none"> <li>» Positioning of all project components</li> </ul>



	<ul style="list-style-type: none"> <li>» Pre-construction activities.</li> <li>» Positioning of temporary sites.</li> <li>» Employment and procurement procedures.</li> </ul>
<b>Mitigation: Target/Objective</b>	» To ensure that pre-construction activities are undertaken in an environmentally friendly manner.

<b>Mitigation: Action/Control</b>	<b>Responsibility</b>	<b>Timeframe</b>
The terms of this EMPr and the Environmental Authorisation must be included in all tender documentation and Contractors contracts.	Developer Contractor	Pre-construction
Completion of an emergency preparedness and response document for on-site and off-site scenarios prior to initiating the MHI risk assessment (with input from local authorities)	Developer Contractor	Pre-Construction
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.	Developer	Pre-construction
Pre-construction environmental induction for all construction staff on site must be provided to ensure that basic environmental principles are adhered to. This includes awareness of no littering, appropriate handling of pollution and chemical spills, avoiding fire hazards, minimising wildlife interactions, remaining within demarcated construction areas etc.	EO	Pre-construction
A local procurement policy must be adopted to maximise the benefit to the local economy.	Developer Contractor	Pre-construction
Recruitment of temporary workers onsite is not to be permitted. A recruitment office with a Community Liaison Officer should be established to deal with jobseekers.	Developer Contractor	Pre-Construction
Set up a labour desk in a secure and suitable area to discourage the gathering of people at the construction site.	Developer Contractor	Pre-Construction
Local community organisations and policing forums must be informed of construction times and the duration of the construction phase. Procedures for the control and removal of loiterers at the construction site should be established.	Developer Contractor	Pre-Construction
Security company must be appointed and appropriate security procedures implemented.	Developer Contractor	Pre-Construction
A comprehensive employee induction programme must be developed and utilised to cover land access protocols, fire management and road safety.	Contractor	Pre-construction
Changes in ground level may not infringe statutory ground to conductor clearances or statutory visibility clearances. After any changes in ground level, the surface shall be rehabilitated and stabilised so as to prevent erosion. The measures taken shall be to Eskom's satisfaction.	Contractor	Pre-construction
No mechanical equipment, including mechanical excavators or high lifting machinery, shall be used in the vicinity of Eskom's apparatus and/or services, without prior written permission having	Contractor	Pre-construction

Mitigation: Action/Control	Responsibility	Timeframe
<p>been granted by Eskom. If such permission is granted the developer must give at least seven working days' notice prior to the commencement of work. This allows time for arrangements to be made for supervision and/or precautionary instructions to be issued by the relevant Eskom Manager.</p> <p>Note: Where an electrical outage is required, at least fourteen work days are required to arrange it.</p>		
<p>The use of explosives of any type within 500 metres of Eskom's services shall only occur with Eskom's previous written permission. If such permission is granted the developer must give at least fourteen working days prior notice of the commencement of blasting. This allows time for arrangements to be made for supervision and/or precautionary instructions to be issued in terms of the blasting process. It is advisable to make application separately in this regard.</p>	Contractor	Pre-construction
<p>Perform a skills audit to determine the potential skills that could be sourced in the area</p>	Developer Contractor	Pre-construction

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» Conditions of the EMPr form part of all contracts.</li> <li>» Local employment and procurement is encouraged.</li> </ul>
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>» Monitor ongoing compliance with the EMP and method statements.</li> </ul>

### **OBJECTIVE 5: Ensure effective communication mechanisms**

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

<b>Project component/s</b>	<ul style="list-style-type: none"> <li>» Thermal plant.</li> <li>» Access road.</li> <li>» Associated infrastructure.</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Impacts on affected and surrounding landowners and land uses</li> </ul>
<b>Activity/risk source</b>	<ul style="list-style-type: none"> <li>» Activities associated with construction</li> <li>» Activities associated with operation</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» Effective communication with affected and surrounding landowners, and communities.</li> <li>» Addressing of any issues and concerns raised as far as possible in as short a timeframe as possible.</li> </ul>

Mitigation: Action/control	Responsibility	Timeframe
<p>Compile and implement a grievance mechanism procedure for the public to be implemented during both the construction and operation phases of the facility. This procedure should include details of the contact person who will be receiving</p>	Developer Contractor O&M Contractor	Pre-construction (construction procedure) Pre-operation (operation procedure)

Mitigation: Action/control	Responsibility	Timeframe
issues raised by interested and affected parties, and the process that will be followed to address issues.		
Develop and implement a grievance mechanism for the construction, operation 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.	Developer Contractor O&M Contractor	Pre-construction (construction procedure) Pre-operation (operation procedure)
Liaison with landowners must be undertaken prior to the commencement of construction in order to provide sufficient time for them to plan agricultural activities.	Developer Contractor	Pre-construction
Organise local community meetings to advise the local labour on the project that is planned to be established and the jobs that can potentially be applied for.	Contractor	Pre-construction
Before construction commences, representatives from the local municipality, community leaders, community-based organisations and the surrounding property owners (of the larger area), must be informed of the details of the contractors, size of the workforce and construction schedules.	Developer Contractor	Pre-construction and construction
Clearly inform the local municipality of the potential impact of the proposed project in order for the necessary preparations to take place	Developer	Pre-construction

<b>Performance Indicator</b>	» Effective communication procedures in place.
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>» A Public Complaints register must be maintained, by the Contractor to record all complaints and queries relating to the project and the action taken to resolve the issue.</li> <li>» All correspondence should be in writing.</li> <li>» Developer and contractor must keep a record of local recruitments and information on local labour; to be shared with the ECO for reporting purposes during construction.</li> </ul>

## CHAPTER 6: MANAGEMENT PROGRAMME: CONSTRUCTION

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

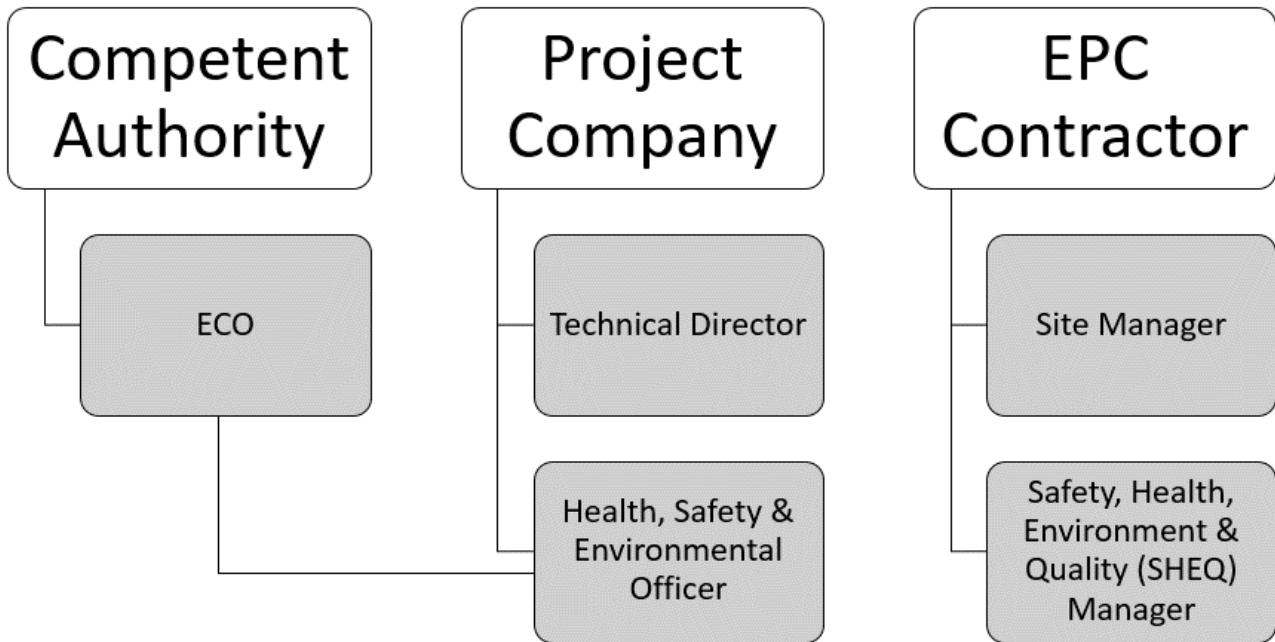
- » Ensures that construction activities are appropriately managed in respect of environmental aspects and impacts.
- » Enables construction activities to be undertaken without significant disruption to other land uses and activities in the area, in particular concerning noise impacts, farming practices,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

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

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

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

Formal responsibilities are necessary to ensure that key procedures are executed. Specific responsibilities of the Technical Director/Manager, Site Manager, Internal Environmental Officer, Safety and Health Representative, Independent 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 6.1** provides an organogram indicating the organisational structure for the implementation of the EMPr.



**Figure 6.4:** Organisational structure for the implementation of the EMPr

**Construction Manager** will:

- » Ensure all specifications and legal constraints specifically with regards to the environment are highlighted to the Contractor(s) so that they are aware of these.
- » Ensure that the Developer 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 through input from the independent ECO.
- » Be fully conversant with the EIA for the project, the EMPr, the conditions of the Environmental Authorisation, and all relevant environmental legislation.
- » Be fully knowledgeable with the contents of all relevant licences and permits.

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

- » Be fully knowledgeable with the contents of the EIA.
- » Be fully knowledgeable with the contents and conditions of the Environmental Authorisation.
- » 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 Technical Director, the ECO, the Internal Environmental Officer 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 the project proponent prior to the commencement of any authorised activities and will be responsible for monitoring, reviewing and verifying compliance by the Contractor with the environmental specifications of the EMPr and the conditions of the Environmental Authorisation. Accordingly, the ECO will:

- » Be fully knowledgeable of the contents of the EIA.
- » Be fully knowledgeable of the contents of the conditions of the EA (once issued).
- » Be fully knowledgeable of the contents of the EMPr.
- » Be fully knowledgeable of the contents of all relevant environmental legislation, and ensure compliance therewith.
- » Be fully knowledgeable with the contents of all relevant licences and permits issued for the project.
- » Ensure that the contents of the EMPr are communicated to the Contractors site staff and that the Site Manager and Contractors are constantly made aware of the contents through ongoing discussion.
- » Ensure that compliance with the EMPr is monitored through regular and comprehensive inspection of the site and surrounding areas.
- » Ensure that the Site Manager has input into the review and acceptance of construction methods and method statements.
- » Ensure that activities on site comply with all relevant environmental legislation.
- » Ensure that a removal is ordered of any person(s) and/or equipment responsible for any contravention of the specifications of the EMPr.
- » Ensure that any non-compliance or remedial measures that need to be applied are reported.
- » Keep records of all activities on site, problems identified, transgressions noted and a task schedule of tasks undertaken by the ECO.
- » Independently report to the Department of Environmental Affairs (DEA) in terms of compliance with the specifications of the EMPr and conditions of the EA (once issued).
- » Keep records of all reports submitted to DEA.

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, which must be increased if required. The ECO will be supplemented with the EPC Contractor's/Project Company's Environmental Office (EO) who will be located on site on a daily basis and will guide the EPC Contractor's/Project Company's to ensure compliance with the environmental considerations. Therefore, in the absence of the ECO there will 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.

**Contractor's Safety, Health and Environment Representative and/or Environmental Officer:** 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. In some instances, a separate Environmental Officer (EO) may be appointed to support this function.

The Contractor's Safety, Health and Environment Representative and/or Environmental Officer should:

- » Be well versed in environmental matters.
- » Understand the relevant environmental legislation and processes and the implementation thereof.
- » 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. The EO shall keep a daily diary for monitoring the site specific activities as per project schedule.
- » 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) and therefore needs the relevant training/ experience. The EO will have overall responsibility for day-to day environmental management and implementation of mitigations.
- » The EO is responsible for reporting to the ECO on the day-to-day on-site implementation of this EMPr and other Project Permits/Authorisations.
- » Ensure or otherwise train and induct all contractor's employees prior to commencement of any works.
- » Ensure that there is daily communication with the Site Manager regarding the monitoring of the site.
- » Compilation of Weekly and Monthly Monitoring Reports to be submitted to the ECO and Site Manager.
- » In addition, the EO/ Environmental Representative must act as project 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, ECO and Contractor(s).

**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 must appoint an Internal Environmental Officer (EO) who will be responsible for informing contractor 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 Internal Environmental Officer and Contractor's obligations in this regard include the following:

- » Must be fully knowledgeable on all environmental features of the construction site and the surrounding environment.
- » Be fully knowledgeable with the contents and 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 for the site.
- » Ensure a copy of the Environmental Authorisation and EMPr is easily accessible to all on-site staff members.
- » Ensure contractor employees are familiar with the requirements of this EMPr and the environmental specifications as they apply to the construction of the proposed facility.
- » Ensure that prior to commencing any site works, all contractor employees and sub-contractors must have attended environmental awareness training included in the induction training which must provide staff with an appreciation of the project's environmental requirements, and how they are to be implemented.

- » Ensure that any complaints received from the public are duly recorded and forwarded to the Site Manager and Contractor.
- » Manage the day-to-day on-site implementation of this EMPr, and the compilation of regular (usually weekly) Monitoring Reports.
- » Keep record of all activities on site, problems identified, transgressions noted and a task schedule of tasks undertaken, including those of the Independent ECO.
- » Inform staff of the environmental issues as deemed necessary by the Independent ECO.

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

- » Ensuring adherence to the environmental management specifications.
- » Ensuring that Method Statements are submitted to the Site Manager (and ECO) for approval before any work is undertaken.
- » 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 for the sub-contractors to constructively contribute towards the successful implementation of the EMPr (i.e. ensure their staff are appropriately trained on the environmental obligations).

**Community Liaison Officer (CLO)** will represent the community and assist the Owner, Contractor and the Engineer with communication between them and the community. Inform community regarding the project details, safety precautions and programme. Duties and responsibilities of the community liaison officer include:

- » Be available at the site offices generally between the hours of 07:00 and 09:00 and again from 15:00 until end of working day. Normal working hours will be from 07:00 am till 17:00.
- » Maintain an up-to-date record of potential employees within the community and provide the contractor with copies of this information.
- » To identify, screen and nominate labour from the community in accordance with the Contractor's requirements and determine, in consultation with the Contractor, the needs of local labour for employment and relevant technical training, where applicable.
- » Liaise between Contractor and labour regarding wages and conditions of employment.
- » Communicate daily with the Contractor on labour related issues such as numbers and skills.
- » Identify possible labour disputes, unrest, strikes, etc., in advance and assist in their resolution.
- » Have a good working knowledge of the contents of the contract document regarding labour and training matters.
- » Attend all meetings at which the community and/or labour is represented or discussed.
- » Attend contract site meetings and report on community and labour issues at these meetings.
- » Co-ordinate and assist with the obtaining of information regarding the community's needs (questionnaires, etc.).
- » Inform local labour of their conditions of temporary employment, to ensure their timeous availability and to inform them timeously of when they will be relieved.
- » Ensure that all labour involved in activities when tasks have been set, are fully informed of the principle of task-based work.

- » Attend disciplinary proceedings to ensure that hearings are fair and reasonable.
- » Keep a daily written record of interviews and community liaison.
- » Arrange venues for training if required.
- » Assist with the training and education of the community regarding the correct usage of the services, where applicable.
- » Any other duties that may become necessary as the works progress.

## 6.2 Objectives

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

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

<b>Project Component/s</b>	<ul style="list-style-type: none"> <li>» Area infrastructure (i.e. thermal plant and ancillary buildings).</li> <li>» Linear infrastructure (i.e. underground cabling, main access road and internal access roads and fencing).</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Hazards to landowners and the public.</li> <li>» Damage to indigenous natural vegetation.</li> <li>» Loss of threatened plant species.</li> <li>» Visual impact of general construction activities, and the potential scarring of the landscape due to vegetation clearing and resulting erosion.</li> </ul>
<b>Activities/Risk Sources</b>	<ul style="list-style-type: none"> <li>» Any unintended or intended open excavations (foundations and cable trenches).</li> <li>» Movement of construction vehicles in the area and on-site.</li> <li>» Transport to and from the temporary construction area/s.</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» To secure the site against unauthorised entry.</li> <li>» To protect members of the public/landowners/residents.</li> <li>» No loss of or damage to sensitive vegetation in areas outside the immediate development footprint.</li> <li>» Minimal visual intrusion by construction activities and intact vegetation cover outside of the immediate construction work areas.</li> </ul>

<b>Mitigation: Action/Control</b>	<b>Responsibility</b>	<b>Timeframe</b>
Secure site, working areas and excavations in an appropriate manner.	Contractor	Site establishment, and duration of construction
Ensure that no activities infringe on identified no-go, very high and high sensitivity areas.	Contractor	Duration of construction
The siting of the construction equipment camp/s must take cognisance of any sensitive areas identified in the EIA Report (refer to Figure 2.4 of this EMPr).	Contractor	Duration of construction
Ensure that vegetation is not unnecessarily cleared or removed during the construction phase.	Contractor	Site establishment, and duration of construction
Restrict the activities and movement of construction workers and vehicles to the immediate construction site and existing access roads.	Contractor	Construction
Access to adjacent areas to be strictly controlled.	Developer	Pre-construction

Mitigation: Action/Control	Responsibility	Timeframe
	Contractor	Construction
Any individuals of protected species affected by and observed within the development footprint during construction should be translocated under the supervision of the Contractor's SHE or EO.	SHE/EO Specialist	Construction
Ensure that rubble, litter, and disused construction materials are appropriately stored (if not removed daily) and then disposed regularly at licensed waste facilities.	Contractor	Construction
Reduce and control construction dust through the use of approved dust suppression techniques as and when required (i.e. whenever dust becomes apparent).	Contractor	Construction
Restrict construction activities to daylight hours in order to negate or reduce the visual impacts associated with lighting.	Contractor	Construction
The construction site must be fenced and security provided.	Contractor	Construction
Adequate protective measures must be implemented to prevent unauthorised access to the working area and the internal access routes.	Contractor	Construction
All unattended open excavations must be adequately demarcated and/or fenced.	Contractor	Construction
Establish appropriately bunded areas for storage of hazardous materials (e.g. fuel to be required during construction).	Contractor	Site establishment, and duration of construction
Visual impacts must be reduced during construction through minimising areas of surface disturbance, controlling erosion, using dust suppression techniques, and restoring exposed soil as closely as possible to their original contour and vegetation.	Contractor	Site establishment, and duration of construction
Cleared alien vegetation must not be dumped on adjacent intact vegetation during clearing but must be temporarily stored in a demarcated area.	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 so that the surrounding environment is not polluted (at least one sanitary facility for each sex and for every 30 workers as per the 2014 Construction Regulations; Section 30(1) (b)) at appropriate locations on site). The facilities must be placed within the construction area and along the road.	Contractor	Site establishment, and duration of construction
Ablution or sanitation facilities must not be located within 100m from a watercourse or within the 1:100 year flood.	Contractor	Site establishment, and duration of construction
Supply adequate weather and vermin proof waste collection bins and skips (covered at minimum with secured netting or shade cloth) at the site where construction is being undertaken. Separate bins should be provided for general and hazardous waste. Provision should be made for separation of waste for recycling.	Contractor	Site establishment, and duration of construction
Foundations and trenches must be backfilled to originally excavated materials as much as possible. Excess excavation materials must be disposed of only in approved areas, or, if suitable, stockpiled for use in reclamation activities.	Contractor	Site establishment, and duration of construction and rehabilitation

Mitigation: Action/Control	Responsibility	Timeframe
Eskom's rights and services must be acknowledged and respected at all times. Eskom shall at all times retain unobstructed access to and egress from its servitudes.	Contractor	Site establishment, and duration of construction, rehabilitation and operation

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» Site is secure and there is no unauthorised entry.</li> <li>» No members of the public/ landowners injured.</li> <li>» Appropriate and adequate waste management and sanitation facilities provided at construction site.</li> <li>» 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.</li> </ul>
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>» An incident reporting system is used to record non-conformances to the EMPr.</li> <li>» EO and ECO to monitor all construction areas on a continuous basis until all construction is completed. Non-conformances will be immediately reported to the site manager.</li> <li>» Monitoring of vegetation clearing during construction (by contractor as part of construction contract).</li> <li>» Monitoring of rehabilitated areas quarterly for at least a year following the end of construction (by contractor as part of construction contract).</li> </ul>

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

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

Mitigation: Action/Control	Responsibility	Timeframe
Restrict public access to works area including construction areas, laydown and storage sites via appropriate security. Only allow site access after appropriate induction and use of appropriate personal protective equipment	Contractors	Construction

Mitigation: Action/Control	Responsibility	Timeframe
Contractors and construction workers must be clearly informed of the no-go, very high and high sensitivity areas.	Developer Contractor	Prior to the commencement of construction
In order to minimise impacts on the surrounding environment, contractors must be required to adopt a certain Code of Conduct and commit to restricting construction activities to areas within the development footprint. Contractors and their sub-contractors must be familiar with the conditions of the Environmental Authorisation, the EIA Report, and this EMPr, as well as the requirements of all relevant environmental legislation.	Contractors	Construction
Contractors must ensure that all workers are informed at the outset of the construction phase of the conditions contained on the Code of Conduct.	Contractor and sub-contractor/s	Pre-construction
Introduce an incident reporting system to be tabled at weekly/monthly project meetings.	Contractor and sub-contractor/s	Pre-construction
All construction vehicles must adhere to clearly defined and demarcated roads. No driving outside of the development boundary must be permitted.	Contractor	Construction
Ensure all construction equipment and vehicles are properly maintained at all times.	Contractor	Construction
Restrict work activities that require power tools and plant that generates noise to normal working hours and limit such activities over weekends.	Contractor	Construction
Ensure that construction workers are clearly identifiable. All workers should carry identification cards and wear identifiable clothing.	Contractor	Construction
Appoint a community liaison officer to deal with complaints and grievances from the public.	Contractor	Construction
As far as possible, minimise vegetation clearing and levelling for equipment storage areas.	Contractor	Site establishment, and during construction
Ensure that operators and drivers are properly trained and make them aware, through regular toolbox talks, of any risk they may pose to the community and/or environment.	Contractor	Construction
Contact details of emergency services should be prominently displayed on site.	Contractor	Construction
Open fires on the site for heating, smoking or cooking are not allowed, except in designated areas.	Contractor	Construction
Contractor must provide adequate firefighting equipment on site and provide firefighting training to selected construction staff.	Contractor	Construction
Personnel trained in first aid should be on site to deal with smaller incidents that require medical attention.	Contractor	Construction
Road borders must be regularly maintained to ensure that vegetation remains short to serve as an effective firebreak. An emergency fire plan must be developed with emergency procedures in the event of a fire.	Contractor	Site establishment, and during construction
Encourage contractors and local people to report any suspicious activity associated with crime to the appropriate authorities.	Contractor	Construction



Mitigation: Action/Control	Responsibility	Timeframe
Ensure that the local municipalities, police, security companies, and policing forums are alerted to the increased construction activities in the region and the risk it poses in respect of crime.	Contractor	Duration of Contract
Ensure waste storage facilities are maintained and emptied on a regular basis.	Contractor	Site establishment, and duration of construction
No liquid waste, including grey water, may be discharged into any water body or drainage line. All sewage disposal to take place at a registered and operational wastewater treatment works. Proof of disposal to be retained as proof of responsible disposal.	Contractor	Maintenance: duration of contract within a particular area
Ensure that all personnel have the appropriate level of environmental awareness and competence to ensure continued environmental due diligence and on-going minimisation of environmental harm. This can be achieved through the provision of appropriate environmental awareness training to all personnel. Records of all training undertaken must be kept.	Contractor	Duration of construction
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.	Contractor	During construction.
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.	Contractor and sub-contractor/s	Duration of contract
Cooking and eating of meals must take place in a designated area. No fires are allowed on site. No firewood or kindling may be gathered from the site or surrounds.	Contractor and sub-contractor/s	Duration of contract
All litter must be deposited in a clearly marked, closed, animal-proof disposal bin in the construction area. Particular attention needs to be paid to food waste.	Contractor and sub-contractor/s	Duration of contract
Keep a record of all hazardous substances stored on site. Clearly label all the containers storing hazardous waste.	Contractor	Duration of contract
A Method Statement should be compiled for the management of pests and vermin within the site, specifically relating to the canteen area if applicable.	Contractor	Construction
No disturbance of flora or fauna must be undertaken outside of the demarcated construction area/s.	Contractor and sub-contractor/s	Duration of contract
Fire-fighting equipment and training must be provided before the construction phase commences and refresher training provided periodically, as required.	Contractor and sub-contractor/s	Pre-construction Duration of contract
Workers must be aware of the importance of watercourses and drainage systems (especially those located surrounding the project site) and the significance of not undertaking activities that could result in such pollution.	Contractor and EO	Pre-construction Construction
On completion of the construction phase, all construction workers must leave the site within one week of their contract ending.	Contractor and sub-contractor/s	Construction

Mitigation: Action/Control	Responsibility	Timeframe
When possible, no activity should be undertaken at the site between sunset and sunrise, except for security personnel guarding the development.	Contractor and sub-contractor/s	Construction
Keep record of all accidents or transgressions of safety in accordance with OHS Act and implement corrective action.	Contractor	Construction
Implement an HIV/AIDS Awareness and Training Programme for the Contractor's workforce and if feasible the local community within two weeks of commencement of construction. Ensure that the HIV/AIDS Awareness and Training Programme is consistent with national guidelines and/or IFC's Good Practice.	Contractor	Construction
Provide voluntary and free counselling, free testing and condom distribution services.	Contractor	Construction

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

**OBJECTIVE 4: Maximise local employment, skills development and business opportunities associated with the construction phase**

Employment opportunities will be created during the construction phase, specifically for semi-skilled and unskilled workers. 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.

<b>Project Component/s</b>	<ul style="list-style-type: none"> <li>» Construction activities associated with the establishment of the thermal plant and upgrading of the access road</li> <li>» Availability of required skills in the local communities for the undertaking of the construction activities.</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» The opportunities and benefits associated with the creation of local employment and business should be maximised.</li> </ul>

<b>Activities/Risk Sources</b>	<ul style="list-style-type: none"> <li>» Contractors who make use of their own labour for unskilled tasks, thereby reducing the employment and business opportunities for locals.</li> <li>» Sourcing of individuals with skills similar to the local labour pool outside the municipal area.</li> <li>» Unavailability of locals with the required skills resulting in locals not being employed and labour being sourced from outside the municipal area.</li> <li>» Higher skilled positions might be sourced internationally, where required.</li> </ul>
<b>Enhancement: Target/Objective</b>	<ul style="list-style-type: none"> <li>» The contractor 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.</li> <li>» Employment of a maximum number of the low-skilled and/or semi-skilled workers from the local area where possible.</li> <li>» Appropriate skills training and capacity building.</li> </ul>

Mitigation: Action/Control	Responsibility	Timeframe
Where feasible, effort must be made to employ locally in order to create maximum benefit for the communities. Ensure that the majority of the low-skilled workforce is recruited locally.	Contractor	Construction
Undertake a skills audit to determine level of skills and establish the development and training requirements.	Contractor	Construction
Commence with skill development programmes within the first month of construction	Contractor	Construction
Identify employment opportunities for women and ensure that women are employed on the construction site and are trained.	Contractor	Construction
Facilitate the transfer of knowledge between experienced employees and the staff.	Contractor	Construction
Identify opportunities for local businesses and ensure that the services from local businesses are prioritised.	Contractor	Construction

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» Composition of labour force and value of procurement from local businesses.</li> <li>» Level of skills imparted to local workforce.</li> </ul>
<b>Monitoring</b>	» Human Resources and Finance function to monitor and report on through audits.

### **OBJECTIVE 5: Protection of sensitive areas, flora, fauna and soils**

<b>Project Component/s</b>	<ul style="list-style-type: none"> <li>» Thermal plant.</li> <li>» Upgraded access road</li> <li>» Underground cabling.</li> <li>» Ancillary buildings.</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Impacts on natural vegetation, habitats and fauna.</li> <li>» Loss of indigenous natural vegetation due to construction activities.</li> <li>» Impacts on soil.</li> <li>» Loss of topsoil.</li> <li>» Erosion.</li> </ul>
<b>Activity/Risk Source</b>	<ul style="list-style-type: none"> <li>» Vegetation clearing.</li> <li>» Site preparation and earthworks.</li> <li>» Excavation of foundations.</li> </ul>

	<ul style="list-style-type: none"> <li>» Construction of infrastructure.</li> <li>» Site preparation (e.g. compaction).</li> <li>» Excavation of foundations.</li> <li>» Stockpiling of topsoil, subsoil and spoil material.</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» To minimise the development area as far as possible.</li> <li>» To minimise impacts on surrounding sensitive areas.</li> <li>» To minimise impacts on soils.</li> <li>» Minimise spoil material.</li> <li>» Minimise erosion potential.</li> </ul>

<b>Mitigation: Action/Control</b>	<b>Responsibility</b>	<b>Timeframe</b>
In order to minimise impacts on flora, fauna, and ecological processes, the development footprint should be limited to the minimum necessary to accommodate the required infrastructure.	Contractor	Duration of contract
Land clearance must only be undertaken immediately prior to construction activities.	Contractor	Construction
Retain and augment natural vegetation on all sides of the proposed project.	Contractor	Construction
During vegetation clearance, methods should be employed to minimise potential harm to fauna species.	Contractor	Construction
Prior and during vegetation clearance any larger fauna species noted should be given the opportunity to move away from the construction machinery.	Contractor	Construction
Areas to be cleared must be clearly marked on-site to eliminate the potential for unnecessary clearing. No vegetation removal must be allowed outside the designated project development footprint. Restrict construction activity to demarcated areas.	Contractor	Duration of Construction
Practical phased development and vegetation clearing must be practiced so that cleared areas are not left un-vegetated and vulnerable to erosion for extended periods of time. Where possible work should be restricted to one area at a time.	Contractor	Construction
Access to adjacent areas to be strictly controlled.	Developer Contractor	Pre-construction Construction
No harvesting of plants for firewood, medicinal or any other purposes are to be permitted	Contractor	Construction
No killing and poaching of any wild animal to be allowed. This should be clearly communicated to all employees, including subcontractors.	Contractor	Construction
Enforce ban on hunting, collecting etc. of all plants and animals or their products.	Contractor EO	Construction
No construction activity should occur near to active raptor nests should these be discovered prior to or during the construction phase.	Contractor	Construction
Areas beyond the development footprint should be expressly off limits to construction personnel and construction vehicles and this should be communicated to them.	Contractor	Construction
If trenches need to be dug for electrical cabling or other purpose, these should not be left open for extended periods of time as fauna may fall in and become trapped in them. Trenches which are	Contractor	Construction

Mitigation: Action/Control	Responsibility	Timeframe
standing open should have places where there are soil ramps allowing fauna to escape the trench.		
Any fauna threatened or injured during construction should be removed to safety by a suitably qualified person, or allowed to passively vacate the area.	Suitably qualified person	Construction
Education of employees on the conservation importance of natural areas and fauna must be provided.	Contractor	Construction
All construction vehicles should adhere to clearly defined and demarcated roads	Contractor	Construction
No collecting of flora species to be permitted.	Contractor	Construction
Topsoil must be removed and stored separately from subsoil and must be reapplied where appropriate as soon as possible in order to encourage and facilitate rapid regeneration of the natural vegetation on cleared areas.	Contractor	Construction
Soil stockpiles must not exceed 2 m in height.	Contractor	Construction
Soil stockpiles must be dampened with dust suppressant or equivalent to prevent erosion by wind.	Contractor	Construction
Soil stockpiles must be located away from any waterway or preferential water flow path in the landscape, to minimise soil erosion from these	Contractor	Construction
All graded or disturbed areas which will not be covered by permanent infrastructure such as paving, buildings or roads must be stabilised using appropriate erosion control measures.	Contractor	Construction
A method statement must be developed and submitted to the engineer to deal with erosion issues prior to bulk earthworks operations commencing.	Contractor	Before and during construction
Stockpiles are not to be used as stormwater control features.	Contractor	Construction
Any stockpiling of materials may not exceed two metres in height to reduce materials being blown away during high wind velocity events.	Contractor	Construction
Any erosion problems within the development area as a result of the construction activities observed must be rectified immediately and monitored thereafter to ensure that they do not re-occur.	Contractor	Construction
Where vegetation is not re-establishing itself in areas where surface disturbance occurred, soil samples must be collected, analysed for pH levels, electrical conductivity (EC) and major plant nutrient levels (calcium, magnesium, potassium) and sodium. When vegetation re-establishment still remains unsatisfactory, the bulk density of the soil should be measured with a penetrometer to determine whether compaction is an issue. The results must be submitted to a professional soil or agricultural scientist for recommendations on the amendment of the issue to ensure that the vegetation cover is established and erosion prevented.	Contractor Specialist	Construction
Any signs of soil erosion on site should be documented (including photographic evidence and coordinates of the problem areas) and submitted to the management team for further action.	Contractor	Construction

<b>Mitigation: Action/Control</b>	<b>Responsibility</b>	<b>Timeframe</b>
During construction the contractor shall protect areas susceptible to erosion by installing appropriate temporary and permanent drainage works as soon as possible and by taking other measures necessary to prevent the surface water from being concentrated in streams and from scouring the slopes, banks or other areas.	Contractor	construction
Create energy dissipation at discharge areas to prevent scouring	Contractor	construction
Activity at the site must be reduced after large rainfall events when the soils are wet. No driving off of hardened roads should occur at any time and particularly immediately following large rainfall events.	Contractor	Construction
Silt traps or cut-off berms downslope of working areas should be used where there is a danger of topsoil or material stockpiles eroding and entering watercourses and other sensitive areas.	Contractor	Construction
Erosion control measures to be regularly maintained.	Contractor	Construction
Bush clearing of all bushes and trees taller than one meter; Ensure proper storm water management designs are in place.	Contractor	Construction
If any erosion occurs, corrective actions (erosion berms) must be taken to minimize any further erosion from taking place.	Contractor	Construction
If erosion has occurred, topsoil should be sourced and replaced and shaped to reduce the recurrence of erosion.	Contractor	Construction
Only the designated access routes are to be used to reduce any unnecessary compaction.	Contractor	Construction
Compacted areas are to be ripped to loosen the soil structure.	Contractor	Construction
The topsoil should be stripped by means of an excavator bucket, and loaded onto dump trucks.	Contractor	Construction
Topsoil is to be stripped when the soil is dry, as to reduce compaction.	Contractor	Construction
The handling of the stripped topsoil will be minimized to ensure the soil's structure does not deteriorate significantly	Contractor	Construction
Compaction of the removed topsoil must be avoided by prohibiting traffic on stockpiles.	Contractor	Construction
The stockpiles will be vegetated (details contained in rehabilitation plan) in order to reduce the risk of erosion, prevent weed growth and to reinstitute the ecological processes within the soil.	Contractor	Construction
Only the designated access routes are to be used to reduce any unnecessary compaction.	Contractor	Construction
Compacted areas are to be ripped to loosen the soil structure.	Contractor	Construction
Place the above cleared vegetation were the topsoil stockpiles are to be placed.	Contractor	Construction
All construction vehicles must adhere to a low speed limit (40km/h) to avoid collisions with susceptible species such as snakes and tortoises.	Contractor	Construction Operation
Outside lighting should be designed to minimise impacts on fauna.	Contractor	Before construction
All night-lighting should use low-UV type lights (such as most LEDs), which do not attract insects. The lights should also be of types	Contractor	Construction



Mitigation: Action/Control	Responsibility	Timeframe
which are directed downward and do not result in large amounts of light pollution.		
Fluorescent and mercury vapour lighting should be avoided and sodium vapour (yellow) lights should be used wherever possible.	Contractor	Construction
In order to reduce low intensity noise levels, work areas need to be effectively screened to reduce or deflect noise. Engineering controls such as modifications to equipment or work areas to make it quieter, the acquisition of equipment designed to emit low noise and vibration, creation of noise barriers, proper maintenance of tools and equipment must be considered. Noise from vehicles and powered machinery and equipment on-site should not exceed the manufacturer's specifications, based on the installation of a silencer. Equipment should be regularly serviced. Attention should also be given to muffler maintenance and enclosure of noisy equipment.	Contractor	Construction

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» No disturbance outside of designated work areas.</li> <li>» Minimised clearing of existing vegetation.</li> <li>» Vegetation and habitat loss restricted to infrastructure footprint.</li> <li>» No poaching etc of fauna by construction personnel during construction.</li> <li>» Removal to safety of fauna encountered during construction</li> <li>» Low mortality of fauna due to construction machinery and activities</li> <li>» Topsoil appropriately stored, managed and rehabilitated.</li> <li>» Limited soil erosion around site.</li> <li>» No activity in restricted areas.</li> <li>» Minimal level of soil degradation.</li> </ul>
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>» Contractor's Environmental Officer (EO) to provide supervision and oversight of vegetation clearing activities within sensitive areas such as near the pan.</li> <li>» Supervision of all clearing and earthworks.</li> <li>» Ongoing monitoring of erosion management measures within the site.</li> <li>» Monthly inspections of sediment control devices by the EO.</li> <li>» An incident reporting system will be used to record non-conformances to the EMPr.</li> </ul>

### **OBJECTIVE 6: Minimise the establishment and spread of alien invasive plants**

Major factors contributing to invasion by alien invader plants include high disturbance activities. Consequences of this may include:

- » Loss of indigenous vegetation;
- » Change in vegetation structure leading to change in various habitat characteristics;
- » Change in plant species composition;
- » Change in soil chemical properties;
- » Loss of sensitive habitats;
- » Loss or disturbance to individuals of rare, endangered, endemic, and/or protected species;
- » Fragmentation of sensitive habitats;

- » Change in flammability of vegetation, depending on alien species; and
- » Hydrological impacts due to increased transpiration and runoff.

<b>Project Component/s</b>	<ul style="list-style-type: none"> <li>» Thermal plant.</li> <li>» Access road.</li> <li>» Associated infrastructure.</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Invasion of natural vegetation surrounding the site by declared weeds or invasive alien species.</li> <li>» Impacts on soil.</li> <li>» Impact on faunal habitats.</li> <li>» Degradation and loss of agricultural potential.</li> </ul>
<b>Activities/Risk Sources</b>	<ul style="list-style-type: none"> <li>» Transport of construction materials to site.</li> <li>» Movement of construction machinery and personnel.</li> <li>» Site preparation and earthworks causing disturbance to indigenous vegetation.</li> <li>» Construction of site access roads.</li> <li>» Stockpiling of topsoil, subsoil and spoil material.</li> <li>» Routine maintenance work – especially vehicle movement.</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» To significantly reduce the presence of weeds and eradicate alien invasive species.</li> <li>» To avoid the introduction of additional alien invasive plants to the site.</li> <li>» To avoid distribution and thickening of existing alien plants in the site.</li> <li>» To complement existing alien plant eradication programs in gradually causing a significant reduction of alien plant species throughout the site.</li> </ul>

<b>Mitigation: Action/Control</b>	<b>Responsibility</b>	<b>Timeframe</b>
Develop and implement an IAP Control and Eradication Programme.	Contractor	Construction
Avoid creating conditions in which alien plants may become established: <ul style="list-style-type: none"> <li>» Keep disturbance of indigenous vegetation to a minimum.</li> <li>» Rehabilitate disturbed areas as quickly as possible.</li> <li>» Do not import soil from areas with alien plants.</li> </ul>	Contractor	Construction
When alien plants are detected, these must be controlled and cleared using the recommended control measures for each species to ensure that the problem is not exacerbated or does not re-occur.	Contractor	Construction
Eradicate all weeds and alien invasive plants as far as practically possible and ensure that material from invasive plants are adequately destroyed and not further distributed. Continually monitor the re-emergence of these species and manage according to the invasive species management plan.	Contractor	Construction
Any alien and invasive vegetation removed should be taken to a registered landfill site to prevent the proliferation of alien and invasive species	Contractor	Construction
The use of herbicides and pesticides and other related horticultural chemicals should be carefully controlled and only applied by personnel adequately certified to apply pesticides and herbicides. It must be ensured that WHO Recommended Classification of Pesticides by Hazard Class 1a (extremely hazardous) or 1b (highly hazardous) are not purchased, stored or	Contractor	Construction

Mitigation: Action/Control	Responsibility	Timeframe
used on site along with any other nationally or internationally similarly restricted/banned products.		
It is strongly recommended that alien and invasive species be cleared from the Vlermuisleegte River as part of the proposed upgrade to the access road. This clearing should focus on the greater freshwater network and not only selective areas.	Contractor	Construction

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

## OBJECTIVE 7: Minimise impacts on water resources

<b>Project component/s</b>	<ul style="list-style-type: none"> <li>» Construction activities</li> <li>» Storage of dangerous goods.</li> <li>» Ablution facilities.</li> <li>» Compaction of soil.</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Pollutants such as lime-containing (high pH) construction materials such as concrete, cement, grouts, etc. could be harmful to aquatic biota, particularly during low flows when dilution is reduced.</li> <li>» Removal of freshwater habitat.</li> <li>» Compaction of soils within and surrounding the watercourses.</li> <li>» Erosion of soils surrounding watercourses.</li> <li>» Potential proliferation of alien and invasive species within the watercourses</li> </ul>
<b>Activity/risk source</b>	<ul style="list-style-type: none"> <li>» Fuelling, usage and maintenance of construction vehicles.</li> <li>» Cement batching and usage.</li> <li>» Labourer using ablution facilities.</li> <li>» Use of any chemicals or hazardous materials/dangerous goods during construction.</li> <li>» Development of upgraded access road within the delineated boundary of the Vlermuisleegte River.</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» Reduce potential loss of habitat and ecological structure</li> <li>» No incidents related to spills of chemicals and hazardous materials.</li> <li>» No release of contaminated water in watercourses including streams and pans.</li> <li>» No misbehaviour of construction workers (i.e. ablution activities, washing).</li> </ul>

Mitigation: Action/control	Responsibility	Timeframe
During the construction of the upgraded access road, a buffer of no more than 5m on either side of the proposed road reserve may be impacted. These areas must be cordoned off, and no vehicles or personnel are permitted outside of the authorised construction area.	Contractor	Construction
Contractor laydown areas, and material storage facilities to remain outside of the Vlermuisleegte river and its 32m NEMA (ZoR).	Contractor	Construction
Implement strict management of all hazardous materials/dangerous goods used on site. Spilled fuel, oil or grease is retrieved where possible, and contaminated soil removed, cleaned and replaced. Contaminated soil to be collected by the Contractor and disposed of at a waste site designated for this purpose.	Contractor	Construction
Ensure strict management of potential sources of pollution (hydrocarbons from vehicles and machinery, cement during construction, etc.). Bunded containment to be provided below and around any fuel storage containers.	Contractor	Construction
Construction equipment is to be checked daily (by Contractor) to ensure that no fuel spillage takes place from construction vehicles or machinery.	Contractor	Construction
Proper use of ablutions should be strictly enforced.	Contractor	Construction
No activities shall be allowed to encroach into identified sensitive areas in the adjacent conservation area.	Contractor	Construction
Any cement mixing should be done within the designated batching area only and must not be mixed within or near any watercourses or within the 32m NEMA ZoR	Contractor	Construction
Sand, stone and cement are stored in demarcated areas, and are covered or sealed to prevent wind erosion and resultant deposition of dust on the surrounding indigenous vegetation.	Contractor	Construction
Any excess sand, stone and cement must be removed from site at the completion of the construction period.	Contractor	Construction
Measures must be put in place to control illegal dumping of construction waste as this may result in the pollution of surface water run-off. Furthermore, no pollution of groundwater resources may occur.	Contractor	Construction
Any areas disturbed during the construction phase should be encouraged to rehabilitate as fast and effective as possible.	Contractor	Construction
Compilation of a soil stripping guideline to preserve high value topsoil for rehabilitation. Also input into the location of stockpiles away from preferential flow paths.	Contractor	Construction
Where possible, reduce the footprint area of exposed ground during periods of high rainfall. Prioritise vegetation clearing for the winter months as far as possible.	Contractor	Construction
Exposed areas must be ripped and vegetated to increase surface roughness.	Contractor	Construction
Surface and storm water run-off needs to be diverted through an oil/water separator before leaving the site.	Contractor	Construction

<b>Performance Indicator</b>	» No direct impacts on the watercourses in the vicinity of the facility. » No major preventable spillages are recorded.
<b>Monitoring</b>	» Monitor management measures in place for potentially hazardous materials.

### **OBJECTIVE 8: Appropriate Storm Water Management**

The storm water management is covered under the Pre-construction and Construction Phase management, but aspects thereof will also continue into the Operation Phase. It is important that the engineers and contractors responsible for the detailed design of the storm water systems take into account the requirements of this EMPr, as well as the recommendations by the participating specialists.

<b>Project Component/s</b>	» Alteration of natural areas into hard surfaces impacting on the local hydrological regime of the area.
<b>Potential Impact</b>	» Poor storm water management and alteration of the hydrological regime.
<b>Activities/Risk Sources</b>	» Placement of hard engineered surfaces.
<b>Mitigation: Target/Objective</b>	» Reduce the potential increase in surface flow velocities and the impact on localised drainage systems.

<b>Mitigation: Action/Control</b>	<b>Responsibility</b>	<b>Timeframe</b>
Stormwater management around the construction footprint areas must be considered to ensure that sediment-laden run-off does not enter the surrounding watercourses. Of specific mention is the development of the upgraded access road which may potentially impact on the Vlermuisleegte River.	Contractor	Construction
Water imported to the construction site may not be allowed to drain into the Vlermuisleegte River or perched depression wetland, and should be managed with appropriate stormwater management systems.	Contractor	Construction
Any storm water within the site must be handled in a suitable manner. Contaminated water must not be discharged into the watercourses.	Contractor and Engineers	Construction
All roads and other hardened surfaces must have runoff control features which redirect water flow and dissipate any energy in the water which may pose an erosion risk.	Contractor	Construction
The access road should be permeable to allow for drainage from the road surface. In this regard, suitable stormwater management should be implemented to allow for water to drain from the road without causing erosion.	Contractor	Construction
Where discharge of rainwater on roads will be channelled directly into the natural environment, the application of diffuse flow measures must be included in the design	Contractor	Construction
Storm water control systems must be implemented to reduce erosion on the project site.	Contractor	Construction

Mitigation: Action/Control	Responsibility	Timeframe
Drainage measures must promote the dissipation of storm water run-off.	Contractor	Construction
Any loss/alteration of flow dynamics must be quantified, and mitigation options to re-introduce water in a safe and environmentally friendly way must be assessed.	Contractor	Construction
Site surface water and wash water must be contained and treated before reuse or discharge from site	Contractor	Construction

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» No impacts due to runoff.</li> <li>» Minimise erosion as far as possible.</li> <li>» Appropriate storm water management system in place.</li> </ul>
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>» Ongoing monitoring of erosion management measures within the site.</li> <li>» Monthly inspections of sediment control devices by the EO.</li> <li>» An incident reporting system will be used to record non-conformances to the EMPr.</li> </ul>

### OBJECTIVE 9: Protection of heritage resources

The red sand covering much of the project site is sterile of archaeological materials. However, areas where stone artefacts were identified, were areas which comprised of gravel, such as the thermal plant area and along the margins of the Vlermuisleegte River.

The basement rocks in the region are of lava with an outcrop occurring on the project site in the Vlermuisleegte River. Although the SAHRIS Palaeosensitivity Map indicates the area to be of moderate sensitivity, based on the specialists' experience from other projects, suggests that the area should be regarded as of generally low sensitivity with the possibility of small pockets of high sensitivity occurring in places. The main concern is likely to be the potential occurrence of mammalian remains in solution hollows in the calcrete or associated with old pan or vleis deposits along drainage lines.

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

Mitigation: Action/control	Responsibility	Timeframe
Contractors must be informed before construction starts on the possible types of heritage sites and cultural material they may encounter and the procedures to follow if they find sites. All staff	Contractor, ESA and heritage specialist	Duration of contract, particularly during excavations



Mitigation: Action/control	Responsibility	Timeframe
should also be familiarised with procedures for dealing with heritage objects/sites.		
Environmental Officer (EO) to alert workers to the importance of reporting fossil bones seen on site and to the possibility of encountering human remains..	EO	Construction
Areas required to be cleared during construction must be clearly marked in the field to avoid unnecessary disturbance of adjacent areas.	Contractor	Construction
EO, site foreman or other responsible person to monitor excavations for pylon foundations and clearance for access road for fossils and also explain to workers the need to protect and report any fossils uncovered during development. If fossils are found they must be protected in situ, the Chance Fossil Finds Procedure must be implemented and the finds must be reported to a qualified palaeontologist or SAHRA for evaluation. If the Chance Fossil Finds Procedure is implemented properly then this evaluation can often occur remotely.	EO	Construction
A chance find procedure must be developed and implemented in the event that archaeological or palaeontological resources are found. In the case where the proposed development activities bring these materials to the surface, work must cease and SAHRA must be contacted immediately.	Contractor Heritage specialist	Construction
Familiarise all staff and contractors with procedures for dealing with heritage objects/sites.	Heritage Specialist	Pre-construction
If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA.	<u>Contractor</u> <u>EO</u>	<u>Construction</u>
In the event that fossils resources are discovered during excavations, immediately stop excavation in the vicinity of the potential material. Mark (flag) the position and also spoil material that may contain fossils. Inform the site foreman and the EO. EO to inform the Developer; the Developer contacts the standby archaeologist and/or palaeontologist. EO to describe the occurrence and provide images by email.	Contractor and EO	Construction

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» No disturbance outside of designated work areas.</li> <li>» All heritage items located are dealt with as per the legislative guidelines.</li> </ul>
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>» Observation of excavation activities by the EO throughout construction phase.</li> <li>» Supervision of all clearing and earthworks.</li> <li>» Due care taken during earthworks and disturbance of land by all staff and any heritage objects found reported.</li> </ul>

- » Appropriate permits obtained from SAHRA prior to the disturbance or destruction of heritage sites (if required).
- » An incident reporting system will be used to record non-conformances to the EMPr.

## OBJECTIVE 10: Management of dust and air emissions

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

<b>Project component/s</b>	<ul style="list-style-type: none"> <li>» Thermal plant.</li> <li>» Access roads.</li> <li>» Associated infrastructure.</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Dust generation and particulates from vehicle movement to and on-site, foundation excavation, road construction activities, road maintenance activities, temporary stockpiles, and vegetation clearing affecting the surrounding residents and visibility.</li> <li>» Release of minor amounts of air pollutants (for example NO<sub>2</sub>, CO and SO<sub>2</sub>) from vehicles and construction equipment.</li> </ul>
<b>Activity/risk source</b>	<ul style="list-style-type: none"> <li>» Clearing of vegetation and topsoil.</li> <li>» Excavation, grading, scraping, levelling, digging, drilling and associated construction activities.</li> <li>» Transport of materials, equipment, and components on internal access roads and the associated increased traffic.</li> <li>» Vehicle movement on gravel roads.</li> <li>» Re-entrainment of deposited dust by vehicle movements.</li> <li>» Wind erosion from topsoil and spoil stockpiles and unsealed roads and surfaces.</li> <li>» Fuel burning vehicle and construction engines.</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» To ensure emissions from all vehicles and construction engines are minimised, where possible, for the duration of the construction phase.</li> <li>» To minimise nuisance to the community from dust emissions and to comply with workplace health and safety requirements for the duration of the construction phase.</li> <li>» Suppression of dust, pollution control and minimise dust generation.</li> </ul>

Mitigation: Action/control	Responsibility	Timeframe
Implement appropriate dust suppression measures on a regular basis along the gravel access road and on the proposed site.	Contractor	Construction
As far as practically possible, tarred road construction should precede construction activities for the thermal power generation facility, especially within 200 m of the homesteads located along the access road	EPC Contractor(s) and EO	During construction
Roads must be maintained to a manner that will ensure that nuisance to the community from dust emissions from road or vehicle sources is not visibly excessive.	Contractor	Construction
The site access road leading into the site should be hard surfaced for 40 m or more to reduce material carry into Western Arterial	Contractor	Construction

Mitigation: Action/control	Responsibility	Timeframe
Appropriate dust suppression measures on cleared areas, temporary stockpiles, and unsealed roads such as water suppression (using non-potable water if possible), chemical stabilisation, or revegetation (as soon as practically feasible), especially during high wind speed events	EPC Contractor(s) and EO	Construction
Additional dust control measures (sweeping; screens; berms and/or water suppression - using non-potable water if possible) along access road near homesteads during construction of access road sections and during thermal power generation facility construction.	EPC Contractor(s) and EO	During construction
Haul vehicles moving outside the construction site carrying material that can be wind-blown will be covered with suitable material tarpaulins shade cloth.	Contractor	Duration of contract
Ensure that vehicles used to transport sand and building materials are fitted with tarpaulins or covers.	Contractor	Duration of contract
Speed of construction vehicles must be restricted (40km/hr for haul trucks on access roads; 20 km/hr for all large vehicles near residences or on-site).	Contractor	Duration of contract
Dust-generating activities or earthworks may need to be rescheduled or the frequency of application of dust control/suppressant increased during periods of high winds if visible dust is blowing toward nearby residences outside the site.	Contractor	Duration of contract
Disturbed areas must be re-vegetated as soon as practicable in line with the progression of construction activities.	Contractor	Completion of construction
Vehicles and equipment must be maintained in a road-worthy condition at all times.	Contractor	Duration of contract
All vehicles and containers used for moving waste must encapsulate the waste, which prevents the waste from causing odours and from escaping or blowing around the site. This will also prevent leachate material from spilling out of the containers, which is hazardous.	Contractor	Duration of contract
Should a batching plant be required, this must be enclosed with shade cloth to reduce the amount of cement particulates/ particles released into the environment.	Contractor	Duration of contract

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» No complaints from affected residents or community regarding dust or vehicle emissions.</li> <li>» Visual presence of dust and air quality.</li> <li>» Road worthy certificates in place for all heavy vehicles at outset of construction phase and up-dated on a monthly basis.</li> <li>» Appropriate dust suppression measures are implemented during construction phrase. No visible dust plumes from cleared areas and temporary stockpiles during high wind speed events. No visible plumes from roads when in use or during high wind speed events.</li> </ul>
<b>Monitoring</b>	<p>Monitoring must be undertaken to ensure emissions are not exceeding the prescribed levels via the following methods:</p> <ul style="list-style-type: none"> <li>» Immediate reporting by personnel of any potential or actual issues with nuisance dust or emissions to the Site Manager.</li> </ul>

	<ul style="list-style-type: none"> <li>» 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.</li> <li>» An incident register and non-conformance must be used to record incidents and non-conformances to the EMPr.</li> <li>» A complaints register must be used to record grievances by the public</li> </ul>
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**OBJECTIVE 11: Minimise impacts related to traffic management and transportation of equipment and materials to site**

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

Mitigation: Action/Control	Responsibility	Timeframe
Should abnormal loads have to be transported by road to the site, a permit must be obtained from the relevant Provincial Government. Alert traffic authorities well in advance of any heavy loads that will be transported on local roads and elicit their assistance in controlling traffic associated with the transportation of these loads.	Contractor (or appointed transportation contractor)	Pre-construction
Ensure that, at all times, people have access to their properties as well as to social facilities.	Developer Contractor	Construction
Limit the need for transportation over long distances by sourcing as much materials and goods as is feasible from local suppliers.	Contractor	Construction
Heavy vehicles used for construction purposes should be inspected regularly to ensure their road-worthiness.	Contractor	Construction
Strict vehicle safety standards should be implemented and monitored.	Contractor	Construction

Mitigation: Action/Control	Responsibility	Timeframe
No deviation from approved transportation routes must be allowed, unless roads are closed for whatever reason outside the control of the contractor.	Contractor	Construction
Appropriate road management strategies must be implemented on external and internal roads with all employees and contractors required to abide by standard road and safety procedures.	Contractor (or appointed transportation contractor)	Construction
Heavy construction vehicles should be restricted to off-peak periods. Schedule the delivery hours to avoid peak hour traffic, weekends and evenings and stagger component delivery to site.	Contractor	Construction
Staff and general trips to the site should occur outside of peak traffic periods.	Contractor	Construction
Any traffic delays expected because of construction traffic must be co-ordinated with the appropriate authorities.	Contractor	Construction
When upgrading, constructing and maintaining the access road ensure that proper hazard warnings signage and traffic control mechanisms such as flags men and traffic control barriers, chevrons and traffic cones separating the road from the worksite are in place at all times	Contractor	Construction
Visible 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 throughout the construction period.	Contractor	Construction
Erect temporary road signage on Western Arterial either side of the site access warning motorists of construction traffic activity in order to enhance road safety during construction.	Contractor	Construction
All vehicles of the contractor travelling on public roads must adhere to the specified speed limits and all drivers must be in possession of an appropriate valid driver's license.	Contractor	Construction
All construction vehicles must remain on properly demarcated roads. No off-road driving to be allowed.	Contractor	Construction
Implement penalties for reckless driving for the drivers of heavy vehicles as a way to enforce compliance to traffic rules.	Contractor	Construction
Staff and general trips must occur outside of peak traffic periods.	Contractor	Construction
The contractors must ensure that there is a dedicated access and an access control point to the site.	Contractor	Construction
Provide clearly defined roadway, parking and pedestrian walkway areas within the site with adequate lighting	Contractor	Construction
All construction vehicles must be road worthy.	Contractor	Construction
All construction vehicle drivers must have the relevant licenses of the use of the vehicles and need to strictly adhere to the rules of the road.	Contractor	Construction
Heavy construction vehicles should be restricted to off-peak periods.	Contractor	Construction
Abnormal load vehicles require specific permit for transporting loads, and require liaison with relevant road authorities to ensure route suitability.	Contractor	Construction

Mitigation: Action/Control	Responsibility	Timeframe
Erect temporary road signage on Western Arterial either side of the site access warning motorists of construction traffic activity in order to enhance road safety during construction.	Contractor	Construction
Provide flagmen at the access when accommodating abnormal load vehicles.	Contractor	Construction
Road signage and road markings in the vicinity of the site should be well maintained to enhance road safety.	Contractor	Construction

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

### **OBJECTIVE 12: Appropriate handling and management of waste**

The construction of the thermal plant and upgraded access road will involve the generation of various wastes. 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. The main wastes expected to be generated by the construction activities include:

- » general solid waste
- » hazardous waste
- » inert waste (rock and soil)
- » liquid waste (including grey water and sewage)

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



<b>Mitigation: Action/Control</b>	<b>Responsibility</b>	<b>Timeframe</b>
Construction method and materials should be carefully considered in view of waste reduction, re-use, and recycling opportunities.	Contractor	Duration of contract
Construction contractors must provide specific detailed waste management plans to deal with all waste streams.	Contractor	Duration of contract
Ensure that no litter, refuse, wastes, rubbish, rubble, debris and builders wastes generated on the premises be placed, dumped or deposited on adjacent/surrounding properties, and that the waste is disposed of at dumping site as approved by the Council.	Contractor	Duration of contract
Waste disposal at the construction site must be avoided by separating and trucking out of waste.	Contractor	Construction
Specific areas must be designated on-site for the temporary management of various waste streams, i.e. general refuse, construction waste (wood and metal scrap), and contaminated waste as required. Location of such areas must seek to minimise the potential for impact on the surrounding environment, including prevention of contaminated runoff, seepage, and vermin control.	Contractor	Duration of contract
Where practically possible, construction and general wastes on-site must be reused or recycled. Bins and skips must be available on-site for collection, separation, and storage of waste streams (such as wood, metals, general refuse etc.).	Contractor	Duration of contract
Disposal of waste must be in accordance with relevant legislative requirements, including the use of licensed contractors.	Contractor	Duration of contract
Uncontaminated waste must be removed at least weekly for disposal, if feasible; other wastes must be removed for recycling/ disposal at an appropriate frequency.	Contractor	Duration of contract
Hydrocarbon waste must be contained and stored in sealed containers within an appropriately bunded area and clearly labelled.	Contractor	Duration of contract
Waste must be kept to a minimum and must be transported by approved waste transporters to sites designated for their disposal.	Contractor	Duration of contract
No liquid waste, including grey water, may be discharged into any water body or drainage line. All sewage disposal to take place at a registered and operational wastewater treatment works. Slips of disposal to be retained as proof of responsible disposal.	Contractor	Maintenance: duration of contract within a particular area
All liquid wastes should be contained in appropriately sealed vessels/ponds within the footprint of the development, and be disposed of at a designated waste management facility after use.	Contractor	Duration of contract
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 landfill site.	Contractor	During and post construction.
Documentation (waste manifest) must be maintained detailing the quantity, nature, and fate of any regulated waste. Waste disposal records must be available for review at any time.	Contractor	Duration of contract
SABS approved spill kits to be available and easily accessible.	Contractor	Duration of contract

Mitigation: Action/Control	Responsibility	Timeframe
Regularly serviced chemical toilet facilities and/or septic tank must be used to ensure appropriate control of sewage.	Contractor	Duration of contract
Daily inspection of all chemical toilets and septic tanks must be performed by environmental representatives on site.	Contractor	Duration of contract
In the event where sewage is discharged into the environment, all contaminated vegetation/ rock and soil must be removed immediately and treated as hazardous waste.	Contractor	Duration of construction
Ensure that the below ground storage of the septic tank can withstand the external forces of the surrounding pressure. The area above the tank must be demarcated to prevent any vehicles or heavy machinery from driving around the tank.	Contractor	Duration of construction
Under no circumstances may waste be burnt on site.	Contractor	Duration of construction
Where a registered waste site is not available close to the construction site, provide a method statement with regard to waste management.	Contractor	Duration of construction
Waste manifests must be provided for all waste streams generated on site, and must be kept on site.	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. Where solid waste is disposed of, such disposal shall only occur at a landfill licensed in terms of section 20(b) of the National Environmental Management Waste Act, 2008 (Act 59 of 2008).	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 materials re-used for an appropriate purpose.	Contractor	Completion of construction
Upon the completion of construction, all sanitation facilities (including chemical toilets) must be removed, as well as the associated waste to be disposed of at a registered waste disposal site.	Contractor	Completion of construction
Litter generated by the construction crew must be collected in rubbish bins and disposed of weekly, or at an appropriate frequency, at registered waste disposal sites.	Contractor	Duration of construction
All building rubble, solid and liquid waste etc. generated during the construction activities must be disposed of as necessary at an appropriately licensed refuse facility.	Contractor	Duration of construction
Ensure that no refuse wastes are burnt on the premises or on surrounding premises. No fires will be allowed on site.	Contractor	Duration of construction
Ensure that no litter, refuse, wastes, rubbish, rubble, debris and builders wastes generated on the premises be placed, dumped or deposited on adjacent/surrounding properties during or after the construction period of the project and that the waste is disposed of at dumping site as approved by the Council.	Contractor	Duration of construction

<b>Performance Indicator</b>	» No complaints received regarding waste on site or indiscriminate dumping.
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	<ul style="list-style-type: none"> <li>» Internal site audits ensuring that waste segregation, recycling and reuse is occurring appropriately.</li> <li>» Provision of all appropriate waste manifests for all waste streams.</li> </ul>
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>» Observation and supervision of waste management practices throughout construction phase.</li> <li>» Waste collection will be monitored on a regular basis.</li> <li>» Waste documentation completed.</li> <li>» Proof of disposal of sewage at an appropriate wastewater treatment works.</li> <li>» 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.</li> <li>» An incident reporting system will be used to record non-conformances to the EMPr.</li> </ul>

**OBJECTIVE 13: Appropriate handling and storage of chemicals, hazardous substances**

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

<b>Project Component/s</b>	<ul style="list-style-type: none"> <li>» Laydown areas.</li> <li>» Subcontractors' camps.</li> <li>» Temporary hydrocarbon and chemical storage areas.</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Release of contaminated water from contact with spilled chemicals.</li> <li>» Generation of contaminated wastes from used chemical containers.</li> <li>» Soil pollution.</li> </ul>
<b>Activity/Risk Source</b>	<ul style="list-style-type: none"> <li>» Vehicles associated with site preparation and earthworks.</li> <li>» Construction activities of area and linear infrastructure.</li> <li>» Hydrocarbon spills by vehicles and machinery during levelling, vegetation clearance and transport of workers, materials and equipment and fuel storage tanks.</li> <li>» Accidental spills of hazardous chemicals.</li> <li>» Polluted water from wash bays and workshops.</li> <li>» Pollution from concrete mixing.</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» To ensure that the storage and handling of chemicals and hydrocarbons on-site does not cause pollution to the environment or harm to persons.</li> <li>» To ensure that the storage and maintenance of machinery on-site does not cause pollution of the environment or harm to persons.</li> <li>» Prevent and contain hydrocarbon leaks.</li> <li>» Undertake proper waste management.</li> <li>» Store hazardous chemicals safely in a bunded area.</li> </ul>

<b>Mitigation: Action/Control</b>	<b>Responsibility</b>	<b>Timeframe</b>
Implement an emergency preparedness plan during the construction phase.	Contractor	Duration of Contract
Any liquids stored on site, including fuels and lubricants, should be stored in accordance with applicable legislation.	Contractor	Duration of Contract
Spill kits must be made available on-site for the clean-up of spills and leaks of contaminants.	Contractor	Duration of contract

Mitigation: Action/Control	Responsibility	Timeframe
Losses of fuel and lubricants from the oil sumps and steering racks of vehicles and equipment must be contained using a drip tray with plastic sheeting filled with absorbent material when not parked on hard standing.	Contractor	Construction
Establish an appropriate Hazardous Stores which is in accordance with the Hazardous Substance Amendment Act, No. 53 of 1992. This should include but not be limited to: <ul style="list-style-type: none"> <li>» Designated area;</li> <li>» All applicable safety signage;</li> <li>» Firefighting equipment;</li> <li>» Enclosed by an impermeable bund;</li> <li>» Protected from the elements,</li> <li>» Lockable;</li> <li>» Ventilated; and</li> <li>» Has adequate capacity to contain 110% of the largest container contents.</li> </ul>	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. Where required, a NEMA Section 30 report must be submitted to DEA within 14 days of the incident.	Contractor	Duration of contract
In the event of a major spill or leak of contaminants, the relevant administering authority must be immediately notified as per the notification of emergencies/incidents.	Contractor	Duration of contract
Spilled concrete must be cleaned up as soon as possible and disposed of at a suitably licensed waste disposal site. Check vehicles and machinery daily for oil, fuel and hydraulic fluid leaks and undertake regular high standard maintenance on vehicles.	Contractor	Duration of contract
Accidental spillage of potentially contaminating liquids and solids must be cleaned up immediately in line with procedures by trained staff with the appropriate equipment.	Contractor	Duration of contract
Any contaminated/polluted soil removed from the site must be disposed of at a licensed hazardous waste disposal facility.	Contractor	Duration of contract
Routine servicing and maintenance of vehicles must not to take place on-site (except for emergencies). If repairs of vehicles must take place, an appropriate drip tray must be used to contain any fuel or oils.	Contractor	Duration of contract
All stored fuels to be maintained within an appropriate bund and on a sealed surface as per the requirements of SABS 089:1999 Part 1 and any relevant by-laws.	Contractor	Duration of contract
Fuel storage areas must be inspected regularly to ensure bund stability, integrity, and function.	Contractor	Duration of contract
Construction machinery must be stored in an appropriately sealed area.	Contractor	Duration of contract
Oily water from bunds at the substation must be removed from site by licensed contractors.	Contractor	Duration of contract

<b>Mitigation: Action/Control</b>	<b>Responsibility</b>	<b>Timeframe</b>
The storage of flammable and combustible liquids such as oils will be in designated areas which are appropriately bunded, and stored in compliance with Material Safety Data Sheets (MSDS) files.	Contractor	Duration of contract
Any storage and disposal permits/approvals which may be required must be obtained, and the conditions attached to such permits and approvals will be compiled with.	Contractor	Duration of contract
Transport of all hazardous substances must be in accordance with the relevant legislation and regulations.	Contractor	Duration of contract
The sediment control and water quality structures used on-site must be monitored and maintained in an operational state at all times.	Contractor	Duration of contract
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.	Contractor	Construction
Precautions must be in place to limit the possibility of oil and other toxic liquids from entering the soil or clean stormwater system.	Contractor	Construction
As much material must be pre-fabricated and then transported to site to avoid the risks of contamination associated with mixing, pouring and the storage of chemicals and compounds on site.	Contractor	Construction
All chemicals and toxicants used during construction must be stored in bunded areas.	Contractor	Construction
All machinery and equipment should be inspected regularly for faults and possible leaks, these should be serviced off-site (pre-use inspection).	Contractor	Construction
All servicing and re-fuelling of machines and equipment must either take place off-site, or in controlled and bunded working areas.	Contractor	Construction
Have appropriate action plans on site, and training for contactors and employees in the event of spills, leaks and other potential impacts to the aquatic systems. All waste generated on-site during construction must be adequately managed.	Contractor	Construction
Should a chemical spill take place, an aquatic ecologist must be contracted to identify the extent of the impact and assist with additional mitigation measures.	Contractor	Construction
Minimise fuels and chemicals stored on site.	Contractor	Construction
Install bunds on storage areas and take other precautions to reduce the risk of spills.	Contractor	Construction
Implement a contingency plan to handle spills, so that environmental damage is avoided.	Contractor	Construction
No refuelling, servicing of plant/equipment or chemical substance storage allowed outside of designated areas.	Contractor	Construction
Drip trays should be used during all fuel/chemical dispensing.	Contractor	Construction
Drip trays to be placed beneath standing machinery/plant.	Contractor	Construction
In the case of petrochemical spillages, the spill should be collected immediately and stored in a designated area until it can be disposed of in accordance with the Hazardous Chemical Substances Regulations, 1995 (Regulation 15).	Contractor	Construction

Mitigation: Action/Control	Responsibility	Timeframe
Mitigation includes a regional (industrial area-wide) emergency response plan with involvement by the local authorities as well as alarms and communication systems which allow for fast and effective communication to neighbouring facilities such as the Mondi facility to the north. The area around the site is sparsely populated, so any impact would not be experienced by a large number of people.	Contractor	Construction

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» No chemical spills outside of designated storage areas.</li> <li>» No water or soil contamination by spills.</li> <li>» No complaints received regarding waste on site or indiscriminate dumping.</li> <li>» Safe storage of hazardous chemicals.</li> <li>» Proper waste management.</li> </ul>
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>» Observation and supervision of chemical storage and handling practices and vehicle maintenance throughout construction phase.</li> <li>» A complaints register must be maintained, in which any complaints from the community will be logged.</li> <li>» An incident reporting system will be used to record non-conformances to the EMPr.</li> <li>» On-going visual assessment to detect polluted areas and the application of clean-up and preventative procedures.</li> <li>» Monitor hydrocarbon spills from vehicles and machinery during construction continuously and record volume and nature of spill, location and clean-up actions.</li> <li>» Monitor maintenance of drains and intercept drains weekly.</li> <li>» Analyse soil samples for pollution in areas of known spills or where a breach of containment is evident when it occurs.</li> <li>» Records of accidental spills and clean-up procedures and the results thereof must be audited on an annual basis by the ECO.</li> <li>» Records of all incidents that caused chemical pollution must be kept and a summary of the results must be reported to management annually.</li> </ul>

### 6.3 Detailing Method Statements

**OBJECTIVE 14: 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:

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

Method Statements must be compiled for all activities which affect any aspect of the environment and should be applied consistently to all activities. Specific areas to be addressed in the method statement: pre, during and post construction include:

- » Site establishment (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.
- » Stipulate norms and standards for water supply and usage (i.e.: comply strictly to licence and legislation requirements and restrictions).
- » Storm water method statement.
- » 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.
- » Design, establish, maintain and operate suitable pollution control facilities necessary to prevent discharge of water containing polluting matter or visible suspended materials into the surrounding environment. Should grey water (i.e. water from basins, showers, baths, kitchen sinks etc.) need to be disposed of, link into an existing facility where possible. Where no facilities are available, grey water runoff must be controlled to ensure no seepage into the surrounding environment occurs.
- » Dust and noise pollution:
  - \* Describe the necessary measures to ensure that noise from construction activities is maintained within lawfully acceptable levels.
  - \* Procedure to control dust at all times on the site, access roads 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).
  - \* Lists of all potentially hazardous substances to be used.
  - \* Appropriate handling, storage and disposal procedures.
  - \* Prevention protocol of accidental contamination of soil at storage and handling areas.
  - \* All storage areas, (i.e. for harmful substances appropriately bunded with a suitable collection point for accidental spills must be implemented and drip trays underneath dispensing mechanisms including leaking engines/machinery).
- » Fire prevention and management measures on site.
- » Fauna and flora protection process on and off site (i.e. removal to reintroduction or replanting, if necessary).
  - \* Rehabilitation, re-vegetation process and bush clearing.
- » Incident and accident reporting protocol.
- » General administration.
- » Designate access road and the protocols while roads are in use.
- » Requirements on gate control protocols.

The Contractor may not commence the activity covered by the Method Statement until it has been approved by the Site Manager (with input from the ECO), 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.

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

**OBJECTIVE 15: 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 all personnel involved in the project are aware of the responsibilities in terms of the relevant environmental legislation and the contents of this EMPr. The ECO is responsible for monitoring compliance pre, during and post construction. 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 are to have copies of the relevant Method Statements and be aware of the contents 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.
- » Ensuring that, prior to commencing any site works, all employees and sub-contractors have attended an Environmental Awareness Training session. The training session must provide the site staff with an appreciation of the project's environmental requirements, and how they are to be implemented.
  - \* 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.
- » Awareness of any other environmental matters, which are deemed to be 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.

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:

#### **6.4.1 Environmental Awareness and Induction Training**

The EO, in consultation with the contractor, shall ensure that all construction workers receive an induction presentation, as well as on-going environmental education and awareness, on the importance and implications of the EMPr and the environmental requirements it prescribes. The presentation shall be conducted, as far as is possible, in the employees' language of choice. The contractor should provide a translator from their staff for the purpose of translating should this be necessary.

As a minimum, induction training should include:

- » Explanation of the importance of complying with the EMPr;
- » Explanation of the importance of complying with the Environmental Authorisation;
- » Discussion of the potential environmental impacts of construction activities;
- » Awareness regarding sensitivities on the site, including sensitive plant species (including the use of visual aids and on-site identification);
- » The benefits of improved personal performance;
- » Employees' roles and responsibilities, including emergency preparedness (this should be combined with this induction, but presented by the contractor's Health and Safety Representative);

- » Explanation of the mitigation measures that must be implemented when carrying out their activities; and
- » Explanation of the specifics of this EMPr and its specification (no-go areas, etc.).

Environmental Awareness Training must take the form of an on-site talk and demonstration by the EO/ECO before the commencement of site establishment and construction on site. The education/awareness programme should be aimed at all levels of management and construction workers within the contractor team. A record of attendance of this training must be maintained by the EO/ECO on site. Proof of awareness training should be kept on record. 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 be undertaken by the Contractor's Environmental Officer and should include discussing Hyperion Solar Development (Pty) Ltd'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 EO/ECO on site.

#### **6.4.2 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 ones recommended by the on site EO and the prevention of reoccurrence thereof. Records of attendance and the awareness talk subject must be kept on file.

#### **6.5 Monitoring Programme: Construction Phase**

##### ***OBJECTIVE 16: To monitor the performance of the control strategies employed against environmental objectives and standards***

A monitoring programme must be in place not only to ensure conformance with the EMPr, but also to monitor any environmental issues and impacts which have not been accounted for in the EMPr that are, or could result in significant environmental impacts for which corrective action is required. The period and frequency of monitoring will be stipulated by the Environmental Authorisation (once issued). Where this is not clearly dictated, the Developer will determine and stipulate the period and frequency of monitoring required in consultation with relevant stakeholders and authorities. The Technical Director/ Project Manager will ensure that the monitoring is conducted and reported.

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

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

All documentation e.g. audit/monitoring/compliance reports and notifications, required to be submitted to the DEA in terms of the Environmental Authorisation, must be submitted to the Director: Compliance Monitoring of the Department.

Records relating to monitoring and auditing must be kept on site and made available for inspection to any relevant and competent authority in respect of this development.

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

All supervisory staff including Foremen, 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.

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

#### **6.5.2. Monitoring Reports**

A monitoring report will be compiled by the ECO on a monthly basis and must be submitted to the Director: Compliance Monitoring at 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. The contractor must ensure that all waste manifests are provided to the ECO on a monthly basis in order to inform and update the DEA regarding waste related activities.

#### **6.5.3. Audit Reports**

The holder of the Environmental Authorisation must, for the period during which the Environmental Authorisation and EMPr remain valid, ensure that project compliance with the conditions of the Environmental Authorisation and the EMPr are audited, and that the audit reports are submitted to the Director: Compliance Monitoring of the DEA.

An environmental internal audit must be conducted and submitted every 3 months and an external audit must be conducted once a year. An annual audit report must be compiled and submitted to DEA until the completion of the construction and rehabilitation. This report must be compiled in accordance with Appendix

7 of the EIA Regulations, 2014, as amended, and 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.

#### **6.5.4. Final Audit Report**

A final environmental audit report must be compiled by an independent auditor and be submitted to DEA upon completion of the construction and rehabilitation activities. The report must be submitted within 30 days of completion of rehabilitation activities. This report must indicate the date of the audit, the name of the auditor and the outcome of the audit in terms of compliance with the environmental authorisation conditions and the requirements of the EMPr.



## CHAPTER 7: MANAGEMENT PROGRAMME: REHABILITATION

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

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

### 7.1. Objectives

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

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

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

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

Mitigation: Action/Control	Responsibility	Timeframe
Implement an appropriate Revegetation and Rehabilitation Plan.	Contractor	Following execution of the works
All temporary facilities, equipment, and waste materials must be removed from site as soon as construction is completed.	Contractor	Following execution of the works
All temporary fencing and danger tape must be removed once the construction phase has been completed.	Contractor	Following completion of construction activities in an area
Laydown areas and construction camps are to be checked for spills of substances such as oil, paint, etc. Any spills recorded must be cleaned up and the contaminated soil appropriately disposed of.	Contractor	Following completion of construction activities in an area
All voids must be backfilled. Any gullies or dongas must also be backfilled.	Contractor	Following completion of construction activities in an area

Mitigation: Action/Control	Responsibility	Timeframe
Where disturbed areas are not to be used during the operation of the thermal plant, these areas must be rehabilitated/re-vegetated with appropriate natural indigenous vegetation and/or local seed mix. A seed mix must be applied to rehabilitated and bare areas. No exotic plants must be used for rehabilitation purposes. No grazing must be permitted to allow for the recovery of the area.	Contractor in consultation with rehabilitation specialist	Following completion of construction activities in an area
The area must be shaped to a natural topography. Trees (or vegetation stands) removed must be replaced.	Contractor	Following completion of construction activities in an area
No planting or importing any listed invasive alien plant species (all Category 1a, 1b and 2 invasive species) to the site for landscaping, rehabilitation or any other purpose must be undertaken.	Contractor	Following completion of construction activities in an area
Temporary roads must be closed and access across these blocked. The temporary access roads must be rehabilitated.	Contractor	Following completion of construction activities in an area
Necessary drainage works and anti-erosion measures must be installed, where required, to minimise loss of topsoil and control erosion.	Contractor	Following completion of construction activities in an area
Topsoil from all excavations and construction activities must be salvaged and reapplied during reclamation. Soils must be replaced in the correct sequence / profile.	Contractor	Following completion of construction activities in an area
Re-vegetated areas may need to be protected from wind erosion and maintained until an acceptable plant cover has been achieved.	Proponent in consultation with rehabilitation specialist	Post-rehabilitation
Erosion control measures should be used in sensitive areas such as steep slopes, hills, and drainage systems if necessary.	Proponent in consultation with EO and rehabilitation specialist (if required)	Post-rehabilitation
On-going alien plant monitoring and removal must be undertaken on all areas of natural vegetation on an annual basis.	Proponent	Post-rehabilitation

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

## CHAPTER 8: OPERATION MANAGEMENT PROGRAMME

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**Overall Goal:** To ensure that the operation of the thermal plant and upgraded access road 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 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.

### 8.1. Objectives

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

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

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 thermal plant 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 Environment Forestry and Fisheries (DEFF) on environmental performance and other issues.
- » Conduct environmental training and awareness for the employees who operate and maintain the 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.

## OBJECTIVE 2: Limit the ecological footprint of the Thermal Facility

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

<b>Project Component/s</b>	<ul style="list-style-type: none"> <li>» Thermal Plant.</li> <li>» Access road.</li> <li>» Rehabilitated areas.</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Disturbance to or loss of vegetation and/or habitat in surrounding areas.</li> <li>» Environmental integrity of the site undermined resulting in reduced visual aesthetics, erosion, compromised land capability and the requirement for on-going management intervention.</li> <li>» Mortality and disturbance of avifauna within and beyond the footprint of the facility due to collisions with the thermal plant, presence of personnel and vehicle traffic</li> </ul>
<b>Activities/Risk Sources</b>	<ul style="list-style-type: none"> <li>» Human presence</li> <li>» Movement of vehicles to and from the site.</li> <li>» Presence of the thermal plant infrastructure and site fencing.</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» Maintain minimised footprints of disturbance of vegetation/habitats on-site.</li> <li>» Ensure and encourage plant regrowth in non-operational areas of post-construction rehabilitation.</li> </ul>

<b>Mitigation: Action/Control</b>	<b>Responsibility</b>	<b>Timeframe</b>
Rehabilitate disturbed areas should the previous attempt be unsuccessful.	Power Plant Manager	Operation
Access to adjacent areas to be strictly controlled.	Power Plant Manager	Operation
All vehicles accessing the site should adhere to a low speed limit (40km/h max) to avoid collisions with susceptible species such as snakes and tortoises.	Power Plant Manager	Operation
Maintain and augment natural vegetation around the proposed project	Power Plant Manager	Operation
Vegetation control should be by manual clearing and herbicides should not be used except to control alien plants in the prescribed manner.	Power Plant Manager	Operation
The use of herbicides and pesticides and other related horticultural chemicals should be carefully controlled and only applied by personnel adequately certified to apply pesticides and herbicides. It must be ensured that WHO Recommended Classification of Pesticides by Hazard Class 1a (extremely hazardous) or 1b (highly hazardous) are not purchased, stored or used on site along with any other nationally or internationally similarly restricted/banned products.	Power Plant Manager	Operation
Soil surfaces where no revegetation seems possible will have to be covered with gravel or small rock fragments to increase porosity	Power Plant Manager	Operation

Mitigation: Action/Control	Responsibility	Timeframe
of the soil surface, slow down runoff and prevent wind and water erosion.		
Any vegetation clearing that needs to take place as part of the maintenance activities must be done in an environmentally friendly manner, including avoiding the use of herbicides and using manual clearing methods wherever possible.	Power Plant Manager	Operation
If birds nesting on infrastructure cannot be tolerated due to operational risks, birds should be prevented from accessing nesting sites using exclusion methods. An avifaunal specialist should be consulted for advice on further mitigation if problems persist.	Power Plant Manager	Operation
If the site must be lit at night for security purposes, this should be done with downward-directed low-UV type lights (such as most LEDs), which do not attract insects.	Power Plant Manager	Operation
Maintenance of the perimeter fencing must ensure that it minimises impacts on species susceptible to entrapment.	Power Plant Manager	Operation
Vehicle movements must be restricted to designated access roads.	Power Plant Manager	Operation
All vehicles accessing the site should adhere to a low speed limit (40km/h max) to avoid collisions with susceptible species such nocturnal and crepuscular species.	Power Plant Manager	Operation
Existing roads must be maintained to ensure limited erosion and impact on areas adjacent to roadways.	Power Plant Manager	Operation
Maintain erosion control measures implemented during the construction phase (i.e. run-off attenuation on slopes (bags, logs), silt fences, storm water catch-pits, and shade nets).	Power Plant Manager	Operation
Develop and implement an appropriate stormwater management plan for the operation phase of the facility.	Power Plant Manager	Operation
Site access should be controlled and only authorised staff and contractors should be allowed on-site.	Power Plant Manager	Operation
No harvesting of plants for firewood, medicinal or any other purposes are to be permitted	Power Plant Manager	Operation
No killing and poaching of any wild animal to be allowed. This should be clearly communicated to all employees, including subcontractors.	Power Plant Manager	Operation
Any potentially dangerous fauna such as snakes or fauna threatened by the maintenance and operational activities must be removed to a safe location.	Power Plant Manager	Operation
An on-going alien plant monitoring and eradication programme must be implemented, where necessary.	Power Plant Manager	Operation
Annual site inspection for erosion or water flow regulation problems – with follow up remedial action where problems are identified.	Power Plant Manager	Operation

**Performance Indicator**

- » Limited soil erosion around site.
- » No further disturbance to vegetation or terrestrial faunal habitats.
- » Continued improvement of rehabilitation efforts.

	<ul style="list-style-type: none"> <li>» Removal to safety of entrapped/injured avifauna encountered during routine maintenance.</li> <li>» Low impact on nocturnal and crepuscular species along roads</li> </ul>
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>» Observation of vegetation on-site by environmental manager.</li> <li>» Regular inspections to monitor plant regrowth/performance of rehabilitation efforts and weed infestation compared to natural/undisturbed areas.</li> </ul>

**OBJECTIVE 3: Minimise the establishment and spread of alien invasive plants**

Major factors contributing to invasion by alien invader plants include high disturbance activities and negative grazing practices. Consequences of this may include:

- » Loss of indigenous vegetation;
- » Change in vegetation structure leading to change in various habitat characteristics;
- » Change in plant species composition;
- » Change in soil chemical properties;
- » Loss of sensitive habitats;
- » Loss or disturbance to individuals of rare, endangered, endemic, and/or protected species;
- » Fragmentation of sensitive habitats;
- » Change in flammability of vegetation, depending on alien species; and
- » Hydrological impacts due to increased transpiration and runoff.

<b>Project Component/s</b>	<ul style="list-style-type: none"> <li>» Thermal Plant</li> <li>» Access road.</li> <li>» Associated infrastructure.</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Invasion of natural vegetation surrounding the site by declared weeds or invasive alien species.</li> <li>» Impacts on soil.</li> <li>» Impact on faunal habitats.</li> <li>» Degradation and loss of agricultural potential.</li> </ul>
<b>Activities/Risk Sources</b>	<ul style="list-style-type: none"> <li>» Transport of LPG and other materials to site.</li> <li>» Movement of machinery and personnel.</li> <li>» Site preparation and earthworks causing disturbance to indigenous vegetation.</li> <li>» Construction of site access roads.</li> <li>» Stockpiling of topsoil, subsoil and spoil material.</li> <li>» Routine maintenance work – especially vehicle movement.</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» To significantly reduce the presence of weeds and eradicate alien invasive species.</li> <li>» To avoid the introduction of additional alien invasive plants to the site.</li> <li>» To avoid distribution and thickening of existing alien plants in the site.</li> <li>» To complement existing alien plant eradication programs in gradually causing a significant reduction of alien plant species throughout the site.</li> </ul>

<b>Mitigation: Action/Control</b>	<b>Responsibility</b>	<b>Timeframe</b>
Develop and implement an IAP Control and Eradication Programme.	Developer	Operation



Mitigation: Action/Control	Responsibility	Timeframe
Avoid creating conditions in which alien plants may become established: » Keep disturbance of indigenous vegetation to a minimum. » Rehabilitate disturbed areas as quickly as possible. » Do not import soil from areas with alien plants.	Developer	Operation
Annual monitoring for alien plant species - with follow up clearing as needed – or as per the frequency stated in the alien invasive management plan to be developed for the site. When alien plants are detected, these must be controlled and cleared using the recommended control measures for each species to ensure that the problem is not exacerbated or does not re-occur.	Developer	Operation
Eradicate all weeds and alien invasive plants as far as practically possible and ensure that material from invasive plants are adequately destroyed and not further distributed.	Developer	Operation
Any alien and invasive vegetation removed should be taken to a registered landfill site to prevent the proliferation of alien and invasive species	Developer	Operation
The use of herbicides and pesticides and other related horticultural chemicals should be carefully controlled and only applied by personnel adequately certified to apply pesticides and herbicides. It must be ensured that WHO Recommended Classification of Pesticides by Hazard Class 1a (extremely hazardous) or 1b (highly hazardous) are not purchased, stored or used on site along with any other nationally or internationally similarly restricted/banned products.	Developer	Operation

<b>Performance Indicator</b>	» Low abundance of alien plants. For each alien species: number of plants and aerial cover of plants within the site and immediate surroundings.
<b>Monitoring</b>	» On-going monitoring of area by EO during construction. » Annual audit of development footprint and immediate surroundings by qualified botanist. » If any alien invasive species are detected then the distribution of these should be mapped (GPS co-ordinates of plants or concentrations of plants), number of individuals (whole site or per unit area), age and/or size classes of plants and aerial cover of plants. » The results should be interpreted in terms of the risk posed to sensitive habitats within and surrounding the site. » The environmental manager/site agent should be responsible for driving this process. » Reporting frequency depends on legal compliance framework.

#### **OBJECTIVE 4: Minimise dust and air emissions**

During the operation phase the combustion of LPG to generate electricity will result in emissions including SO<sub>2</sub>, NO<sub>2</sub>, PM, CO, and VOCs. limited gaseous or particulate emissions are anticipated from exhaust emissions (i.e. from operational vehicles). Windy conditions and the movement of vehicles on site may lead to dust creation.

<b>Project Component/s</b>	<ul style="list-style-type: none"> <li>» Thermal Plant (LPG combustion)</li> <li>» Access road.</li> <li>» On-site vehicle movement.</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Dust and particulates from vehicle movement to and on-site.</li> <li>» Release of minor amounts of air pollutants (for example NO<sub>2</sub>, CO and SO<sub>2</sub>) from vehicles.</li> <li>» Release of criteria pollutants from combustion of LPG</li> </ul>
<b>Activities/Risk Sources</b>	<ul style="list-style-type: none"> <li>» Re-entrainment of deposited dust by vehicle movements.</li> <li>» Wind erosion from unsealed roads and surfaces.</li> <li>» Fuel burning vehicle engines.</li> <li>» LPG combustion for electricity generation</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» To ensure emissions from all vehicles are minimised, where possible.</li> <li>» To minimise nuisance to the community from dust emissions and to comply with workplace health and safety requirements.</li> <li>» Ensure emissions from the power generation process are minimised.</li> <li>» Ensure compliance with minimum emission limits as applicable to the LPG engines</li> <li>» Ensure compliance with acceptable dustfall standards along LPG delivery access route</li> </ul>

<b>Mitigation: Action/Control</b>	<b>Responsibility</b>	<b>Timeframe</b>
Implement appropriate dust suppression measures on a regular basis in any exposed surfaces.	Developer	Operation
Re-vegetation of cleared areas as soon as practically feasible.	Developer	Operation
Speed of vehicles must be restricted on site to 40km/hr.	Developer	Operation
Vehicles and equipment must be maintained in a road-worthy condition at all times.	Developer	Operation
Establish a complaints register and/or incident reporting system where personnel, communities and adjacent landowners can lodge complaints regarding construction activities. Ideal location would be security post at point of site access.	SHEQ and Plant Manager	Prior to commissioning
Regular maintenance and inspection of engines as per original equipment manufacturer requirements	EO and Plant Manager	Operation
Annual emissions monitoring campaign (as per conditions of the AEL), by independent contractor, on all engine stacks.	EO, Contractor and Plant Manager	Operation
Annual emissions reporting (as per conditions of the AEL)	EO, Contractor and Plant Manager	Operation
Once per year a 7-day ambient monitoring campaign at (minimum) 4 fence-line locations using passive sampling techniques. Monitoring of SO <sub>2</sub> , NO <sub>2</sub> , CO, and VOCs	EO, Contractor and Plant Manager	Operation
Appropriate dust suppression measures on access road, including regularly sweeping and or wet suppression, to minimise particulate matter build-up, especially near homesteads along access road.	EO and Plant Manager	Operation
LPG delivery tanker trucks to be road worthy and regularly maintained. Tanker trucks to comply with Euro V emission limits or better.	LPG distribution contractor, transportation contractor(s) and EO	Operation
All vehicles associated with the delivery of LPG during the operational phase must adhere to the designated speed limits on- and off-site.	LPG distribution contractor,	Operation

Mitigation: Action/Control	Responsibility	Timeframe
	transportation contractor(s) and EO	
Investigate inadequate mitigation and control measures if monitoring or complaints potential issues are indicated by non-conformance with performance indicators	EPC Contractor(s) and EO	Operation

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» No complaints from affected residents or community regarding dust or vehicle emissions.</li> <li>» Dust suppression measures implemented where required.</li> <li>» Drivers made aware of the potential safety issues and enforcement of strict speed limits when they are employed.</li> </ul>
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>» Immediate reporting by personnel of any potential or actual issues with nuisance or dust to the Power Station Manager.</li> <li>» 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.</li> <li>» An incident reporting system must be used to record non-conformances to the EMPr.</li> </ul>

**OBJECTIVE 5: Ensure the implementation of an appropriate fire management plan and general management measures during the operation phase**

The following recommendations below must be considered with regards to fire protection on site:

- » Emergency response arrangements and systems, such as alarms to allow for personnel to muster in case of emergency
- » Alien Invasive species should be completely eradicated in order to decrease the fire risk associated with the site.
- » Cigarette butts may not be thrown in the veld, but must be disposed of correctly. Designated smoking areas must be established with suitable receptacles for disposal.
- » In case of a fire outbreak, contact details of the local fire and emergency services must be readily available.
- » Contractors must ensure that basic firefighting equipment is available on site as per the specifications defined by the health and safety representative / consultant.
- » The fire risk on site is a point of discussion that must take place as part of the environmental induction training prior to commencement of construction.
- » The contractor must also comply with the requirements of the Occupational Health and Safety Act with regards to fire protection.

The following below can be used as a guide for appropriate fire management (also refer to **Appendix J**):

<b>Project Component/s</b>	» Operation and maintenance of the thermal and associated infrastructure.
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Veld fires can pose a personal safety risk to local farmers and communities, and their homes, crops, livestock and farm infrastructure, such as gates and fences. In addition, fire can pose a risk to the thermal facility infrastructure.</li> <li>» Loss of containment of LPG resulting in fireball event</li> </ul>

<b>Activities/Risk Sources</b>	<ul style="list-style-type: none"> <li>» The presence of operation and maintenance personnel and their activities on the site can increase the risk of veld fires.</li> <li>» LPG installations</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» Maintenance procedures to prevent the occurrence of a catastrophic loss of containment from corrosion</li> <li>» To avoid and or minimise the potential risk of veld fires on local communities and their livelihoods.</li> </ul>

Mitigation: Action/Control	Responsibility	Timeframe
Provide adequate firefighting equipment on site and establish a fire-fighting management plan during operation.	O&M Contractor	Operation
Ensure that emergency systems, such as alarms are installed	O&M Contractor	Operation
Provide fire-fighting training to selected operation and maintenance staff.	O&M Contractor	Operation
Ensure that appropriate communication channels are established to be implemented in the event of a fire.	O&M Contractor	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.).	Contractor	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.	O&M Contractor	Operation
Contact details of emergency services should be prominently displayed on site.	O&M Contractor	Operation
Road borders must be regularly maintained to ensure that vegetation remains short and that they therefore serve as an effective firebreak.	O&M Contractor	Operation

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» Firefighting equipment and training provided before the operation phase commences.</li> <li>» Appropriate fire breaks in place.</li> </ul>
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>» The O&amp;M operator must monitor indicators listed above to ensure that they have been met.</li> </ul>

**OBJECTIVE 6: Maximise local employment, skills development and business opportunities associated with the operation phase**

<b>Project Component/s</b>	<ul style="list-style-type: none"> <li>» Operation and maintenance activities associated with the facility.</li> <li>» Availability of required skills in the local communities for the undertaking of the construction activities.</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» The opportunities and benefits associated with the creation of local employment and business should be maximised.</li> </ul>
<b>Activities/Risk Sources</b>	<ul style="list-style-type: none"> <li>» Limited use of local labour, thereby reducing the employment and business opportunities for locals.</li> <li>» Sourcing of individuals with skills similar to the local labour pool outside the municipal area.</li> <li>» Unavailability of locals with the required skills resulting in locals not being employed and labour being sourced from outside the municipal area.</li> <li>» Higher skilled positions might be sourced internationally, where required.</li> </ul>

<b>Enhancement: Target/Objective</b>	<ul style="list-style-type: none"> <li>» The Developer 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.</li> <li>» Employment of a maximum number of the low-skilled and/or semi-skilled workers from the local area where possible.</li> <li>» Appropriate skills training and capacity building.</li> </ul>
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Mitigation: Action/Control	Responsibility	Timeframe
Where feasible, effort must be made to employ locally in order to create maximum benefit for the communities.	Developer	Operation
In order to maximise the positive impact, it is suggested that the Developer provide training courses for employees where feasible to ensure that employees gain as much as possible from the work experience.	Developer	Operation
Facilitate the transfer of knowledge between experienced employees and the staff.	Developer	Operation
Perform a skills audit to determine the potential skills that could be sourced in the area.	Developer	Operation
Effort should be made to use locally sourced inputs where feasible in order to maximize the benefit to the local economy. Local Small and Medium Enterprises are to be approached to investigate the opportunities for supplying inputs required for the construction of the facility, as far as feasible.	Developer	Operation
Local Small and Medium Enterprises are to be approached to investigate the opportunities for supplying inputs required for the maintenance and operation of the facility, as far as feasible	Developer	Operation

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» Job opportunities, especially of low to semi-skilled positions, are primarily awarded to members of local communities as appropriate.</li> <li>» Locals and previously disadvantaged individuals (including women) are considered during the hiring process.</li> <li>» Labour, entrepreneurs, businesses, and SMMEs from the local sector are awarded jobs, where possible, based on requirements in the tender documentation.</li> <li>» The involvement of local labour is promoted.</li> <li>» Reports are not made from members of the local communities regarding unrealistic employment opportunities or that only outsiders were employed.</li> <li>» Employment and business policy document that sets out local employment and targets is completed before the construction phase commences.</li> <li>» Skills training and capacity building initiatives are developed and implemented.</li> </ul>
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>» Developer must keep a record of local recruitments and information on local labour to be shared with the ECO for reporting purposes.</li> </ul>

**OBJECTIVE 6: Minimise impacts related to traffic management**

<b>Project Component/s</b>	<ul style="list-style-type: none"> <li>» Operation and maintenance vehicles.</li> <li>» LPG delivery for operation of thermal plant</li> </ul>
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<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Impact of vehicles on road surfaces, and possible increased risk in accidents involving people and animals.</li> <li>» Deterioration of road pavement conditions (both surfaced and gravel road) due to abnormal loads.</li> </ul>
<b>Activities/Risk Sources</b>	<ul style="list-style-type: none"> <li>» Operation and maintenance vehicle movement.</li> <li>» Speeding on local roads.</li> <li>» Degradation of local road conditions.</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» Minimise impact of traffic associated with the operation and maintenance of the facility on local traffic volumes, existing infrastructure, property owners, animals, and road users.</li> <li>» To minimise potential for negative interaction between pedestrians or sensitive users and traffic associated with the facility construction.</li> <li>» To ensure all vehicles are roadworthy and all materials/equipment are transported appropriately and within any imposed permit/licence conditions.</li> <li>» To minimise traffic congestion by staggering LPG deliveries</li> </ul>

<b>Mitigation: Action/Control</b>	<b>Responsibility</b>	<b>Timeframe</b>
Ensure that, at all times, people have access to their properties as well as to social facilities.	Developer	Operation
Vehicles used for operation and maintenance purposes should be inspected regularly to ensure their road-worthiness.	Developer	Operation
Strict vehicle safety standards should be implemented and monitored.	Developer	Operation
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.	Developer	Operation
Road signage and road markings in the vicinity of the site should be well maintained to enhance road safety.	Developer	Operation
Road signage and road markings in the vicinity of the site should be well maintained to enhance road safety.	Developer	Operation
Provide clearly defined roadway, parking and pedestrian walkway areas with adequate lighting	Developer	Operation
The access security gate and guardhouse should be set back at least 40 m from Western Arterial to accommodate vehicles stacking outside the gate, and protocols need to be in place to obviate vehicles stacking into Western Arterial whilst ensuring site safety and security requirements are met.	Developer	Operation
Staff and general trips to the site should occur outside of peak traffic periods.	O&M Contractor	Operation
LPG deliveries should be restricted to off-peak periods or staggered to avoid traffic congestion	Appointed fuel delivery contractor	Operation

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» Vehicles keeping to the speed limits.</li> <li>» Vehicles are in good working order and safety standards are implemented.</li> <li>» Local residents and road users are aware of vehicle movements and schedules.</li> <li>» Local road conditions and road surfaces are up to standard.</li> <li>» Complaints of residents are not received (e.g. concerning the speeding of heavy vehicles)</li> <li>» Minimal traffic congestion due to LPG deliveries</li> </ul>
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<b>Monitoring</b>	» Environmental manager must monitor indicators listed above to ensure that they have been implemented.
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**OBJECTIVE 7: Appropriate handling and management of hazardous substances, waste and dangerous goods**

The operation of the thermal facility will involve the storage of chemicals and hazardous substances (e.g. LPG), as well as the generation of limited waste products. The main wastes expected to be generated by the operation activities includes general solid waste, hazardous waste and sewage waste.

<b>Project Component/s</b>	» Thermal Plant. » Associated infrastructure.
<b>Potential Impact</b>	» 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. » Loss of containment of LPG resulting in flash fires event
<b>Activity/Risk Source</b>	» LPG installations » Thermal plant supporting equipment. » Workshop / control room.
<b>Mitigation: Target/Objective</b>	» 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 area.	Developer	Operation
Mounted LPG storage bullets must meet specifications of SANS 10087	Developer	Operation and maintenance
Spill kits must be made available on-site for the clean-up of spills and leaks of contaminants.	Developer	Operation and maintenance
Storage areas for hazardous substances must be appropriately sealed and bunded.	Developer	Operation
Under no circumstances shall rubble, earth or other material be dumped within the servitude restriction area. The developer shall maintain the area concerned to Eskom's satisfaction. The developer shall be liable to Eskom for the cost of any remedial action which has to be carried out by Eskom.	Developer	Operation
All hazardous materials should be stored in the appropriate manner to prevent contamination of the site. Any accidental chemical, fuel and oil spills that occur at the site should be cleaned up in the appropriate manner as related to the nature of the spill.	Developer	Operation

Mitigation: Action/Control	Responsibility	Timeframe
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.	Developer	Operation
Care must be taken to ensure that spillage of oils and other hazardous substances are limited during maintenance. Handling of these materials should take place within an appropriately sealed and bunded area. Should any accidental spillage take place, it must be cleaned up according to specified standards regarding bioremediation.	Developer	Operation and maintenance
Disposal of waste must be in accordance with relevant legislative requirements, including the use of licensed contractors.	Developer	Operation
All food waste and litter at the site should be placed in bins with lids and removed from the site on a regular basis.	Developer	Operation
Waste handling, collection, and disposal operations must be managed and controlled by a waste management contractor.	Developer	Operation
All sewage disposal to take place at a registered and operational wastewater treatment works. Proof of disposal to be retained as proof of responsible disposal.	Developer	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.	Developer	Operation
General waste must be recycled where possible or disposed of at an appropriately licensed landfill.	Developer	Operation
Hazardous waste (including hydrocarbons) and general waste must be stored and disposed of separately.	Developer	Operation
All servicing and re-fuelling of machines and equipment must either take place off-site, or in controlled and bunded working areas.	Developer	Operation
Separation and recycling of different waste materials should be supported.	Developer	Operation
Should a chemical spill take place, an aquatic ecologist must be contracted to identify the extent of the impact and assist with additional mitigation measures.	Developer	Operation
Immediately report significant spillages and initiate an environmental site assessment for risk assessment and remediation if necessary.	Developer	Operation
Regular quality monitoring of waste before discharge.	Developer	Operation
The dirty water dam will need to be lined to prevent any seepage of waste water.	Developer	Operation
Emergency response arrangements and systems such as foam pourers, fire-fighting systems and cooperation with emergency responders. Preventive measures could include maintenance procedures to prevent the occurrence of a catastrophic loss of containment, as well as strict control of ignition sources and other	Developer	Operation

<b>Mitigation: Action/Control</b>	<b>Responsibility</b>	<b>Timeframe</b>
measures which may be required according to standards such as those prescribed by the South African National Standards system.		
<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» No complaints received regarding waste on site or indiscriminate dumping.</li> <li>» Internal site audits identifying that waste segregation recycling and reuse is occurring appropriately.</li> <li>» Provision of all appropriate waste manifests.</li> <li>» No contamination of soil or water.</li> </ul>	
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>» Waste collection must be monitored on a regular basis.</li> <li>» Waste documentation must be completed and available for inspection.</li> <li>» An incidents/complaints register must be maintained, in which any complaints from the community must be logged.</li> <li>» Complaints must be investigated and, if appropriate, acted upon.</li> <li>» Regular reports on exact quantities of all waste streams exiting the site must be compiled by the waste management contractor and monitored by the O&amp;M operator.</li> <li>» All appropriate waste disposal certificates accompany the monthly reports.</li> </ul>	

## **CHAPTER 9: MANAGEMENT PROGRAMME: DECOMMISSIONING**

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The lifespan of the proposed thermal generation facility will be at least 20 years from date of commissioning. Equipment associated with this facility would only be decommissioned once it has reached the end of its economic life or if it is no longer required. An upgrade of the thermal generation facility technology could be possible after the initial 20 year operational life should an extension of operational life be required as the gas engines and turbines are common to have longer operational lives than 20 years.

It is most likely that decommissioning activities of the infrastructure of the facility would comprise the disassembly and disposal of the infrastructure. Decommissioning activities will involve disassembly of the production units and ancillary infrastructure, demolishing of buildings, fuel storage tanks and removal of waste from the site and rehabilitation to the desired end-use. A new permitting process will be undertaken to assess the decommissioning phase as per the legislation requirements at the time.

Future use of the site after decommissioning of the thermal generation facility could possibly form part of another energy generating project of an alternative industry that would be able to utilise some of the existing infrastructure associated with the thermal generation facility. This would however be dependent on the development plans of the area at the time.

*The relevant mitigation measures contained under the construction section should be applied during decommissioning and therefore are not repeated in this section.*

### **9.1. Objectives**

Within a period of at least 12 months prior to the decommissioning of the site, a Decommissioning Method Statement must be prepared and submitted to the Local Planning Authority, as well as the Provincial and National Environmental Authority. This method statement must cover site restoration, soil replacement, landscaping, conservation, and a timeframe for implementation. Furthermore, this decommissioning must comply with all relevant legal requirements administered by any relevant and competent authority at that time.

The objectives of the decommissioning phase of the proposed project are to:

- » Follow a process of decommissioning that is progressive and integrated into the short- and long-term project plans that will assess the closure impacts proactively at regular intervals throughout project life.
- » Implement progressive rehabilitation measures, beginning during the construction phase.
- » Leave a safe and stable environment for both humans and animals and make their condition sustainable.
- » Return rehabilitated land-use to a standard that can be useful to the post-project land user.
- » Where applicable, prevent any further soil and surface water contamination by maintaining suitable storm water management systems.
- » Maintain and monitor all rehabilitated areas following re-vegetation, and if monitoring shows that the objectives have been met, apply for closure.

### **9.2. Approach to the Decommissioning Phase**

It is recommended that planning of the decommissioning of the project and rehabilitation of the site should take place well in advance (at least two years) of the planned decommissioning activities. Important factors that need to be taken into consideration are detailed below.

Two possible scenarios for this decommissioning phase are detailed below:

### **SCENARIO 1: TOTAL DECOMMISSIONING OF THERMAL PLANT.**

If the decision is taken at the end of the project lifespan to totally decommission the facility, i.e. make the land available for an alternative land use, the following should take place:

- » All concrete and imported foreign material must be removed from the thermal plant i.e. engines, stacks, support structures etc.
- » Infrastructure not required for the post-decommissioning use of the site must be removed and appropriately disposed of.
- » Access roads and servitudes not required for the post-decommissioning use of the site must be rehabilitated. If necessary, an ecologist should be consulted to give input into rehabilitation specifications.
- » Tracks that are to be utilised for the future land use operations should be left *in-situ*. The remainder of the tracks to be removed (ripped) and topsoil replaced.
- » All ancillary buildings and access points are to be removed unless they can be used for the future land use.
- » Underground electric cables are to be removed if they cannot be used in the future land use.
- » All material (cables, gas engines etc.) must be re-used or recycled wherever possible.
- » The competent authority may grant approval to the owner not to remove the landscaping and underground foundations.
- » The site must be seeded with locally sourced indigenous vegetation (unless otherwise dictated by the future land use) to allow revegetation of the site.
- » Monitor rehabilitated areas quarterly for at least three years (expected) following decommissioning, and implement remedial action as and when required.

### **SCENARIO 2: PARTIAL DECOMMISSIONING OF ENERGY FACILITY.**

Should more advanced technology become available it may be decided to continue to use the site as a thermal facility. Much of the existing infrastructure is likely to be re-used in the upgraded facility. In this case, all infrastructure that will no longer be required for the upgraded facility must be removed as described for Scenario 1. The remainder of the infrastructure should remain in place or upgraded depending on the requirements of the new facility. Any upgrades to the facility at this stage must comply with relevant legislation.

#### **9.2.1. Identification of structures for post-closure use**

Access roads should be assessed in conjunction with the future land users to determine if these could be used. Where not required, these access roads should be decommissioned and rehabilitated.

#### **9.2.2. Removal of infrastructure**

All infrastructure must be dismantled and removed. Inert material must be removed from site and disposed of at a suitably registered landfill site. The thermal plant components must be removed and recycled where possible or disposed of at a suitably registered landfill site. All foundations must be removed to a depth of 1m. Hard surfaces must be ripped to a depth of 1m and vegetated.

### **9.2.3. Soil rehabilitation**

The steps that should be taken during the rehabilitation of soils are as follows:

- » The deposited soils must be ripped to ensure reduced compaction;
- » An acceptable seed bed should be produced by surface tillage;
- » Restore soil fertility;
- » Incorporate the immobile fertilisers in to the plant rooting zone before ripping; and
- » Apply maintenance dressing of fertilisers on an annual basis until the soil fertility cycle has been restored.

### **9.2.4. Establishment of vegetation**

The objective is to restore the project site to a self-sustaining cycle, i.e. to realise the re-establishment of the natural nutrient cycle with ecological succession initiated.

The objectives for the re-vegetation of reshaped and top-soiled land are to:

- » Prevent erosion;
- » Restore the land to the agreed land capability;
- » Re-establish eco-system processes to ensure that a sustainable land use can be established without requiring fertilizer additions; and
- » Restore the biodiversity of the area as far as possible.

### **9.2.5. Maintenance**

Established vegetation requires regular maintenance. If the growth medium consists of low-fertility soils, then regular maintenance will be required until the natural fertility cycle has been restored.

### **9.2.6. Monitoring**

The purpose of monitoring is to ensure that the objectives of rehabilitation are met and that the rehabilitation process is followed. The physical aspects of rehabilitation should be carefully monitored during the progress of establishment of desired final ecosystems.

The following items should be monitored continuously:

- » Erosion status;
- » Vegetation species diversity; and
- » Faunal re-colonisation.

# Thermal Dual Fuel Facility at Hyperion PV SEF Northern Cape

## Layout Map

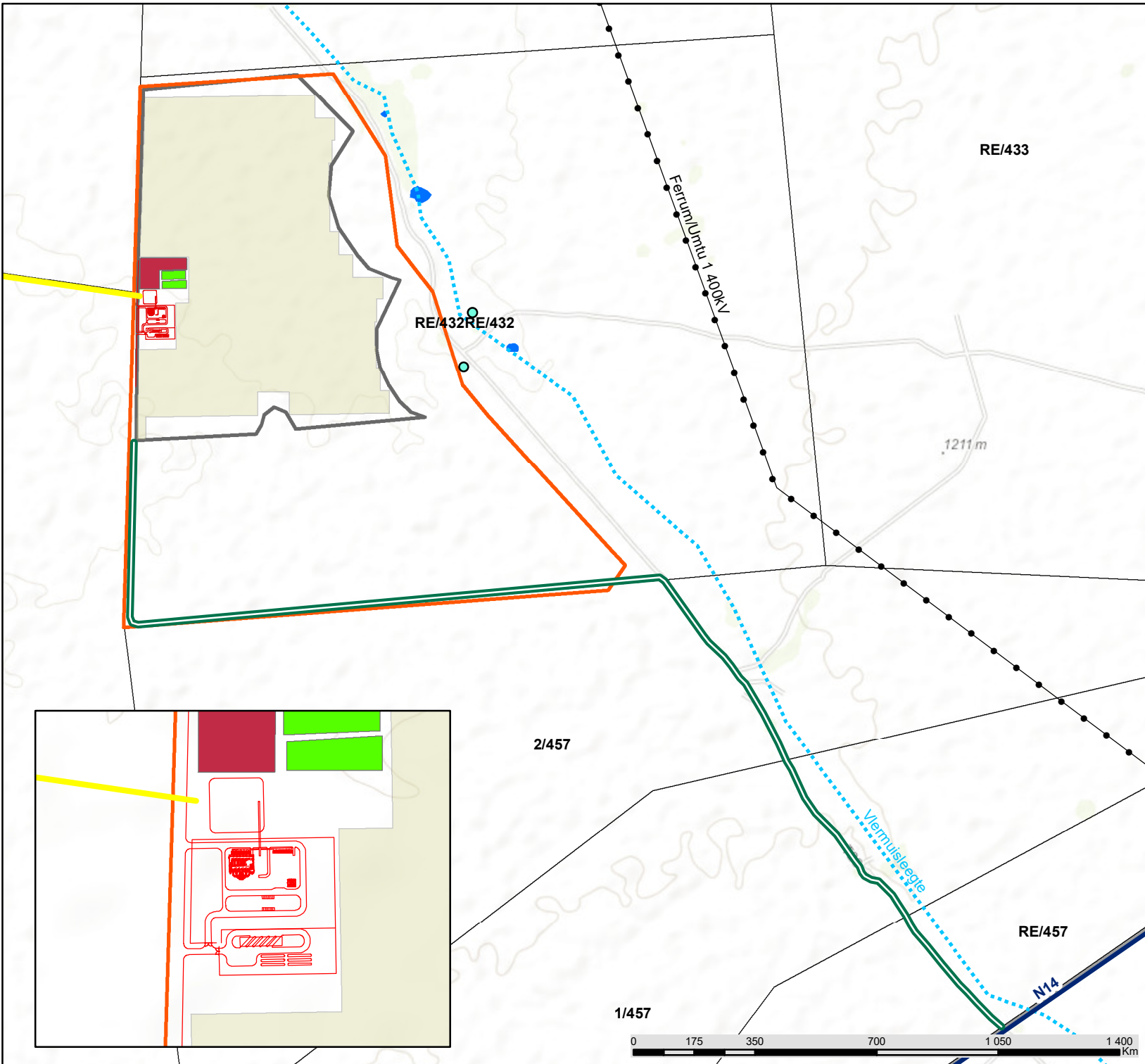
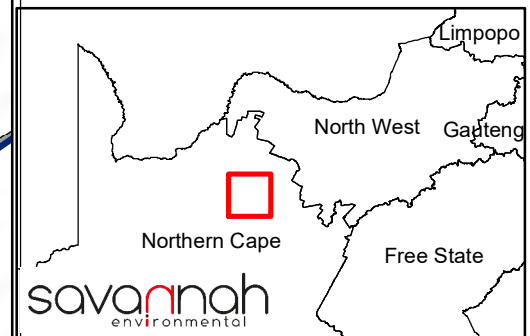
### Legend

- Borehole
- Proposed Thermal Power Plant
- Proposed Access Road
- Existing Power Line
- National Route
- - - Non-perennial River
- Proposed 132kV Hyperion-Kalbas OHL (seperate authorisation)
- NFEPA Wetland
- Farm Portion

### Authorised Hyperion PV SEF

- Energy Storage
- Hyperion Area
- Laydown Area
- Hyperion PV Solar Field

Scale: 1: 35 000  
 Projection: LO23  
 Ref: Hyperion Dual Fuel Thermal Facility Layout


















# Thermal Dual Fuel Facility at Hyperion PV SEF Northern Cape

## Sensitivity Map




### Legend

-  Borehole
-  Proposed Tar Access Road
-  Existing Power Line
-  National Route
-  Main Road
-  Authorised Hyperion PV SEF
-  Proposed Thermal Dual Fuel Plant (5 ha)
-  Farm Portion

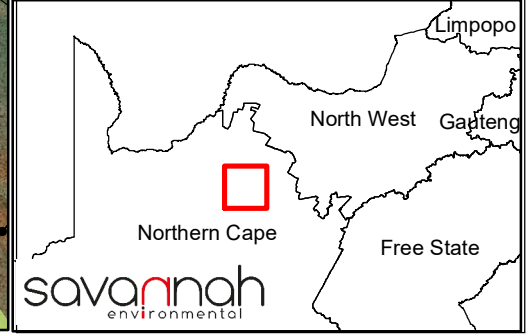
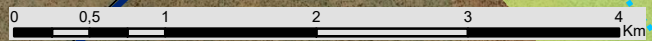
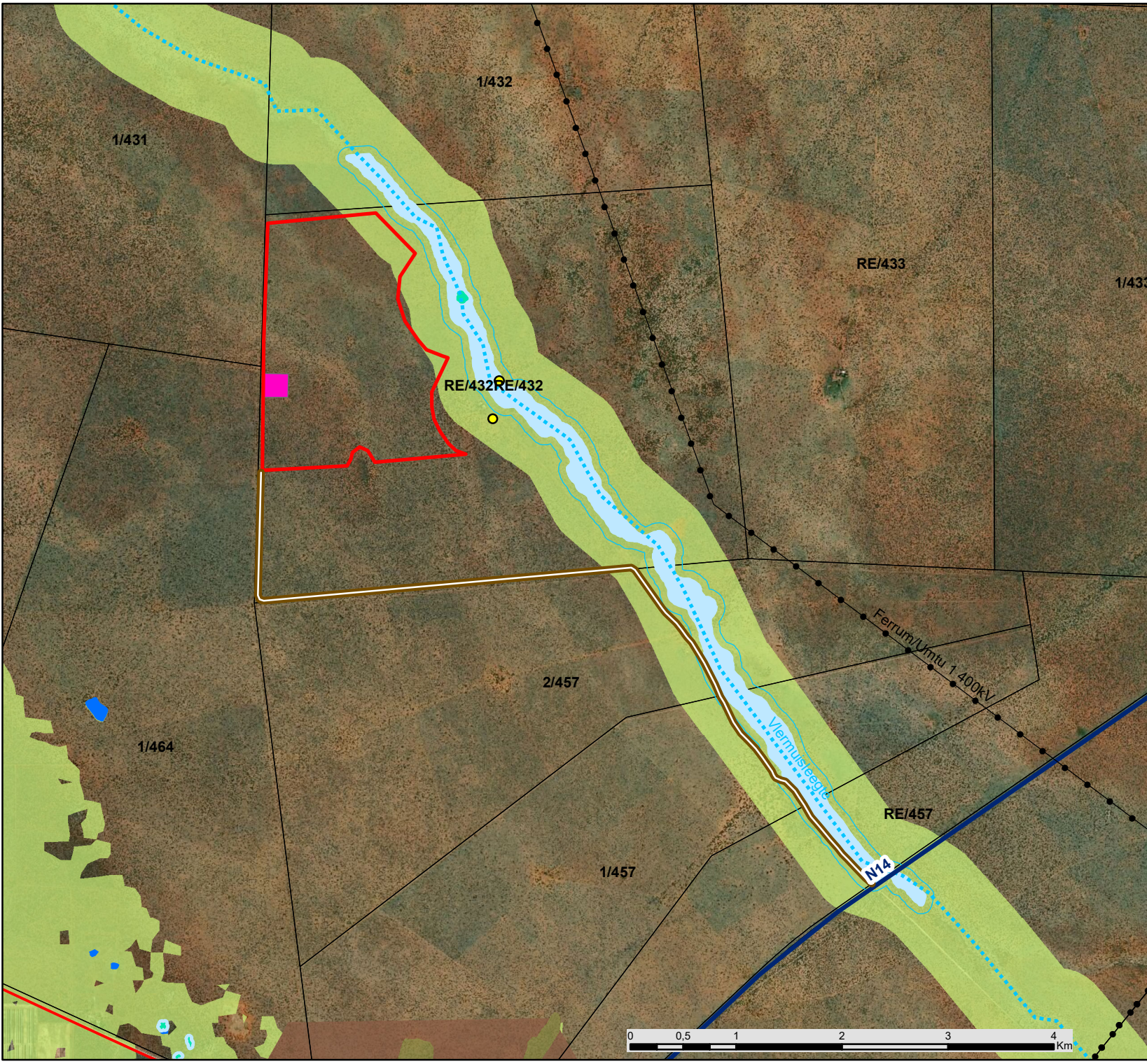
### Sensitive Environmental Features

-  Non-perennial River
-  Pan wetlands
-  100m GN509 Zone of Regulation
-  32m NEMA Zone of Regulation
-  NFEPA Wetland

### Critical Biodiversity Areas

-  CBA 1
-  CBA 2
-  ESA

Scale: 1: 50 000  
 Projection: LO23  
 Ref: Hyperion Dual Fuel Thermal Facility Sensitivity





## Appendix (B) - Grievance Mechanisms

## **GRIEVANCE MECHANISM / PROCESS**

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### **PURPOSE**

This Grievance Mechanism has been developed to receive and facilitate the resolution of concerns and grievances regarding the project's environmental and social performance. The aim of the Grievance Mechanism is to ensure that grievances or concerns raised by stakeholders are addressed in a manner that:

- » Provides a predictable, accessible, transparent, and credible process to all parties, resulting in outcomes that are fair and equitable, accountable and efficient.
- » Promotes 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 provide a process to address grievances in a manner that does not require a potentially costly and time-consuming legal process.

### **PROCEDURE FOR RECEIVING AND RESOLVING GRIEVANCES**

The following proposed grievance procedures are to be complied with throughout the construction, operation and decommissioning phases of the project. These procedures should be updated as and when required to ensure that the Grievance Mechanism is relevant for the project and effective in providing the required processes.

- » Local landowners, communities and authorities must be informed in writing by the Developer of the grievance mechanism and the process by which grievances can be brought to the attention of the Developer through its designated representative. This must be undertaken with the commencement of the construction phase.
- » A company representative must be appointed as the contact person to which grievances can be directed. The name and contact details of the contact person must be provided to local landowners, communities and authorities when requested.
- » Project related grievances relating to the construction, operation and or decommissioning phases 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, by recording grievances and completing written grievance notices where applicable, translating requests or concerns or by facilitating contact with relevant parties who can address the raised concerns. The following information should be obtained, as far as possible, regarding each written grievance, which may act as both acknowledgement of receipt as well as record of grievance received:
  - a. The name and contact details of the complainant;
  - b. The nature of the grievance;
  - c. Date raised, received, and for which the meeting was arranged;
  - d. Persons elected to attend the meeting (which will depend on the grievance); and
  - e. A clear statement that the grievance procedure is, in itself, not a legal process. Should such avenues be desired, they must be conducted in a separate process and do not form part of this grievance mechanism.

- » 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, if required, 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 and only if required).
- » A grievance register must be kept on site (in electronic format, so as to facilitate editing and updating), and shall be made available to all parties wishing to gain access thereto.
- » 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, as well as a suitable venue. The people who will be required to attend the meeting will depend on the nature of the grievance. While the Complainant and or Developer are entitled to invite their legal representatives to attend the meeting/s, it should be made clear to all the parties involved in the process that the grievance mechanism process is not a legal process, and that if the Complainant invites legal representatives, the cost will be their responsibility. It is therefore recommended that the involvement of legal representatives be limited as far as possible, as a matter of last resort, and that this process be primarily aimed at stakeholder relationship management as opposed to an arbitration or litigation mechanism.
- » The meeting should be chaired by the Developer's representative appointed to address grievances. The Developer must supply and nominate a representative to capture minutes and record the meeting/s.
- » Draft copies of the minutes must be made available to the Complainant and the Developer within 5 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 5 working days of receipt of the draft minutes.
- » The meeting agenda must be primarily the discussion of the grievance, avoidance and mitigation measures available and proposed by all parties, as well as a clear indication of the future actions and responsibilities, in order to put into effect the proposed measures and interventions to successfully resolve the grievance.
- » 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 Developer 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 Developer 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 Developer, must identify the preferred mediator and agree on a date for the next meeting. The cost of the mediator must be borne by the Developer. The Developer must supply and nominate a representative to capture minutes 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 summaries 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 Developer for comment before being finalised and signed by all parties, which signature may not be unreasonably withheld by either party. Unless otherwise agreed, comments on the draft report must be forwarded to the company representative appointed to manage the grievance mechanism within 5 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 is required, or indeed possible. Closure status must be classified and captured following mediation or successful resolution 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 despite mediation.
- » 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 Developer, either party may be entitled to legal action if an appropriate option, however, this grievance mechanisms aims to avoid such interactions by addressing the grievances within a short timeframe, and to mutual satisfaction, where possible.

Appendix (C) - Alien Plant & Open Space MP

# ALIEN PLANT AND OPEN SPACE MANAGEMENT PLAN

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## 1. PURPOSE

Invasive alien plant species pose the second largest threat to biodiversity after direct habitat destruction. The purpose of this Alien Plant and Open Space Management Plan is to provide a framework for the management of alien and invasive plant species during the construction and operation of the Thermal Plant and upgraded access road. The broad objectives of the plan include the following:

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

This plan should be updated throughout the life-cycle of the project, as required in order to ensure that appropriate measures are in place to manage and control the establishment of alien and invasive plant species and to ensure compliance with relevant legislation. This plan should be implemented with specific focus on sensitive areas.

## 2. 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 alien plant species must be effectively controlled. Landowners are legally responsible for the control of invasive alien plants on their properties. In terms of this Act alien invasive plant species are 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 NEM:BA. 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 Category 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 Category 3 plants to exist in riparian zones.

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

It is important to note that alien plant 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.

### **3. ALIEN PLANT MANAGEMENT PRINCIPLES**

#### **3.1. 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 already on site, as well as those that are introduced to the site by the construction activities. 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 additional 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 (where permissible only) should be planned. It is, however, better to monitor regularly and act swiftly than to allow invasive alien plants to become established on site.

#### **3.2. 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 uses of chemicals are not recommended for any wetland areas. Herbicides should be applied directly to the plant and not to the soil. 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.

### 3.3. General Clearing and Guiding Principles

Alien species control programmes are long-term management projects and should consist of 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 alien species are easily dispersed across boundaries by wind or watercourses. 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 and that they are appropriate to the specific species of concern. As such, regardless of the methods used, disturbance to the soil should be kept to a minimum.

Fire should not be used for alien species 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 a 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 plant invasion and may also be ineffective for many woody species which re-sprout. 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 at 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.
- \* The use of chemicals is not recommended for wetland areas.

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 of 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 plant's 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.

### **3.4. General management practices**

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

- » Establish an on-going monitoring programme for construction phase to detect and quantify any alien species that may become established.
- » Alien vegetation regrowth on areas disturbed by construction must be immediately controlled.
- » 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 herbicides 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 plant 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. 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 plant 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 alien plants identified should be cleared using appropriate means.

### 3.5. Monitoring

In order to assess 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 an assessment of the magnitude of alien plant invasion on site, as well as an assessment of the efficacy 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**

<b>Monitoring Action</b>	<b>Indicator</b>	<b>Timeframe</b>
Document alien species present at the site	List of alien plant species	Preconstruction Monthly during Summer and Autumn (Middle November to end March) 3 Monthly during Winter and Spring
Document alien plant distribution	Alien plant distribution map within priority areas	3 Monthly
Document & record alien plant control measures implemented	Record of clearing activities	3 Monthly

**Operation Phase**

<b>Monitoring Action</b>	<b>Indicator</b>	<b>Timeframe</b>
Document alien plant 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 (D) - Plant Rescue & Protection Plan

# SEARCH AND RESCUE AND PROTECTION PLAN

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## 1. PURPOSE

The purpose of the Search and Rescue and Protection Plan is to implement avoidance and mitigation measures, in addition to the mitigations included in the EMP to reduce the impact of thermal plant and upgraded access road on listed and protected plant species and their habitats during construction and operation. This subplan is required in order to ensure compliance with national and provincial legislation for vegetation clearing and any required destruction or translocation of provincially and nationally protected species within the development footprint.

The Plan first provides some legislative background on the regulations relevant to listed and protected species, under the Northern Cape Conservation Act (2009) and trees protected under the National List of Protected Tree Species. This is followed by an identification of protected species present at the Hyperion site and actions that should be implemented to minimise impact on these species and comply with legislative requirements.

## 2. IDENTIFICATION OF SPECIES OF CONSERVATION CONCERN

Plant species are protected at the national level as well as the provincial level and different permits may be required for different species depending on their protection level. At the national level, protected trees are listed by the Department of Environment, Forestry and Fisheries (DEFF) under the National List of Protected Trees, which is updated on a regular basis. Any clearing of nationally protected trees requires a permit from DEFF. At the provincial level, all species red-listed under the Red List of South African plants (<http://redlist.sanbi.org/>) as well as species listed under the Northern Cape Conservation Act (2009) are protected and require provincial permits. The Northern Cape Conservation Act (2009) lists a variety of species as protected but also several whole families and genera as protected.

Protected fauna species red-listed under the Red List of South African plants (<http://redlist.sanbi.org/>) as well as species listed under the Northern Cape Conservation Act (2009) are protected and require provincial permits. The North Cape Conservation Act lists a variety of species as protected but also several whole families and genera as protected.

## 3. IDENTIFICATION OF LISTED SPECIES

At the national level, protected trees are listed by DAFF under the National List of Protected Trees, which is updated on a regular basis. Any clearing of nationally protected trees requires a permit from DAFF. Of particular concern at the Hyperion site is the presence of large numbers of *Vachellia erioloba* and *V.haematoxylon*. These species are however unsuitable for search and rescue and all affected trees would need to be destroyed. At the provincial level, all species red-listed under the Red List of South African plants (<http://redlist.sanbi.org/>) as well as species listed under the Northern Cape Nature Conservation Act (No. 9 of 2009) are protected and require provincial permits.

## 4. MITIGATION & AVOIDANCE OPTIONS



The primary mitigation and avoidance measure that must be implemented at the pre-construction phase is the Pre-construction Walk-Through of the development footprint. This defines which and how many individuals of listed and protected species are found within the development footprint. This information is required for the DEFF and NC Nature Conservation permits which must be obtained before construction can commence.

Where listed species fall within the development footprint and avoidance is not possible, then it may be possible to translocate the affected individuals outside of the development footprint. However, not all species are suitable for translocation as only certain types of plants are able to survive the disturbance. Suitable candidates for translocation include most geophytes and succulents. Although there are exceptions, the majority of woody species do not survive translocation well and it is generally not recommended to try and attempt to translocate such species. Recommendations in this regard would be made following the walk-through of the facility footprint before construction, where all listed and protected species within the development footprint will be identified and located.

## **5. RESCUE AND PROTECTION PLAN**

### **5.1. Pre-construction**

- » Identification of all listed species which may occur within the site, based on the SANBI POSA database as well as the specialist studies for the site and any other relevant literature.
- » Before construction commences at the site, the following actions should be taken:
  - A walk-through of the final development footprint by a suitably qualified botanist/ecologist to locate and identify all listed and protected species which fall within the development footprint. This should happen during the flowering season at the site which, depending on rainfall, is likely to be during spring to early summer (August-October).
  - A walk-through report following the walk-through which identifies areas where minor deviations to roads and other infrastructure can be made to avoid sensitive areas and important populations of listed species must be compiled. The report should also contain a full list of localities where listed species occur within the development footprint and the number of affected individuals in each instance, so that this information can be used to comply with the permit conditions required by the relevant legislation. Those species suitable for search as rescue should be identified in the walk-through report.
  - A permit to clear the site and relocate species of concern is required Northern Cape DAEARD&LR before construction commences.
  - A tree clearing permit is also required from DEFF to clear protected trees from the site.
  - Once the permits have been issued, there should be a search and rescue operation of all listed species that cannot be avoided, which have been identified in the walk-through report as being suitable for search and rescue within the development footprint. Affected individuals should be translocated to a similar habitat outside of the development footprint and marked for monitoring purposes.

### **5.2. Construction**

- » Vegetation clearing should take place in a phased manner, so that large cleared areas are not left standing with no activity for long periods of time and pose a wind and water erosion risk. This will require

coordination between the contractor and EO, to ensure that the EO is able to monitor activities appropriately.

- » All cleared material should be handled according to the Revegetation and Rehabilitation Plan and used to encourage the recovery of disturbed areas.
- » EO to monitor vegetation clearing at the site. Any deviations from the plans that may be required should first be checked for listed species by the EO and any listed species present which are able to survive translocation should be translocated to a safe site.
- » All areas to be cleared should be demarcated with construction tape, survey markers or similar. All construction vehicles should work only within the designated area.
- » Plants suitable for translocation or for use in rehabilitation of already cleared areas should be identified and relocated before general clearing takes place.
- » Any listed species observed within the development footprint that were missed during the pre-construction plant sweeps should be translocated to a safe site before clearing commences.
- » Many listed species are also sought after for traditional medicine or by collectors and so the EO and ECO should ensure that all staff attend environmental induction training in which the legal and conservation aspects of harvesting plants from the wild are discussed.
- » The EO should monitor construction activities in sensitive habitats such as in dune areas carefully to ensure that impacts to these areas are minimised.

### **5.3. Operation**

- » Access to the site should be strictly controlled and all personnel entering or leaving the site should be required to sign in and out with the security officers.
- » The collecting of plants or their parts should be strictly forbidden and signs stating so should be placed at the entrance gates to the site.

## **6. MONITORING & REPORTING REQUIREMENTS**

The following reporting and monitoring requirements are recommended as part of the plant rescue and protection plan:

- » Pre-construction walk-through report detailing the location and distribution of all listed and protected species must be compiled. This should include a walk-through of all infrastructure including all new access roads, cables, buildings and substations. The report should include recommendations of route adjustments where necessary, as well as provide a full account of how many individuals of each listed species will be impacted by the development. Details of plants suitable for search and rescue must also be included.
- » Permit applications to NC DAEARD&LR and DEFF. This requires the walk-through report as well as the identification and quantification of all listed and protected species within the development footprint. The permit is required before any search and rescue or vegetation clearance can take place. Where large numbers of listed species are affected, a site inspection and additional requirements may be imposed by NC DAEARD&LR and DEFF as part of the permit conditions. All documentation associated with this process needs to be retained and the final clearing permit should be kept at the site.
- » Active daily monitoring of clearing during construction by the EO must be undertaken to ensure that listed species and sensitive habitats are avoided. All incidents should be recorded along with the remedial measures implemented.

- » Post construction monitoring of plants translocated during search and rescue to evaluate the success of the intervention. Monitoring for a year post-transplant should be sufficient to gauge success.

## Appendix (E) - Reveg & Rehab Plan

## REVEGETATION AND REHABILITATION PLAN

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### 1. PURPOSE

The purpose of the Rehabilitation Plan is to ensure that areas cleared or impacted during construction activities within the site for the thermal plant and upgraded access road, and that are not required for operation are rehabilitated to their original state before the operation phase commences, and that the risk of erosion from these areas is reduced. The purpose of the Rehabilitation Plan for the site can be summarised as follows:

- » Achieve long-term stabilisation of all disturbed areas.
- » Re-vegetate all disturbed areas with suitable local plant species.
- » Minimise visual impact of disturbed areas.
- » Ensure that disturbed areas are rehabilitated to a condition similar to that found prior to disturbance.

This Rehabilitation Plan should be read in conjunction with other site-specific plans, including the Erosion Management Plan, Soil Management Plan, Alien Invasive Management Plan and Plant Rescue and Protection Plan. Prior to the commencement of construction, a detailed Rehabilitation Plan and Method Statement for the site should be compiled with the aid of a suitably qualified, professionally registered specialist (with a botanical or equivalent qualification).

### 2. RELEVANT ASPECTS OF THE SITE

The project site is restricted to the Kathu Bushveld vegetation type. This vegetation unit extends from around Kathu and Dibeng in the south through Hotazel and to the Botswana border between Van Zylsrus and McCarthysrus. The vegetation within the project site comprises of bushveld with a well-developed tree layer and a variable-density grass layer. Three broad vegetation communities were identified, the area west of the Vlermuisleegte River, the river itself and the area east of the Vlermuisleegte River. The area west of the river is largely dominated by *Tarchonanthus camphoratus* and *Vachellia haematoxylon* with a few areas where *V. erioloba* and/or *Acacia mellifera* become dominant. In the area east of the river, the vegetation is generally more open and largely dominated by *V. erioloba* with some localised areas dominated by *Acacia mellifera* or *Terminalia sericea*.

Three NFA protected species occur at the site and includes:

- » *Boscia albitrunca* (not observed within the development footprint),
- » *V. erioloba*; and
- » *V. haematoxylon*.

The project site has a relatively high abundance of *V. erioloba* and *V. haematoxylon* and the loss of relatively high numbers of individuals of these species cannot be avoided.

### 3. REHABILITATION METHODS AND PRACTISES

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

- » Clearing of invaded areas should be conducted as per the Alien Management Plan, included in the EMPr.
- » No harvesting of vegetation may be undertaken outside the area to be disturbed by construction activities.
- » Indigenous plant material must be kept separate from alien material.
- » Indigenous seeds may be harvested for purposes of revegetation in areas that are free of alien invasive vegetation, either at the site prior to clearance or from suitable neighbouring sites.
- » Topsoil should be reserved wherever possible on site, to be utilised during rehabilitation.
- » Sods used for revegetation should be obtained directly from the site, but not from the sensitive areas. Sods should contain at least a 50 mm topsoil layer and be minimally disturbed, in particular to existing root systems. Sods must ideally be obtained from areas as close as possible to the region that is to be rehabilitated.
- » Water used for the irrigation of re-vegetated areas should be free of chlorine and other pollutants that might have a detrimental effect on the plants.
- » All seeded, planted or sodded grass areas and all shrubs or trees planted are to be irrigated at regular intervals.
- » On steep slopes and areas where seed and organic matter retention is low, it is recommended that soil savers are used to stabilise the soil surface. Soil savers are man-made materials, usually constructed of organic material such as hemp or jute and are usually applied in areas where traditional rehabilitation techniques are not likely to succeed.
- » In areas where soil saver is used, it should be pegged down to ensure that it captures soil and organic matter flowing over the surface.
- » The final rehabilitated area should resemble the current composition and structure of the soil as far as practicably possible.
- » Progressive rehabilitation is an important element of the rehabilitation strategy and should be implemented where feasible.
- » No construction equipment, vehicles or unauthorised personnel should be allowed onto areas that have been rehabilitated.
- » Where rehabilitation sites are located within actively grazed areas, they should be fenced off, this must be undertaken in consultation with the landowner.
- » Any runnels, erosion channels or wash-aways developing after revegetation should be backfilled and consolidated and the areas restored to a proper stable condition.
- » Re-vegetated areas should be monitored frequently and prepared and revegetation from scratch should inadequate signs of surface coverage or grown be evident after two growth seasons. Adequate recovery must be assessed by a qualified botanist or rehabilitation specialist.
- » The stockpiled vegetation from the clearing operations should be reduced to mulch where possible, and retained along with topsoil to encourage seedbank regrowth and soil fertility.
- » Mulches must be collected in such a manner as to restrict the loss of seed.
- » Mulch must be stored for as short a period as possible.
- » Mulch is to be harvested from areas that are to be denuded of vegetation during construction activities, provided that they are free of seed-bearing alien invasive plants.
- » Where herbicides are used to clear vegetation, species-specific chemicals should be applied to individual plants only. General spraying should be strictly prohibited, and only the correct herbicide type should be applied.
- » Once rehabilitated, areas should be protected to prevent trampling and erosion.
- » Fencing should be removed once a sound vegetative cover has been achieved.



#### **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 Developer 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:

- » Associated nature and stability of surface soils.
- » Re-emergence of alien and invasive plant species. If noted, remedial action must be taken immediately, as per the alien management plan and mitigation measures contained within the EMPr.

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

- » Rehabilitation areas should be monitored every 4 months for the first 12 months following construction, or as per the recommendations of specialist.
- » 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 timeframe between construction activities and rehabilitation should be minimised. Phased construction and progressive rehabilitation, where practically possible, are therefore important elements of the erosion control and rehabilitation strategy.
- » Any areas showing erosion, should be adaptively managed with particular erosion control measures, depending on the situation.

If the current state of the environment prior to construction (which will be disturbed during the construction phase) is not achieved post impact, within the specified rehabilitation period, maintenance of these areas must continue until an acceptable state is achieved (excluding alien plant species or weeds). Additional rehabilitation methods may be necessary to achieve the current state before construction commenced.

Monitoring of the rehabilitation success, as well as follow-up adaptive management, combined with the clearing of emerging alien plant species should all continue for as long as is considered necessary, depending on regrowth rates.

## Appendix (F) - Erosion MP

## PRINCIPLES FOR EROSION MANAGEMENT

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### 1. PURPOSE

Exposed and unprotected soils are the main cause of erosion in most situations. Therefore, this Erosion Management Plan, the Storm water 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.

This 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 landscape within the project site can be described as flat to very slightly undulating with a well-developed tree layer and a variable-density grass layer. The main landscape feature within the project site is the Vlermuisleegte (non-perennial river) which traverses the centre of the project site and is situated below the level of the surrounding plains. These plains are covered in red sand and grass with some larger *Acacia erioloba* species. The project site is characterised by topographical variations mostly due to depression features (pan wetlands) and the Vlermuisleegte River.

During construction, there will be a lot of disturbed and loose soil at the site which will render the area vulnerable to erosion. The veld is in good condition and there are no signs of overgrazing, land degradation or erosion.

During the operation phase the impacts related to loss of land use and land capability will remain the same. Areas under permanent buildings, substations, transformers and other covered surfaces are no longer susceptible to erosion, but hard surfaces will increase run-off during rain storms onto bare soil surfaces.

### 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.
- » Soil 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 with energy dissipation features present to slow and disperse the water into the receiving area.
- » Roads used for project-related activities 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.
- » Runoff may have to be specifically channeled or storm water adequately controlled to prevent localised rill and gully erosion.
- » 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 must 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. No driving off of hardened roads should occur at any time, and particularly immediately following large rainfall events.
- » 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 (on-going) 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 storm water control measures (post construction).
- » All temporary and permanent water management structures or stabilisation methods must be indicated within the Storm water Management Plan.
- » An on-site 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 should 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 Management 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 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). During the construction phase, the contractor must prepare an Erosion 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 this plan are met before, during and after construction. The designated responsible person on site, must be indicated in the Method Statement and shall ensure that relevant erosion control measures are in place throughout the construction phase.

An operation phase Erosion 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.



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## Appendix (G) - Stormwater MP

## **STORMWATER MANAGEMENT PLAN**

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### **1. PURPOSE**

By taking greater cognisance of natural hydrological patterns and processes it is possible to develop storm water management systems in a manner that reduces these potentially negative impacts and mimic nature. The main risks associated with inappropriate storm water management are increased erosion risk and risks associated with flooding. Therefore, this Storm water Management Plan and the Erosion Management Plan are closely linked to one another and should be managed together.

This Storm water Management Plan addresses the management of storm water 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.

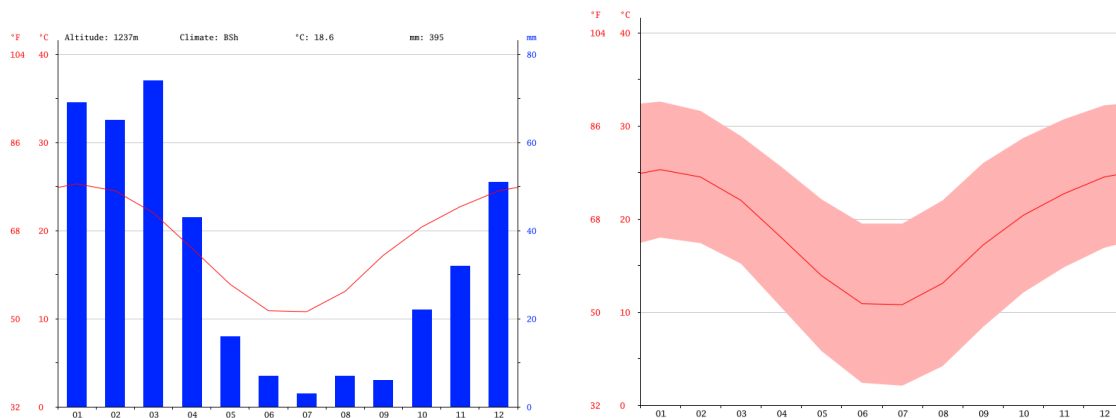
This Storm water Management Plan must be updated and refined once the construction/ civil engineering plans have been finalised following detailed design.

### **2. RELEVANT ASPECTS OF THE SITE**

The project site is situated within the Lower Vaal Water Management Area (WMA) 10, Quaternary Catchment D41K (Molopo Catchment) and the Southern Kalahari Ecoregion. The project site is furthermore located in an area defined as an upstream management catchment (FEPACODE 4). Upstream management catchments are required to prevent the downstream degradation of FEPAs and Fish Support Areas (FSAs). The episodic Vlermuisleegte River bisects the centre of the project site. This river drains in a south-eastern to north-western direction and is considered to be largely natural according to the Present Ecological State (PES) 1999. In contrary, the river is classified as moderately modified (Class C) according to the National Freshwater Ecosystem Priority Area (NFEPA) database.

A perched depression wetland has been identified within the northern portion of the project site, situated within the Vlermuisleegte River. This depression is considered to be in a natural or good ecological condition (Class B).

The Kathu area is typically characterised as having a local steppe climate (BSh) with little rainfall. The area receives a mean annual average rainfall of approximately 395mm. Precipitation is highest in March with an average of 74mm; and lowest in July with an average of 3mm. Minimal rain occurs between May to September. The average annual temperature in Kathu is 18.9°C. January is the hottest month of the year with an average temperature of 25.3°C, while July is the coldest month of the year with an average temperature of 10.8°C (refer to **Figure 1**). Frost is frequent to very frequent during winter, with up to 37 mean frost days per year. Droughts and floods are a regular occurrence at both provincial and local scales, and play a significant role in almost every aspect of the social, economic, and ecological environment within the Province.



**Figure 1: Climate and Temperature graphs for Kathu, Northern Cape Province (Source: en.climate-data.org).**

### 3. STORMWATER MANAGEMENT PRINCIPLES

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

- » Prevent concentration of storm water flow at any point where the ground is susceptible to erosion.
- » Reduce storm water flows as far as possible by the effective use of attenuating devices (such as swales, berms, silt fences). As construction progresses, the storm water control measures are to be monitored and adjusted to ensure complete erosion and pollution control at all times.
- » Silt traps must be used where there is a danger of topsoil or material stockpiles eroding and entering streams and other sensitive areas.
- » Construction of gabions and other stabilisation features on steep slopes may be undertaken to prevent erosion, if deemed necessary.
- » 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 storm water flow above that which the natural ground can safely accommodate at any point in the sub-catchments.
- » Ensure that all storm water control works are constructed in a safe and aesthetic manner in keeping with the overall development.
- » Plan and construct storm water 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 storm water flow should not exceed the capacity of the culvert. To assist with the storm water run-off, gravel roads should typically be graded and shaped with a 2-3% crossfall back into the slope, allowing storm water to be channelled in a controlled manner 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 storm water flow at that point. Provide detention storage on the road and/or upstream of the storm water 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 storm water 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 storm water 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**

Detailed engineering specifications for a Storm water Management Plan describing and illustrating the proposed storm water 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 storm water control measures (post construction) must be indicated within the Final/Updated Storm water Management Plan.
- » All temporary and permanent water management structures or stabilisation methods must be indicated within the Final/Updated Storm water 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 water 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 on-site Engineer or Environmental Officer is 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 storm water plan is not correctly or appropriately implemented and damage to the environment is caused.

During the construction phase, the contractor must prepare a Storm water 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 Storm water Management Plan are met before, during and after construction. The designated responsible person on site, must be indicated in the Storm water Control Method Statement and shall ensure that no construction work takes place before the relevant storm water control measures are in place.

An operation phase Storm water 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 (H) - Waste MP

# WASTE MANAGEMENT PLAN

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## 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 various 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 generated from the project activities on site.

This WMP has been compiled as part of the project EMPr and is based on waste stream information available at the time of compilation. Construction and operation activities must be assessed 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 updated once further detail regarding waste quantities and categorisation become available, during the construction and/or operation stages. This plan should be updated throughout the life-cycle of the thermal plant, as required in order to ensure that appropriate measures are in place to manage and control waste and to ensure compliance with relevant legislation.

Prior to the commencement of construction, a detailed Waste Management Method Statement for the site should be compiled by the Contractor.

## 2. RELEVANT ASPECTS OF THE SITE

It is expected that the development of the thermal plant and upgraded access road will generate construction solid waste, as well as general waste and hazardous waste during the lifetime of the solar energy facility.

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

- » Concrete waste generated from spoil and excess concrete.
- » Contaminated water, soil, rocks and vegetation due to hydrocarbon spills.
- » Hazardous waste from vehicle, equipment and machinery parts and servicing, fluorescent tubes, used hydrocarbon containers, and waste ink cartridges.
- » Recyclable waste in the form of paper, glass, steel, aluminium, wood/ wood pallets, plastic (PET bottles, PVC, LDPE) and cardboard.
- » Organic waste from food waste as well as alien and endemic vegetation removal.
- » Sewage from portable toilets and septic tanks.
- » Inert waste from spoil material from site clearance and trenching works.

## 3. LEGISLATIVE REQUIREMENTS

Waste in South Africa is currently governed by several regulations, 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); and
- » Air Quality Act (Act 39 of 2004).

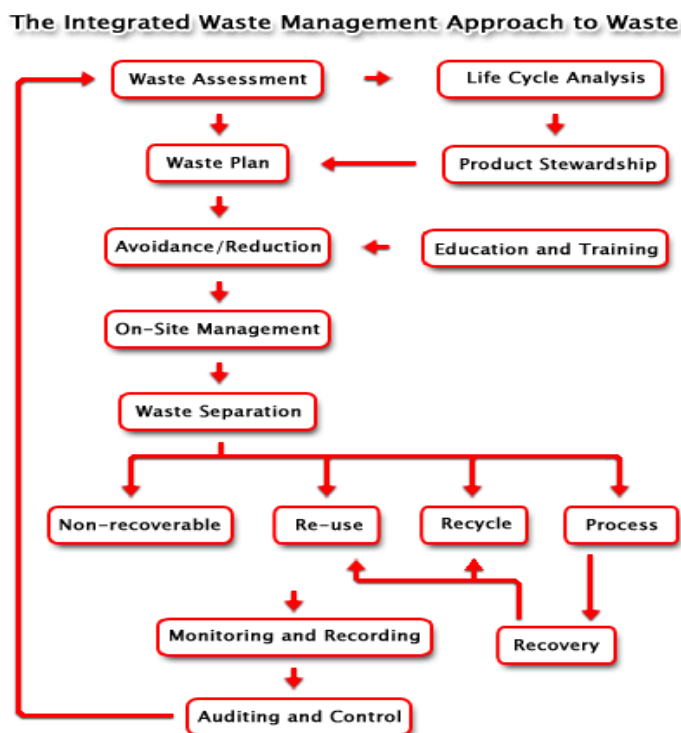
Storage of waste must be conducted in accordance with the National Norms and Standards for the Storage of Waste, published in GNR 926.

#### 4. WASTE MANAGEMENT PRINCIPLES

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

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 the greatest 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.



**Figure 1: Integrated Waste Management Flow Diagram**

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

#### **4.1. Construction phase**

A plan for the management of waste during the construction phase is detailed below. A Method Statement detailing specific waste management practices during construction should be prepared by the Contractor prior to the commencement of construction, for approval by the Resident Engineer.

##### **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 methods and materials should be carefully considered in view of waste reduction, re-use, and recycling opportunities, to be pro-actively implemented.
- » Once a waste inventory has been established, targets for the 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. Such practises must be made contractually binding upon appointment of the subcontractors.
- » Waste manifests and waste acceptance approvals (i.e. receipts) from designated waste facilities must be kept on file at the site office, in order to record and prove continual compliance for future auditing.
- » Septic tanks and portable toilets must be monitored by the EO or responsible subcontractor and maintained regularly. 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 moving around in the surrounding area.
- » Waste collection bins and hazardous waste containers must be provided by the principal contractor and subcontractors and placed at strategic locations around the 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, and must ensure complete containment of the spilled material in the event of a breach. As such, appropriate bunding material, design, capacity and type must be utilised to ensure that no contamination of the surrounding environment will occur despite a containment breach. The net capacity of a bunded compound in a storage facility should be at least 120% of the net capacity of the largest tank.
- » Take into consideration the capacity displaced by other tanks within the same bunded area and any foundations.

- » Treat interconnected tanks as a single tank of equivalent total volume for the purposes of the bund design criteria.
- » 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, while being reasonably placed in terms of centrality and accessibility on site. Where required, an additional temporary waste storage area may be designated, provided identical controls are exercised for these locations.
- » Waste storage shall be in accordance with all Regulations and best-practice guidelines and under no circumstances may waste be burnt on site.
- » A dedicated waste management team must be appointed by the principal contractors' SHE Officer, who 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 SHE Officer.
- » All waste removed from site must be done by a registered/ licensed subcontractor, who 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, records of which must be kept on file at the site camp for the duration of the construction period.

#### **4.1.3. Management of waste storage areas**

- » Waste storage must be undertaken in accordance with the relevant Norms and Standards.
- » The position of all waste storage areas must be located so as to ensure minimal degradation to the environment. The main waste storage area must have a suitable storm water system separating clean and contaminated storm water.
- » Collection bins placed around the 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 to avoid overflowing receptacles.
- » 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. Monitor for rodents and take corrective action if they become a problem.
- » Waste must be stored in designated containers and not on the ground.
- » Inspections and maintenance of bunds must be undertaken regularly. 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 treated by oil/water separation (or similar method) prior to dewatering, or removed and stored as hazardous waste, and not released into the environment.
- » If any leaks occur in the bund, these must be amended immediately.
- » Bund systems must be designed to avoid dewatering of contaminated water, but to rather separate oil and hydrocarbons from water prior to dewatering.
- » Following rainfall event bunds must always be dewatered in order to maintain a sufficient storage capacity in the event of a breach.
- » No mixing of hazardous and general waste is allowed.

#### **4.1.4. Disposal**

- » Waste generated on site must be removed on a regular basis. This frequency may change during construction depending on waste volumes generated at different stages of the construction process,

however removal must occur prior to the storage capacity being reached to avoid overflow of containers and poor waste storage.

- » Waste must be removed by a suitably qualified contractor and disposed of 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 WMP is determined by measuring criteria such as waste volumes, cost recovery from recycling and 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.

### **4.2. Operation phase**

It is expected that the operation 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. Hazardous wastes (including grease, oils) will 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 or other facilities.

The following waste management principles apply during the operation 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 operation 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 operation phase.
- » Waste must be removed by a suitably qualified contractor and disposed of at an appropriately licensed landfill site. Proof of appropriate disposal must be provided by the contractor and kept on site.



## **5. 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 (J) - Emergency Preparedness & Fire MP

# EMERGENCY PREPAREDNESS, RESPONSE AND FIRE MANAGEMENT PLAN

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## 1. PURPOSE

The purpose of the Emergency Preparedness and Response Plan is:

- » To assist contractor personnel to prepare for and respond quickly and safely to emergency incidents, and to establish a state of readiness which will enable prompt and effective responses to possible events.
- » To control or limit any effect that an emergency or potential emergency may have on site or on neighbouring areas.
- » To facilitate emergency responses and to provide such assistance on the site as is appropriate to the occasion.
- » To ensure communication of all vital information as soon as possible.
- » To facilitate the reorganisation and reconstruction activities so that normal operations can be resumed.
- » To provide for training so that a high level of preparedness can be continually maintained.

This plan outlines response actions for potential incidents of any size. It details response procedures that will minimise potential health and safety hazards, environmental damage, and clean-up efforts. The plan has been prepared to ensure quick access to all the information required in responding to an emergency event. The plan will enable an effective, comprehensive response to prevent injury or damage to the construction personnel, public, and environment during the project. Contractors are expected to comply with all procedures described in this document. A Method Statement should be prepared at the commencement of the construction phase detailing how this plan is to be implemented as well as details of relevant responsible parties for the implementation. The method statement must also reflect conditions of the IFC Performance Standard 1 and include the following:

- » Identification of areas where accidents and emergency situations may occur;
- » Communities and individuals that may be impacted;
- » Response procedure;
- » Provisions of equipment and resources;
- » Designation of responsibilities;
- » Communication; and
- » Periodic training to ensure effective response to potentially affected communities.

## 2. PROJECT-SPECIFIC DETAILS

Hyperion Solar Development (Pty) Ltd is proposing the development of a 75MW Thermal Dual Fuel facility that will be operated in combination with the authorised Hyperion 1 and 2 Solar PV facilities as a hybrid facility, consisting of thermal generation technology and photovoltaic technology. The hybrid facility will aim to meet the Emergency Power Procurement bid requirements of being 100% dispatchable between the hours of 05h00 and 21h30. Where possible and where available, solar power will be utilised to meet the demand. Where solar power is not available (typically between the hours of 5h00 and 07h00 and again between 18h00 and 21h30) or energy from the Battery Energy Storage System (BESS) for the PV facility, thermal generation will be utilised. It is currently estimated that between 50 – 65% of the demand will be met utilising solar power with the remaining 35 – 50 % being met with thermal generation. The facility will be

controlled by a joint controller that will have the capability of assessing the demand and regulating the power supply from the solar and thermal facilities accordingly.

The thermal facility is proposed to be located within the footprint of the authorised Hyperion 1 & 2 Solar PV facility on Remainder of the Farm Lyndoch 432, an area of 340 ha, and is anticipated to be approximately 5ha in extent. A new access road to the thermal facility is proposed to be established from the gravel main road to the south of the site and traverse Remainder of the Farm 457, Portion 1 of the Farm 457, and Portion 2 of the Farm 457. All the affected properties of the proposed thermal facility and access road are privately owned. The thermal generation facility will initially make use of either LPG which can be readily trucked to the site. The overarching objective for the hybrid facility is to introduce a technology solution that is 100% dispatchable at short notice able to provide electricity supply into the grid as and when is required to avert electricity disruptions and is flexible and that can operate across a wide variety of dispatch profiles, from base load to peaking and providing ancillary services to aid grid stability.

The main infrastructure associated with the facility includes the following:

- » Reciprocating Engines, utilising Liquefied Petroleum Gas (LPG) as a fuel source
- » Access road
- » Truck entrance and parking facility
- » Regasification plant and fuel preparation plant
- » Dry cooling system for operating oils/chemicals
- » Fuel off-loading facility
- » Fuel storage facility
- » Water demineralisation
- » Raw water and treated water storage tank
- » Oily water separator and storm water drainage system
- » Substation, cabling, O&M building, fencing, warehouses and workshops

The power generated by the Hyperion hybrid generation facility will feed into the national electricity grid via an overhead 132kV power line. This power line is the subject of a separate Application for Authorisation.

Due to the scale and nature of this development, it is anticipated that the following risks could potentially arise during the construction and operation phases:

- » Fires;
- » Leakage of hazardous substances;
- » Storage of flammable materials and substances;
- » Flood events;
- » Accidents; and
- » Natural disasters.

### **3. EMERGENCY RESPONSE PLAN**

There are three levels of emergency as follows:

- » Local Emergency: An alert confined to a specific locality.
- » Site Emergency: An alert that cannot be localised and which presents danger to other areas within the site boundary or outside the site boundary.

- » Evacuation: An alert when all personnel are required to leave the affected area and assemble in a safe location.

If there is any doubt as to whether any hazardous situation constitutes an emergency, then it must be treated as an Evacuation.

Every effort must be made to control, reduce or stop the cause of any emergency provided it is safe to do so. For example, in the event of a fire, isolate the fuel supply and limit the propagation of the fire by cooling the adjacent areas. Then confine and extinguish the fire (where appropriate) making sure that re-ignition cannot occur.

### **3.1. Emergency Scenario Contingency Planning**

#### **3.1.1. Scenario: Spill which would result in the contamination of land, surface or groundwater**

##### **i. Spill Prevention Measures**

Preventing spills must be the top priority at all operations which have the potential of endangering the environment. The responsibility to effectively prevent and mitigate any scenario lies with the Contractor and the ECO. In order to reduce the risk of spills and associated contamination, the following principles should be considered during construction and operation activities:

- » All equipment refuelling, servicing and maintenance activities should only be undertaken within appropriately sealed/contained or bunded designated areas.
- » All maintenance materials, oils, grease, lubricants, etc. should be stored in a designated area in an appropriate storage container.
- » No refuelling, storage, servicing, or maintenance of equipment should take place within sensitive environmental resources in order to reduce the risk of contamination by spills.
- » No refuelling or servicing should be undertaken without absorbent material or drip pans properly placed to contain spilled fuel.
- » Any fluids drained from the machinery during servicing should be collected in leak-proof containers and taken to an appropriate disposal or recycling facility.
- » If these activities result in damage or accumulation of product on the soil, the contaminated soil must be disposed of as hazardous waste. Under no circumstances shall contaminated soil be added to a spoils pile and transported to a regular disposal site.
- » Chemical toilets used during construction must be regularly cleaned. Chemicals used in toilets are also hazardous to the environment and must be controlled. Portable chemical toilets could overflow if not pumped regularly or they could spill if dropped or overturned during moving. Care and due diligence should be taken at all times.
- » Contact details of emergency services and HazMat Response Contractors are to be clearly displayed on the site. All staff are to be made aware of these details and must be familiar with the procedures for notification in the event of an emergency.

##### **ii. Procedures**

The following action plan is proposed in the event of a spill:

1. Spill or release identified.
2. Assess person safety, safety of others and environment.
3. Stop the spill if safely possible.
4. Contain the spill to limit entering surrounding areas.
5. Identify the substance spilled.
6. Quantify the spill (under or over guideline/threshold levels).
7. Notify the Site Manager and emergency response crew and authorities (in the event of major spill).
8. Inform users (and downstream users) of the potential risk.
9. Clean up of the spill using spill kit or by HazMat team.
10. Record of the spill incident on company database.

#### **a) Procedures for containing and controlling the spill (i.e. on land or in water)**

Measures can be taken to prepare for quick and effective containment of any potential spills. Each contractor must keep sufficient supplies of spill containment equipment at the construction sites, at all times during and after the construction phase. These should include specialised spill kits or spill containment equipment. Other spill containment measures include using drip pans underneath vehicles and equipment every time refuelling, servicing, or maintenance activities are undertaken.

Specific spill containment methods for land and water contamination are outlined below.

#### **Containment of Spills on Land**

Spills on land include spills on rock, gravel, soil and/or vegetation. It is important to note that soil is a natural sorbent, and therefore spills on soil are generally less serious than spills on water as contaminated soil can be more easily recovered. It is important that all measures be undertaken to avoid spills reaching open water bodies located outside of the project site. The following methods could be used:

- » *Dykes* - Dykes can be created using soil surrounding a spill on land. These dykes are constructed around the perimeter or down slope of the spilled substance. A dyke needs to be built up to a size that will ensure containment of the maximum quantity of contaminant that may reach it. A plastic tarp can be placed on and at the base of the dyke such that the contaminant can pool up and subsequently be removed with sorbent materials or by pump into barrels or bags. If the spill is migrating very slowly, a dyke may not be necessary and sorbents can be used to soak up contaminants before they migrate away from the source of the spill.
- » *Trenches* - Trenches can be dug out to contain spills. Spades, pick axes or a front-end loader can be used depending on the size of the trench required. Spilled substances can then be recovered using a pump or sorbent materials.

#### **b) Procedures for transferring, storing, and managing spill related wastes**

Used sorbent materials are to be placed in plastic bags for future disposal. All materials mentioned in this section are to be available in the spill kits. Following clean up, any tools or equipment used must be properly washed and decontaminated, or replaced if this is not possible.



Spilled substances and materials used for containment must be placed into empty waste oil containers and sealed for proper disposal at an approved disposal facility.

### **c) Procedures for restoring affected areas**

Criteria that may be considered include natural biodegradation of oil, replacement of soil and revegetation. Once a spill of reportable size has been contained, the ECO and the relevant Authority must be consulted to confirm that the appropriate clean up levels are met.

#### **3.1.2. Scenario: Fire (and fire water handling)**

##### **i. Action Plan**

The following action plan is proposed in the event of a fire:

1. Quantify risk.
2. Assess person safety, safety of others and environment.
3. If safe – attempt to extinguish the fire using appropriate equipment.
4. If not safe to extinguish, contain fire.
5. Notify the Site Manager and emergency response crew and authorities.
6. Inform users of the potential risk of fire.
7. Record the incident on the company database or filing register.

##### **ii. Procedures**

Because large scale fires may spread very fast it is most advisable that the employee/contractor not put his/her life in danger in the case of an uncontrolled fire.

Portable firefighting equipment must be provided at strategic locations throughout the site, in line with the Building Code of South Africa and the relevant provincial building code. All emergency equipment including portable fire extinguishers, hose reels and hydrants must be maintained and inspected by a qualified contractor in accordance with the relevant legislation and national standards.

Current evacuation signs and diagrams for the building or site that are compliant to relevant state legislation must be provided in a conspicuous position, on each evacuation route. Contact details for the relevant emergency services should be clearly displayed on site and all employees should be aware of procedures to follow in the case of an emergency.

### **a) Procedures for initial actions**

Persons should not fight the fire if any of the following conditions exist:

- » They have not been trained or instructed in the use of a fire extinguisher.
- » They do not know what is burning.
- » The fire is spreading rapidly.
- » They do not have the proper equipment.
- » They cannot do so without a means of escape.

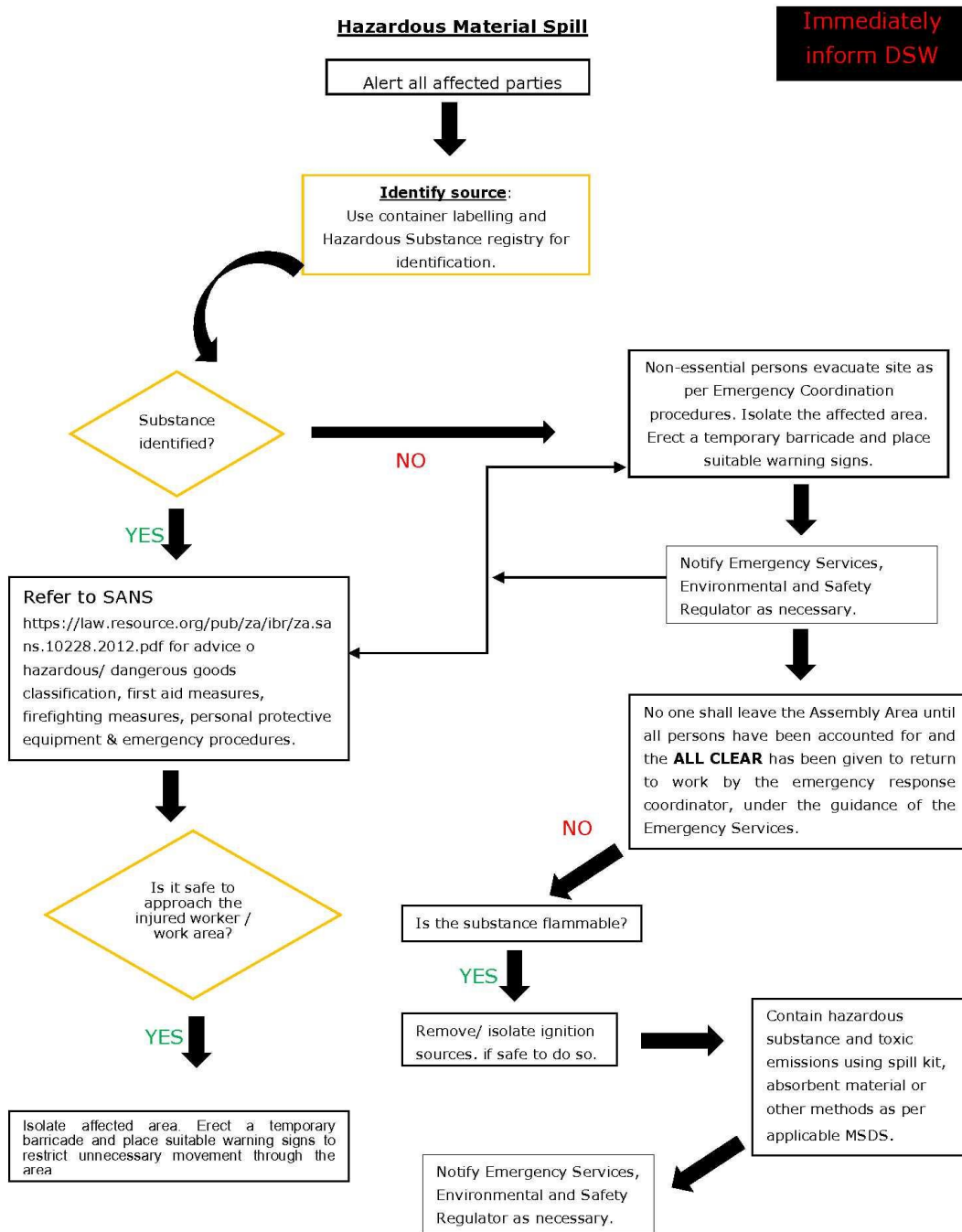
- » They may inhale toxic smoke.

**b) Reporting procedures**

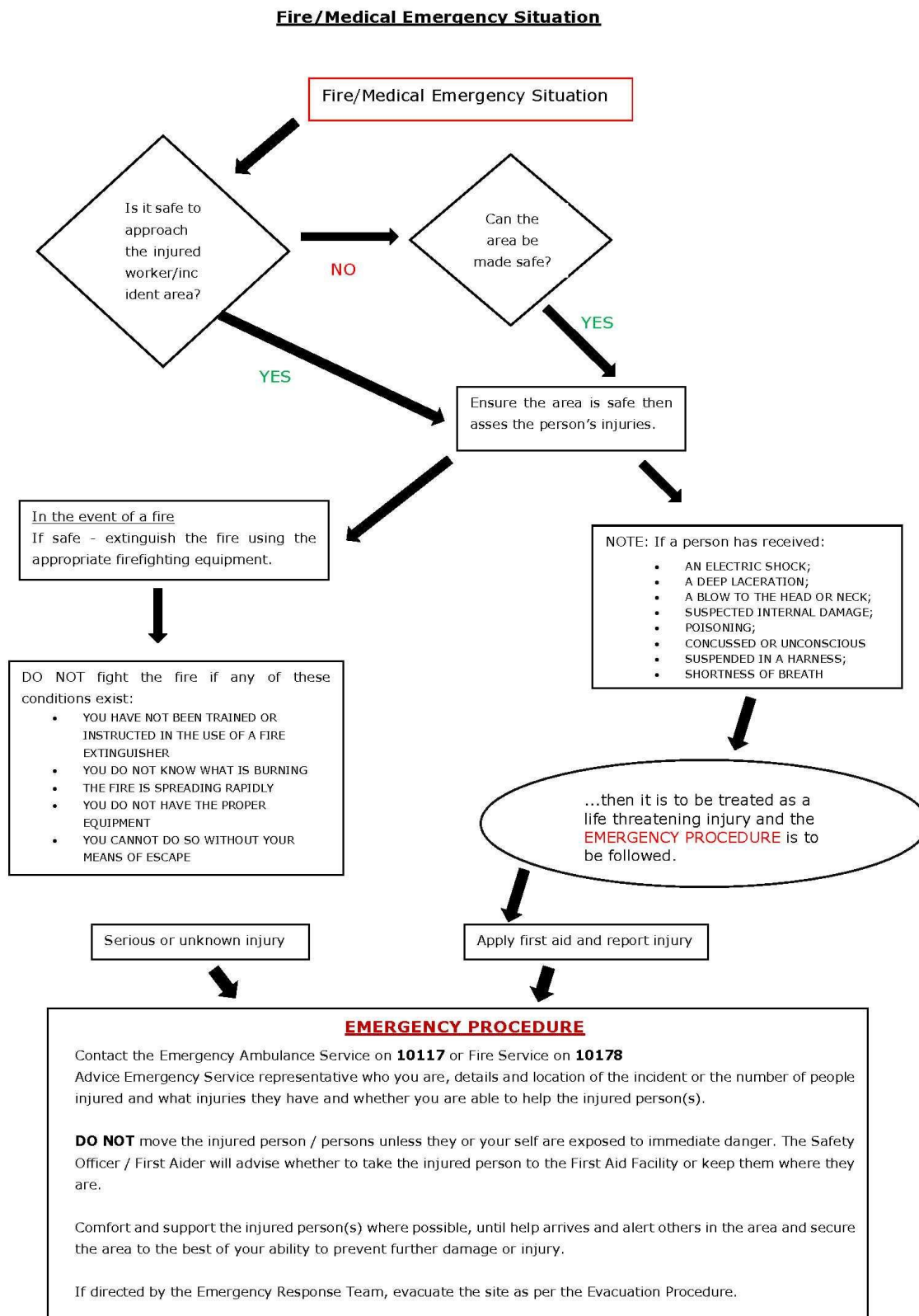
In terms of the requirements of NEMA, the responsible person must, within 14 days of the incident, report to the Director General, provincial head of department and municipality.

- » Report fire immediately to the site manager, who will determine if it is to be reported to the relevant emergency services and authorities.
- » The site manager must have copies of the Report form to be completed.

**SUMMARY: RESPONSE PROCEDURE**



**Figure 1:** Hazardous Material Spill



**Figure 2:** Emergency Fire/Medical

#### **4. PROCEDURE RESPONSIBILITY**

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 Plan, 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.

The local authorities will provide their assistance when deemed necessary, or when it has been requested and/or indicated in Section 30 (8) of NEMA. The provincial authority will provide assistance and guidance where required and conduct awareness programmes.

## Appendix (L) - Key Legislation

## APPLICABLE LEGISLATION

**Table 1:** Applicable Legislation, Policies and/or Guidelines associated with the development of the Thermal plant

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
<b>National Legislation</b>			
Constitution of the Republic of South Africa (No. 108 of 1996)	<p>In terms of Section 24, the State has an obligation to give effect to the environmental right. The environmental right states that:</p> <p><i>"Everyone has the right –</i></p> <ul style="list-style-type: none"> <li>» <i>To an environment that is not harmful to their health or well-being, and</i></li> <li>» <i>To have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures that:</i> <ul style="list-style-type: none"> <li>* <i>Prevent pollution and ecological degradation,</i></li> <li>* <i>Promote conservation, and</i></li> <li>* <i>Secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development."</i></li> </ul> </li> </ul>	Applicable to all authorities	There are no permitting requirements associated with this Act. The application of the Environmental Right implies a long term responsibility to ensure sustainable development and environmental protection for future generations. The Environmental right clause provides that justifiable economic and social development should be promoted, through the use of natural resources and ecologically sustainable development.
National Environmental Management Act (No 107 of 1998) (NEMA)	<p>The 2014 EIA Regulations have been promulgated in terms of Chapter 5 of NEMA. Listed activities which may not commence without EA are identified within the Listing Notices (GNR 327, GNR 325 and GNR 324) which form part of these Regulations (GNR 326).</p> <p>In terms of Section 24(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>DEA – Competent Authority</p> <p>Northern Cape DAEARD &amp; LR</p>	The listed activities requiring authorisation triggered by the proposed project have been identified and are being assessed as part of the EIA process for the Thermal Plant. The EIA process will culminate in the submission of a final EIA Report to the Competent Authority in support of the Application for Environmental Authorisation.



Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
	A Scoping and EIA Process is required to be undertaken for the proposed project.		
National Environmental Management Act (No 107 of 1998) (NEMA)	<p>In terms of the "Duty of Care and Remediation of Environmental Damage" provision in Section 28(1) of NEMA every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment.</p> <p>In terms of NEMA, it is the legal duty of a project proponent to consider a project holistically, and to consider the cumulative effect of a variety of impacts.</p>	DEFF Northern Cape DAEARD & LR	While no permitting or licensing requirements arise directly by virtue of the Thermal Plant in terms of this section, this general duty of care finds application through the consideration of potential cumulative, direct and indirect impacts.
Environment Conservation Act (No. 73 of 1989) (ECA)	<p>The Noise Control Regulations in terms of Section 25 of the ECA contain regulations applicable for the control of noise in the Provinces of Limpopo, North West, Mpumalanga, Northern Cape, Eastern Cape, and KwaZulu-Natal Provinces.</p> <p>The Noise Control Regulations cover the powers of a local authority, general prohibitions, prohibitions of disturbing noise, prohibitions of noise nuisance, use of measuring instruments, exemptions, attachments, and penalties.</p> <p>In terms of the Noise Control Regulations, no person shall make, produce or cause a disturbing noise, or allow it to be made, produced or caused by any person, machine, device or apparatus or any combination thereof (Regulation 04).</p>	DEFF Northern Cape DAEARD & LR  Gamagara Local Municipality	Noise is expected to be associated with the construction and operational phase of the project. Considering the remote location of the Thermal Plant, noise is unlikely to present a significant intrusion to the local community.

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
National Water Act (No. 36 of 1998) (NWA)	<p>A water use listed under Section 21 of the NWA must be licensed with the Regional DWS, unless it is listed in Schedule 1 of the NWA (i.e. is an existing lawful use), is permissible under a GA, or if a responsible authority waives the need for a licence.</p> <p>Water use is defined broadly, and includes consumptive and non-consumptive water uses, taking and storing water, activities which reduce stream flow, waste discharges and disposals, controlled activities (activities which impact detrimentally on a water resource), altering a watercourse, removing water found underground for certain purposes, and recreation.</p> <p>Consumptive water uses may include taking water from a water resource (Section 21(a)), and storing water (Section 21(b)).</p> <p>Non-consumptive water uses may include impeding or diverting of flow in a water course (Section 21(c)), and altering of bed, banks or characteristics of a watercourse (Section 21(i)).</p>	Regional Department of Water and Sanitation	A water use authorisation process has been initiated for the proposed groundwater abstraction (Section 21(a)) and alternation and impeding and/or diverting of a watercourse within the regulated area (Section 21(c) and Section (l)). Confirmation of this process is attached in Appendix B
Minerals and Petroleum Resources Development Act (No. 28 of 2002) (MPRDA)	<p>In accordance with the provisions of the MPRDA a mining permit is required in accordance with Section 27(6) of the Act where a mineral in question is to be mined, including the mining of materials from a borrow pit. Any person who wishes to apply for a mining permit in accordance with Section 27(6) must simultaneously apply for an Environmental Authorisation in terms of NEMA.</p> <p>Section 53 of the MPRDA states that any person who intends to use the surface of any land in any way which may be contrary to any object of the Act, or which is likely to impede any such object must apply to the Minister for</p>	Department of Mineral Resources	<p>No borrow pits are expected to be required for the construction of the project, and as a result a mining permit or EA is not required to be obtained in this regard.</p> <p>In terms of Section 53 of the MPRDA, approval is required from the Minister of Mineral Resources to ensure that the proposed project does not sterilise a mineral resource that might occur on</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
	approval in the prescribed manner.		the site.
National Environmental Management: Air Quality Act (No. 39 of 2004) (NEM:AQA)	<p>The List of Activities Which Result in Atmospheric Emissions Which Have or May Have A Significant Detrimental Effect on The Environment, Including Health, Social Conditions, Economic Conditions, Ecological Conditions or Cultural Heritage (GN 893) published under Section 21(1)b of the NEM: AQA prescribe the emissions standards for a number of listed activities deemed detrimental to the environment.</p> <p>In accordance with the Regulations (GN 893) any person who conducts any activity in such a way as to give rise to emissions in quantities and concentrations that may exceed the minimum emissions standards set out must, apply for an Air Emissions License (AEL).</p>	<p>DEFF</p> <p>Northern Cape DAEARD &amp; LR / John Taolo Gaetsewe District Municipality</p>	<p>The project is a new facility and does not yet have an AEL. As a gas-fired power station with capacity greater than 50 MW, the project will require an AEL to operate. Emissions from the power station will be required to comply with the new plant Minimum Emission Standards (MES). The applicable listed activities categories will include: Subcategory 1.4 (Gas Combustion Installations) and 2.4 (Storage and Handling of Petroleum Products). Listed activities defined in Section 21 of the NEM:AQA (as amended) require Environmental Authorisation – therefore triggering the Environmental Impact Assessment process - prior to the issuance of an AEL granting license to operate a facility that may impact ambient air quality.</p>
National Heritage Resources Act (No. 25 of 1999) (NHRA)	<p>Section 07 of the NHRA stipulates assessment criteria and categories of heritage resources according to their significance.</p> <p>Section 35 of the NHRA provides for the protection of all archaeological and palaeontological sites, and meteorites.</p> <p>Section 36 of the NHRA provides for the conservation and care of cemeteries and graves by SAHRA where this is not the responsibility of any other authority.</p> <p>Section 38 of the NHRA lists activities which require developers or any person who intends to undertake a listed activity to notify the responsible heritage resources authority and furnish it with details regarding the location,</p>	<p>South African Heritage Resources Agency</p>	<p>A Heritage Impact Assessment has been undertaken as part of the EIA process (refer to <b>Appendix H</b> of this EIA Report). From an archaeological perspective there are no areas that require avoidance or buffering. Relevant procedures, as detailed in the EMPr, are required to be implemented should any chance finds be encountered during construction.</p> <p>The project is in an area of moderate palaeontological sensitivity. The Fossil Finds Procedure as included in the EMPr must be implemented.</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
	<p>nature, and extent of the proposed development.</p> <p>Section 44 of the NHRA requires the compilation of a Conservation Management Plan as well as a permit from SAHRA for the presentation of archaeological sites as part of tourism attraction.</p>		
<p>National Environmental Management: Biodiversity Act (No. 10 of 2004) (NEM:BA)</p>	<p>Section 53 of NEM:BA provides for the MEC / Minister to identify any process or activity in such a listed ecosystem as a threatening process.</p> <p>Three government notices have been published in terms of Section 56(1) of NEM:BA as follows:</p> <ul style="list-style-type: none"> <li>» Commencement of TOPS Regulations, 2007 (GNR 150).</li> <li>» Lists of critically endangered, vulnerable and protected species (GNR 151).</li> <li>» TOPS Regulations (GNR 152).</li> </ul> <p>It provides for listing threatened or protected ecosystems, in one of four categories: critically endangered (CR), endangered (EN), and 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 (NEM:BA: National list of ecosystems that are threatened and in need of protection, (Government Gazette 37596, GNR 324), 29 April 2014).</p>	<p>DEFF</p> <p>Northern Cape DAEARD</p>	<p>Under NEM:BA, a permit would be required for any activity which is of a nature that may negatively impact on the survival of a listed protected species.</p> <p>No protected species were found within the project site that require rescue and relocation permits under NEMBA (refer to Terrestrial Biodiversity Report in Appendix D)</p>
<p>National Environmental Management: Biodiversity Act (No. 10</p>	<p>Chapter 5 of NEM:BA pertains to alien and invasive species, and states that a person may not carry out a restricted activity involving a specimen of an alien species</p>	<p>DEFF</p> <p>Northern Cape</p>	<p>No Alien plant species listed in terms of Chapter 5 of NEM: BA were identified within the project as per the findings of the Ecological Impact</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
of 2004) (NEM:BA)	<p>without a permit issued in terms of Chapter 7 of NEM:BA, and that a permit may only be issued after a prescribed assessment of risks and potential impacts on biodiversity is carried out.</p> <p>Applicable, and exempted alien and invasive species are contained within the Alien and Invasive Species List (GNR 864).</p> <p>Restricted activities and the respective requirements applicable to persons in control of different categories of listed invasive species are contained within the Alien and Invasive Species Regulations (GNR 598) published under NEM:BA, together with the requirements of the Risk Assessment to be undertaken.</p>	DAEARD	Assessment ( <b>Appendix D</b> of the EIA report). Any species identified must be managed in terms of the requirements of the Act.
Conservation of Agricultural Resources Act (No. 43 of 1983) (CARA)	<p>Section 05 of CARA provides for the prohibition of the spreading of weeds.</p> <p>Regulation 15 of GNR 1048 published under CARA provides for the classification of categories of weeds and invader plants, and restrictions in terms of where these species may occur.</p> <p>Regulation 15E of GNR 1048 published under CARA provides requirement and methods to implement control measures for different categories of alien and invasive plant species.</p>	The Department of Agriculture, Land Reform and Rural Development (DALRRD)	<p>CARA will find application throughout the life cycle of the project. In this regard, soil erosion prevention and soil conservation strategies need to be developed and implemented. In addition, a weed control and management plan must be implemented.</p> <p>The permission of DALRRD will be required if the project requires the draining of vleis, marshes or water sponges on land outside urban areas. However, this is not anticipated to be relevant for the project.</p> <p>In terms of Regulation 15E (GNR 1048) where Category 1, 2 or 3 plants occur a land user is required to control such plants by means of one or more of the following methods:</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
			<ul style="list-style-type: none"> <li>» Uprooting, felling, cutting or burning.</li> <li>» Treatment with a weed killer that is registered for use in connection with such plants in accordance with the directions for the use of such a weed killer.</li> <li>» Biological control carried out in accordance with the stipulations of the Agricultural Pests Act (No. 36 of 1983), the ECA and any other applicable legislation.</li> <li>» Any other method of treatment recognised by the executive officer that has as its object the control of plants concerned, subject to the provisions of sub-regulation (4).</li> <li>» A combination of one or more of the methods prescribed, save that biological control reserves and areas where biological control agents are effective shall not be disturbed by other control methods to the extent that the agents are destroyed or become ineffective.</li> </ul>
National Forests Act (No. 84 of 1998) (NFA)	<p>According to this Act, the Minister may declare a tree, group of trees, woodland or a species of trees as protected. Notice of the List of Protected Tree Species under the National Forests Act (No. 84 of 1998) was published in GNR 734.</p> <p>The prohibitions provide that "no person may cut, damage, disturb, destroy or remove any protected tree, or collect, remove, transport, export, purchase, sell, donate or in any other manner acquire or dispose of any protected tree, except under a licence granted by the Minister".</p>	DAFF	A licence is required for the removal of protected trees listed under the National Forests Act of 1998 (No 84 of 1998). The following NFA-listed tree species were identified within the project site <i>Vachellia erioloba</i> , <i>Vachellia haematoxylon</i> , and <i>Boscia albitrunca</i> . A walk-through of the PV facility and thermal generation facility site has already been undertaken during December 2020 and a permit application submitted.
National Veld and Forest Fire Act (No. 101	Chapter 4 of the NVFFA places a duty on owners to prepare and maintain firebreaks, the procedure in this	DAFF	While no permitting or licensing requirements arise from this legislation, this Act will be

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
of 1998) (NVFFA)	<p>regard, and the role of adjoining owners and the fire protection association. Provision is also made for the making of firebreaks on the international boundary of the Republic of South Africa. The applicant must ensure that firebreaks are wide and long enough to have a reasonable chance of preventing a veldfire from spreading to or from neighbouring land, it does not cause soil erosion, and it is reasonably free of inflammable material capable of carrying a veldfire across it.</p> <p>Chapter 5 of the Act places a duty on all owners to acquire equipment and have available personnel to fight fires. Every owner on whose land a veldfire may start or burn or from whose land it may spread must have such equipment, protective clothing and trained personnel for extinguishing fires, and ensure that in his or her absence responsible persons are present on or near his or her land who, in the event of fire, will extinguish the fire or assist in doing so, and take all reasonable steps to alert the owners of adjoining land and the relevant fire protection association, if any.</p>		<p>applicable during the construction and operation of the Thermal Facility, in terms of the preparation and maintenance of firebreaks, and the need to provide appropriate equipment and personnel for firefighting purposes.</p>
Hazardous Substances Act (No. 15 of 1973) (HAS)	<p>This Act regulates the control of substances that may cause injury, or ill health, or death due to their toxic, corrosive, irritant, strongly sensitising or inflammable nature or the generation of pressure thereby in certain instances and for the control of certain electronic products. To provide for the rating of such substances or products in relation to the degree of danger, to provide for the prohibition and control of the importation, manufacture, sale, use, operation, modification, disposal or dumping of such substances and products.</p> <p>» Group I and II: Any substance or mixture of a</p>	Department of Health (DoH)	<p>It is necessary to identify and list all Group I, II, III, and IV hazardous substances that may be on site and in what operational context they are used, stored or handled. If applicable, a license would be required to be obtained from the Department of Health (DoH). Hazardous substances (i.e. LPG) are anticipated to be stored on within the project site.</p>



Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
	<p>substance that might by reason of its toxic, corrosive etc., nature or because it generates pressure through decomposition, heat or other means, cause extreme risk of injury etc., can be declared as Group I or Group II substance</p> <ul style="list-style-type: none"> <li>» Group IV: any electronic product, and</li> <li>» Group V: any radioactive material.</li> </ul> <p>The use, conveyance, or storage of any hazardous substance (such as distillate fuel) is prohibited without an appropriate license being in force.</p>		
<p>National Environmental Management: Waste Act (No. 59 of 2008) (NEM:WA)</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"> <li>» Adding other waste management activities to the list.</li> <li>» Removing waste management activities from the list.</li> <li>» Making other changes to the particulars on the list.</li> </ul> <p>In terms of the Regulations published in terms of NEM:WA (GNR 912), a BA or EIA 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"> <li>» The containers in which any waste is stored, are intact and not corroded or in</li> <li>» Any other way rendered unfit for the safe storage of waste.</li> <li>» Adequate measures are taken to prevent accidental</li> </ul>	<p>DEFF – hazardous waste</p> <p>Northern Cape DAEARD – general waste</p>	<p>No waste listed activities are triggered by the project and therefore no Waste Management License is required to be obtained. General and hazardous waste handling, storage and disposal will be required during construction and operation. The National Norms and Standards for the Storage of Waste (GNR 926) published under Section 7(1)(c) of NEM:WA will need to be considered in this regard, if more than 100m<sup>3</sup> of general waste or 80m<sup>3</sup> for hazardous waste is to be generated by the project and stored on site at any one time. .</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
	<p>spillage or leaking.</p> <ul style="list-style-type: none"> <li>» The waste cannot be blown away.</li> <li>» Nuisances such as odour, visual impacts and breeding of vectors do not arise, and</li> <li>» Pollution of the environment and harm to health are prevented.</li> </ul>		
National Road Traffic Act (No. 93 of 1996) (NRTA)	<p>The technical recommendations for highways (TRH 11): "Draft Guidelines for Granting of Exemption Permits for the Conveyance of Abnormal Loads and for other Events on Public Roads" outline the rules and conditions which apply to the transport of abnormal loads and vehicles on public roads and the detailed procedures to be followed in applying for exemption permits are described and discussed.</p> <p>Legal axle load limits and the restrictions imposed on abnormally heavy loads are discussed in relation to the damaging effect on road pavements, bridges, and culverts.</p> <p>The general conditions, limitations, and escort requirements for abnormally dimensioned loads and vehicles are also discussed and reference is made to speed restrictions, power/mass ratio, mass distribution, and general operating conditions for abnormal loads and vehicles. Provision is also made for the granting of permits for all other exemptions from the requirements of the National Road Traffic Act and the relevant Regulations.</p>	<p>South African National Roads Agency (SANRAL) – national roads</p> <p>Northern Cape Department of Transport (DoT)</p>	<p>An abnormal vehicle permit may be required to transport various components of the transmission infrastructure to site for construction. These may include road clearances for vehicles carrying abnormally dimensioned loads (transport vehicles exceeding the dimensional limitations (length) of 22m).</p>
<b>Provincial Policies / Legislation</b>			
Northern Cape Nature Conservation Act, 2009 (Act No. 9 of 2009)	<p>This Act provides for the sustainable utilisation of wild animals, aquatic biota and plants; provides for the implementation of the Convention on International Trade in Endangered Species of Wild Fauna and Flora; provides</p>	<p>Northern Cape DAEARD</p>	<p>In the Terrestrial Biodiversity Report (<b>Appendix D</b>) seven (7) Protected Species under the NCNCA were identified within the project site. Permits from the Northern Cape DAEARD are required for</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
	<p>for offences and penalties for contravention of the Act; provides for the appointment of nature conservators to implement the provisions of the Act; and provides for the issuing of permits and other authorisations. Amongst other regulations, the following may apply to the current project:</p> <ul style="list-style-type: none"> <li>» Boundary fences may not be altered in such a way as to prevent wild animals from freely moving onto or off of a property</li> <li>» Aquatic habitats may not be destroyed or damaged</li> <li>» The owner of land upon which an invasive species is found (plant or animal) must take the necessary steps to eradicate or destroy such species</li> </ul> <p>The Act provides lists of protected species for the Province</p>		<p>removal of these species.</p>

» **International Guidelines**

**i) The Equator Principles III (June, 2013)**

The Equator Principles (EPs) III constitute a financial industry benchmark used for determining, assessing, and managing projects environmental and social risks. The EPs are primarily intended to provide a minimum standard for due diligence to support responsible risk decision-making. The EPs are applicable to large infrastructure projects and apply globally to all industry sectors.

The EPs comprise the following principles:

- Principle 1:** Review and Categorisation
- Principle 2:** Environmental and Social Assessment.
- Principle 3:** Applicable Environmental and Social Standards.
- Principle 4:** Environmental and Social Management System and Equator Principles Action Plan
- Principle 5:** Stakeholder Engagement
- Principle 6:** Grievance Mechanism
- Principle 7:** Independent Review
- Principle 8:** Covenants
- Principle 9:** Independent Monitoring and Reporting
- Principle 10:** Reporting and Transparency.

When a project is proposed for financing, the Equator Principle Financial Institution (EPFI) will categorise it based on the magnitude of its potential environmental and social risks and impacts.

Projects can be categorized as follows:

- Category A:** Projects with potential significant adverse environmental and social risks and/or impacts that are diverse, irreversible or unprecedented.
- Category B:** Projects with potential limited adverse environmental and social risks and/or impacts that are few in number, generally site-specific, largely reversible and readily addressed through mitigation measures.
- Category C:** Projects with minimal or no adverse environmental and social risks and/or impacts.

Based on the abovementioned criteria, the Thermal Generation Facility can be anticipated to be categorised as a Category B project.

Category A and Category B projects require that an assessment process be conducted to address the relevant environmental and social impacts and risks associated with the project. Such an assessment may include the following where applicable:

- » An assessment of the baseline environmental and social conditions.
- » Consideration of feasible environmentally and socially preferable alternatives.
- » Requirements under host country laws and regulations, applicable international treaties and agreements.
- » Protection and conservation of biodiversity (including endangered species and sensitive ecosystems in modified, natural and Critical Habitats) and identification of legally protected areas.
- » Sustainable management and use of renewable natural resources (including sustainable resource management through appropriate independent certification systems).
- » Use and management of dangerous substances.
- » Major hazards assessment and management.
- » Efficient production, delivery and use of energy.
- » Pollution prevention and waste minimisation, pollution controls (liquid effluents and air emissions), and solid and chemical waste management.
- » Viability of Project operations in view of reasonably foreseeable changing weather patterns/climatic conditions, together with adaptation opportunities.
- » Cumulative impacts of existing Projects, the proposed Project, and anticipated future Projects.
- » Respect of human rights by acting with due diligence to prevent, mitigate and manage adverse human rights impacts.
- » Labour issues (including the four core labour standards), and occupational health and safety.
- » Consultation and participation of affected parties in the design, review and implementation of the Project.
- » Socio-economic impacts.
- » Impacts on Affected Communities, and disadvantaged or vulnerable groups.
- » Gender and disproportionate gender impacts.
- » Land acquisition and involuntary resettlement.
- » Impacts on indigenous peoples, and their unique cultural systems and values.
- » Protection of cultural property and heritage.
- » Protection of community health, safety and security (including risks, impacts and management of Project's use of security personnel).
- » Fire prevention and life safety.

Such an assessment should propose measures to minimise, mitigate, and offset adverse impacts in a manner relevant and appropriate to the nature and scale of the proposed Project. In terms of the EPs South Africa is a non-designated country, and as such the assessment process for projects located in South Africa evaluates compliance with the applicable IFC Performance Standards on Environmental and Social Sustainability and the World Bank Group (WBG) EHS Guidelines (refer to the sections below).

The Thermal Generation Facility is currently being assessed in accordance with the requirements of the 2014 EIA Regulations, as amended (GNR 326), published in terms of Section 24(5) of the National Environmental Management Act (No. 107 of 1998) (NEMA), which is South Africa's national legislation providing for the authorisation of certain controlled activities. Through this assessment, all potential social and environmental risks are identified and assessed, and appropriate mitigation measures proposed.

## **ii) International Finance Corporation (IFC) Performance Standards on Environmental and Social Sustainability (January 2012)**

The International Finance Corporation (IFC), a division of the World Bank Group that lends to private investors, uses a Sustainability Framework (IFC, 2012), to promote sound environmental and social practices, encourage transparency and accountability, and contribute to positive development impacts.

The IFC Performance Standards (PS) on Environmental and Social Sustainability were developed by the IFC. The Performance Standards are directed towards clients, providing guidance on how to identify risks and impacts, and are designed to help avoid, mitigate, and manage risks and impacts as a way of doing business in a sustainable way, including stakeholder engagement and disclosure obligations of the client in relation to project-level activities. Together, the eight Performance Standards establish standards that the client is to meet throughout the life of an investment by IFC. The overall objectives of the IFC PS are:

- » To fight poverty.
- » To do no harm to people or the environment.
- » To fight climate change by promoting low carbon development.
- » To respect human rights;
- » To Promote gender equity;
- » To provide information prior to project development, free of charge and free of external manipulation;
- » To collaborate with the project developer to achieve the PS;
- » To provide advisory services; and
- » To notify countries of any Trans boundary impacts as a result of a Project.

The PS comprise of the following:

- Performance Standard 1:** Assessment and Management of Environmental and Social Risks and Impacts.
- Performance Standard 2:** Labour and Working Conditions.
- Performance Standard 3:** Resource Efficiency and Pollution Prevention.
- Performance Standard 4:** Community Health, Safety and Security.
- Performance Standard 5:** Land Acquisition and Involuntary Resettlement.
- Performance Standard 6:** Biodiversity Conservation and Sustainable Management of Living Natural Resources.
- Performance Standard 7:** Indigenous Peoples.
- Performance Standard 8:** Cultural Heritage.

Performance Standard 1 establishes the importance of:

- i). Integrated assessment to identify the social and environmental impacts, risks, and opportunities of projects.
- ii). Effective community engagement through disclosure of project-related information and consultation with local communities on matters that directly affect them.
- iii). The management of social and environmental performance throughout the life of a project through an effective Environmental and Social Management System (ESMS).

PS 1 requires that a process of environmental and social assessment be conducted, and an ESMS appropriate to the nature and scale of the project and commensurate with the level of its environmental and social risks and impacts be established and maintained. PS 1 is the overarching standard to which all the other standards relate. PS 2 through 8 establish specific requirements to avoid, reduce, mitigate or compensate for impacts on people and the environment, and to improve conditions where appropriate. While all relevant social and environmental risks and potential impacts should be considered as part of the assessment, PS 2 through 8 describe potential social and environmental impacts that require particular attention in emerging markets. Where social or environmental impacts are anticipated, the developer is required to manage them through its Environmental and Social Management System (ESMS) consistent with PS 1.

- iii) **The IFC Environmental Health and Safety (EHS) Guidelines**



The IFC EHS Guidelines are technical reference documents with general and industry specific examples of Good International Industry Practice (GIIP). The following IFC EHS Guidelines have relevance to the proposed project:

- » IFC EHS General Guidelines
- » IFC EHS Guidelines for Electric Power Transmission and Distribution
- » IFC EHS Guidelines for Thermal Power Plants

The General EHS Guidelines are designed to be used together with the relevant Industry Sector EHS Guidelines, which in this instance is the EHS Guideline for Thermal Power Plants. The application of the General EHS Guidelines should be tailored to the hazards and risks associated with a project and should take into consideration site-specific variables which may be applicable, such as host country context, assimilative capacity of the environment, and other project factors. In instances where host country regulations differ from the standards presented in the EHS Guidelines, whichever is the more stringent of the two in this regard should be applied.

The General EHS Guidelines include consideration of the following:

- » Environmental:
  - \* Air Emissions and Ambient Air Quality
  - \* Energy Conservation
  - \* Wastewater and Ambient Water Quality
  - \* Water Conservation
  - \* Hazardous Materials Management
  - \* Waste Management
  - \* Noise
  - \* Contaminated Land
- » Occupational Health and Safety:
  - \* General Facility Design and Operation
  - \* Communication and Training
  - \* Physical Hazards
  - \* Chemical Hazards
  - \* Biological Hazards

- \* Radiological Hazards
- \* Personal Protective Equipment (PPE)
- \* Special Hazard Environments
- \* Monitoring
- » Community Health and Safety:
  - \* Water Quality and Availability
  - \* Structural Safety of Project Infrastructure
  - \* Life and Fire Safety (L&FS)
  - \* Traffic Safety
  - \* Transport of Hazardous Materials
  - \* Disease Prevention
  - \* Emergency Preparedness and Response
- » Construction and Decommissioning:
  - \* Environment
  - \* Occupational Health & Safety
  - \* Community Health & Safety

The EHS Guidelines for Thermal Power Plants includes information relevant to combustion, gasification or pyrolysis processes fuelled by gaseous, liquid and solid fossil fuels and biomass and designed to deliver electrical or mechanical power, steam, heat, or any combination of these, regardless of the fuel type.

Industry specific EHS issues associated with thermal power plants considered in the Guideline are as follows:

- » Environment
  - \* Air emissions
  - \* Energy efficiency and Greenhouse Gas (GHG) emissions
  - \* Water consumption and aquatic habitat alteration
  - \* Effluents
  - \* Solid wastes
  - \* Hazardous materials and oil
  - \* Noise

- » Occupational Health and Safety
  - \* Non-ionizing radiation
  - \* Heat
  - \* Noise
  - \* Confined spaces
  - \* Electrical hazards
  - \* Fire and explosion hazards
  - \* Chemical hazards; and
  - \* Particulate matter
- » Community Health and Safety
  - \* Water Consumption
  - \* Traffic Safety

## Appendix(M) - Chance Find Procedure

## CHANCE FOSSIL FINDS PROCEDURE

CHANCE FOSSIL FINDS PROCEDURE: DEVELOPMENT OF A 75MW THERMAL DUAL FUEL FACILITY TO FORM PART OF A HYBRID GENERATION FACILITY, NEAR KATHU	
<b>Province &amp; region:</b>	NORTHERN CAPE, Kuruman District
<b>Responsible Heritage Management Authority</b>	SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Phone: +27 (0)21 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za
<b>Rock unit(s)</b>	Kalahari Group, consolidated older alluvial / pan / vlei deposits along the Vlermuisleegte
<b>Potential fossils</b>	Bones, teeth, horn cores of mammals as well as calcretised burrows (e.g. termite nests, plant root and stem casts) , non-marine molluscs
<b>EO protocol</b>	1. Once alerted to fossil occurrence(s): alert site foreman, stop work in area immediately (N.B. safety first!), safeguard site with security tape / fence / sand bags if necessary.
	2. Record key data while fossil remains are still <i>in situ</i> : <ul style="list-style-type: none"> <li>• Accurate geographic location – describe and mark on site map / 1: 50 000 map / satellite image / aerial photo</li> <li>• Context – describe position of fossils within stratigraphy (rock layering), depth below surface</li> <li>• Photograph fossil(s) <i>in situ</i> with scale, from different angles, including images showing context (e.g. rock layering)</li> </ul>
	3. If feasible to leave fossils <i>in situ</i> : <ul style="list-style-type: none"> <li>• Alert Heritage Management Authority and project palaeontologist (if any) who will advise on any necessary mitigation</li> <li>• Ensure fossil site remains safeguarded until clearance is given by the Heritage Management Authority for work to resume</li> </ul>
	3. If <i>not</i> feasible to leave fossils <i>in situ</i> (emergency procedure only): <ul style="list-style-type: none"> <li>• <i>Carefully</i> remove fossils, as far as possible still enclosed within the original sedimentary matrix (e.g. entire block of fossiliferous rock)</li> <li>• Photograph fossils against a plain, level background, with scale</li> <li>• Carefully wrap fossils in several layers of newspaper / tissue paper / plastic bags</li> <li>• Safeguard fossils together with locality and collection data (including collector and date) in a box in a safe place for examination by a palaeontologist</li> <li>• Alert Heritage Management Authority and project palaeontologist (if any) who will advise on any necessary mitigation</li> </ul>
	4. If required by Heritage Management Authority, ensure that a suitably-qualified specialist palaeontologist is appointed as soon as possible by the developer.
	5. Implement any further mitigation measures proposed by the palaeontologist and Heritage Management Authority
<b>Specialist palaeontologist</b>	Record, describe and judiciously sample fossil remains together with relevant contextual data (stratigraphy / sedimentology / taphonomy). Ensure that fossils are curated in an approved repository (e.g. museum / university / Council for Geoscience)

	collection) together with full collection data. Submit Palaeontological Mitigation report to Heritage Management Authority. Adhere to best international practice for palaeontological fieldwork and Heritage Management Authority minimum standards.
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