Draft Environmental Management Programme (EMPr)

Proposed Hotel Development on Erf 5206, Springbok

Compiled by:

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1. INTRODUCTION

1.1 Project description

The proposed development site is located on the south eastern outskirts of Springbok (refer to Figure 1 below). The site measures 1.4237 ha and is located on Erf 5206, Springbok.



Figure 1: Locality of the development site.

The development consists of a hotel with approximately 100 rooms and conference facilities for 300 guests.

This EMPr is applicable to all construction activities to be carried out on site, whether formal monitoring takes place or not. Operational recommendations are also made for the development once it has been completed.

1.2 Applicant details

NHE Development (Pty) Ltd

39 Rhodes Ave. Carters Glen KIMBERLEY 8301

<u>Contact person</u>: Mr Abdol Everyday Tel: 076 1448223 E-mail: abdol_everyday@yahoo.com

1.3 Objectives of the EMPr

The EMPr aims to fulfill the requirements as specified in Appendix 4 of Regulations No. R. 982 (4 December 2014) in terms of the National Environmental Management Act (Act 107 of 1998), with the following objectives:

- To identify, predict and evaluate actual and potential impacts on the environment, socio-economic conditions and cultural heritage, the risks and consequences and alternatives and options for mitigation of activities, with a view to minimizing negative impacts, maximizing benefits and promoting compliance with the principles of environmental management;
- To identify and employ the modes of environmental management best suited to ensuring that the activity is pursued in accordance with best environmental management practices;
- To be able to respond to unforeseen events;
- To provide feedback on compliance.

1.4 Implementation of the EMPr

- i) The Applicant may appoint a Project Manager to be responsible for the implementing and supervision of the EMPr. The Applicant will however have overall responsibility for ensuring that the provisions of the EMPr are implemented.
- The Conditions of the Environmental Authorisation and recommendations of the EMPr should be included in tenders and construction / operational contracts, where necessary.
- All contractors should be supplied with a copy of the EMPr and it should be ensured that construction and operational staff adhere to the mitigation measures.
- iv) An Environmental Control Officer (ECO) should be appointed by the Applicant / Project Manager prior to the commencement of construction activities.

1.5 Role of the ECO

The ECO will have the following responsibilities:

- Attendance of site meetings if deemed necessary by the ECO or Project Manager;
- Advising the Project Manager and contractors on environmental issues within the defined work areas;
- Assisting in finding environmentally acceptable solutions to development and construction problems;
- Inspecting the site at a frequency determined by the stage of the project to establish compliance with environmental provisions;
- Reviewing the site logbook with regard to records of site activities that may pertain to the environment;

- Recommending corrective action to the Project Manager where construction activities are not in compliance with the EMPr;
- Keeping diligent records of communication with the Project Manager; and
- Run induction courses on environmental awareness for contractors' staff and supervisors;
- Provide assistance on environmental issues;
- The ECO shall keep record of construction activities, problems identified and transgressions noted;
- Liaise with registered interested and affect parties during especially the construction phase of the project. After the construction phase their negotiations should revert to the developer and concessionaire if applicable.

1.6 Environmental Awareness Plan

During site establishment and before construction activities commence, the ECO will inform all contractors of the following:

- Point out the areas that are not to be impacted on and that require protection, if any;
- Explain the possible impacts as identified in the Basic Assessment Report;
- Inform construction staff of the conditions of the Environmental Authorisation and recommendations of the EMPr;
- Explain risks and emergency procedures;
- Impose an understanding of pollution and degradation of the environment that may result from the construction work;
- Advise on the importance of containing the footprint of the construction site; and
- Advise on the aims of rehabilitation, post construction.

The above should also be communicated to any new employees that join the team during the construction period.

2. PREPARATION OF THE EMPR

2.1 Person(s) who prepared the EMPr

Marguerite Cronje P.O. Box 29729 Danhof 9310 Tel: 082 7020547 E-mail: margueritecronje@gmail.com

2.2 Expertise of the person(s) who prepared the EMPr

Education:

- B.Sc. (Zoology), University of the Free State, South Africa, 2002
- B.Sc. Honnours (Zoology), University of the Free State, South Africa, 2003
- M.Sc. Diploma (Equine Science), University of Edinburgh, Scotland, UK, 2005
- Masters in Environmental Management, University of the Free State, South Africa, 2008

Experience:

 More than 10 years of environmental management experience through conducting Environmental Impact Assessments, compiling Environmental Management Plans and monitoring construction phases of various types of projects.

3. IMPACT MANAGEMENT ACTIONS & MITIGATION MEASURES

3.1 Planning / pre-construction phase

3.1.1 Site documentation

A copy of the EMPr and Environmental Authorisation should be available on site.

3.1.2 <u>Provision of Services</u>

All negotiations / approvals from the Nama Khoi Municipality regarding service infrastructure need to be in place.

3.1.3 Protected Plants

The site contains a high amount of protected species as listed in the Northern Cape Nature Conservation Ac (Act 9 of 2009) and permits must be obtained to remove these plants and that a significant portion of them be transplanted and utilized in the landscaping of the hotel development.

A walkthrough of the site should be done by a suitably qualified ecologist / botanist, to mark and map all protected plants on site. Transplanting of succulent and bulb species should be done adequately and establishment overseen by an ecologist or person with suitable qualifications.

3.1.4 Access Roads

Existing access roads should be utilized by construction vehicles. A new intersection with the R355 is proposed to create a new access. Any off-site new roads planned need to obtain approvals / Environmental Authorisations, if necessary.

3.1.5 Location of Contractor's Camp

The Project Manager and ECO must recommend and approve the location of any contractor's camp, which is the demarcated area where the contractor will establish offices, workshops and storage facilities, prior to its establishment.

In choosing a site for the camp:

- Choose as level an area as possible;
- If possible, the camp must be located within the construction site area.

Extension or movement of the construction camp must be agreed by the ECO.

If possible, the construction camp and site must only have one access route, which should be maintained in an adequate condition so as to minimise dust and erosion. Where possible, existing roads and tracks must be used, and upgraded to cope with the heavy construction plant.

3.1.6 Construction Employees

Construction workers should not be housed on site.

Designated eating areas are recommended, and clean water should be made available daily to workers on site.

3.1.7 <u>Sanitary Facilities</u>

An adequate number of self-contained chemical toilets must be established on site, which must be easily accessible to construction workers. The Contractors must supply toilet paper at all toilets and will be responsible for the maintenance and servicing.

Contractors must ensure that no spillage occurs when chemical toilets are cleaned, and that the contents are properly stored and removed off-site. A contingency plan for spills from toilets must be supplied by the Contractors and approved by the Project Manager and ECO.

Toilets must be placed outside areas susceptible to standing or flowing water, and siting must be done in consultation with the Project Manager and ECO.

Performing ablutions outside toilet is strictly prohibited.

3.1.8 Safety and Security

The contractors must comply with the Occupational Health and Safety Act, National Building Regulations and any other national, regional or local regulations with regard to safety on site. Construction contracts must include safety and security measures for staff.

Fire extinguishers must be available, where required.

Entrance control during construction may be required. Unauthorised entry to construction areas should not be allowed.

3.2 Construction phase

Table 1 below indicates the impact management aspects and recommended actions to be taken during the construction phase.

Item	Aspect	Mitigation Measure
1.	Excavations and	Trenching will be kept to a minimum through the use
	trenches	of a single trench for different services.
		• The planning and selection of trench routes will be
		undertaken in liaison with the ECO and cognisance
		must be given to minimise the potential for soil
		erosion, disturbance of indigenous vegetation, the
		pit-trapping of mammals, reptiles, amphibians,
		insects, etc.
		• Trench routes with permitted working areas will be
		clearly defined and marked beforehand with clear

Table 1: Construction Phase Mitigation

		indicators.
		• Trench lengths must be kept as short as practically
		possible.
		• Trenches must be refilled to flush with (or slightly
		higher to allow for settlement) the surrounding land
		surface to minimise erosion. Excess soil will be
		stockpiled in an appropriate manner.
		• After refilling, trenches and disturbed working areas
		must be planted with a suitable plant species and
		watered where practical.
2.	Topsoil stockpiles	Topsoil (top 300mm of natural soil including
		vegetation and organic matter) must be removed
		during site clearance for re-use in the final
		landscaping of the site.
		The Project Manager and ECO must identify a
		suitable site for stockpiling that is:
		 Removed from the working area;
		\circ In a sheltered position so that the soil will
		not be exposed to the effects of erosion;
		 Removed from drainage lines to minimise
		the risk of being washed away;
		 Removed from areas of indigenous
		vegetation; and
		\circ Removed from the base of a bank so that
		run-off from the top of the bank does not
		cause ponding of water along the stockpile.
		• Stockpiles must be neat, must not exceed 3m in
		height, and must be convex at the top to promote
		run-off.
		• Weeds appearing on stockpiled topsoil must be
		removed by hand before seeding.
		 For stockpiling of less than one month, temporary
		erosion measures must be implemented by means of
		a secured cover of hessian or other suitable

		alternative.
3.	Handling & storage	• All chemicals used during the development, including
	of materials	fuel for the construction vehicles, should be stored in
		proper storerooms or protected areas to prevent
		pollution.
		Oils and other potential pollutants must be disposed
		of an appropriate licensed site.
		• Vehicles should be serviced at designated areas, well
		above the 1:100 year flood line or within 100m from
		a watercourse. No oil, diesel or other chemicals may
		be spilled or discharged anywhere.
		No construction material shall be stockpiled on the
		surrounding vegetation.
		• Where applicable, the contractors must ensure that
		all relevant national, regional and local legislation
		regarding storage, transport, use and disposal of
		petroleum, chemical, harmful or hazardous
		substances and materials are adhered to, where
		necessary.
		• All environmental problems occurring on the site
		such as chemical spillage, wasteful water disposal,
		etc. should be reported to the Project Manager and
		ECO.
4.	Concrete mixing	• Mixing should be confined to an impervious and
		contained area.
		• Excess waste concrete should be disposed of at a
		lisensed landfill site.
5.	Waste management	• The contractor will be responsible for the removal of
	(all construction	construction waste.
	debris and domestic	• Suitable containers should be placed on site to
	waste produced	collect all solid waste. These should be emptied
	during the	regularly.
	construction phase)	• No littering is permitted. During the construction
		period the site shall be maintained in a neat and tidy

			condition.
		•	All solid waste produced during the construction
			phase should be disposed of at the nearest licensed
			landfill site.
		•	No dumping, burning or burying of waste may take
			place on site.
6.	Soil, erosion &	•	Construction activities may not be allowed to impact
	vegetation		surrounding areas.
		•	Storm water must be diverted from the construction
			works and must be managed in such a manner as to
			disperse runoff and to prevent the concentration of
			storm water flow.
		•	Measures to control erosion must always be applied.
		•	Weed control measures must be applied to eradicate
			noxious weeds.
		•	No fire wood may be collected in the veld.
7.	Drilling & blasting	•	If blasting is required, it is the sole responsibility of
	(if required)		the Contractors to obtain a blasting permit and abide
			by the conditions of the Explosives Act and the
			Inspector of Explosives.
		•	Blasting will only be permitted at such times as
			agreed by the Project Manager and ECO, in
			consultation with the Contractor, and must
			preferably occur at the same time each day.
		•	Charge sizes must be set so as to ensure that no
			damage is caused to surrounding areas. The
			Contractors must allow for good vibration
			monitoring equipment on site at all times during
			blasting operation and record keeping during
			blasting operations is of vital importance.
		•	Before doing any blasting, the relevant occupants /
			owners of surrounding land must be notified, and
			any concerns addressed.

8.	Dust control	 Appropriate dust suppression measures must be used when dust generation is unavoidable, e.g.
		dampening with water, particularly during prolonged periods of dry weather.
9.	Noise control	 Construction activities should be limited to normal working hours.
10.	Discovery of artefacts	 If <i>in situ</i> fossil material is exposed, archaeological material is uncovered, or graves are found as a result of excavations, the ECO and the specialist should be notified asap.

3.3 Post construction rehabilitation

3.3.1 Site Clean-up

The Contractor(s) must ensure that all structures, equipment, materials and facilities used for construction activities are removed upon completion of the project. The Contractor must clear and clean the construction site to the satisfaction of the Project Manager and ECO.

All waste, equipment, materials, etc. used during construction must be cleared from the site.

3.3.2 Landscaping

Protected plants and the species *Othonna sp. nova*, which were transplanted prior to construction, should be utilized in the landscaping of the hotel.

Alien weeds and invaders should be removed and monitored for reestablishment.

3.3.3 Erosion management

Rehabilitation of disturbed areas is important to help the recovery of the vegetation Compacted soils must be loosened to an appropriate depth to allow seed germination. Any barren soil patches should be paved or landscaped to avoid erosion during heavy thunder storms.

3.4 Operational phase

The following recommendations should be implemented during the operational phase of the development to ensure sustainability and best environmental practice:

- Energy efficient technologies and water use efficiency should be applied as far as possible.
- An alien plant control and a monitoring programme must be developed and implemented.
- The Municipality will collect solid waste on a weekly basis.
- Where possible, recyclable materials (glass and paper) should be separated from the general solid waste and taken to a recycling depot.

4. COMPLIANCE AND MONITORING

4.1 On-site Environmental Representative

Apart from the ECO, it is recommended that an Environmental Representative forms part of the Project Manager or Contractor's team and is available on site on a daily basis to perform visual checks of the site activities and acts as a liaison between contractors and the ECO.

4.2 Environmental Monitoring Reports / Audits

The ECO will compile monthly environmental monitoring reports, or as stipulated by the Department of Environment and Nature Conservation, which must be kept on site and made available for inspection to any relevant competent authority.

4.3 Non-conformance and Corrective Action

Issues of non-conformance noted by the ECO will be communicated to the Project Manager, who will be responsible for ensuring that the relevant parties are informed of the non-conformance and that appropriate corrective actions are taken where necessary.

Environmental issues will be addressed at regular site meetings between the ECO, Project Manager and Contractor. The ECO will present verbal reports of any environmental concerns or issues that have arisen, and corrective actions that have been taken. Outstanding corrective actions will be discussed and agreed at these meetings. Issues relating to complaints or comments received from the public will also be discussed at these meetings.

Minutes of these meetings will be prepared / approved by the Project Manager and copied to all attendees before the next meeting. The frequency of the site meetings

will be agreed by the ECO, Project Manager, the Contractors and other relevant parties prior to the commencement of the project.

4.4 Internal Review

Internal review of the EMPr will take place on an on-going basis by the ECO. Based on observations during site inspections and issues raised at the site meetings, the ECO shall determine whether any procedures require modification in order to improve the efficiency of the EMPr. Any changes or adjustments to the EMPr shall be registered in the records of the ECO. Therefore, adjustment and update of the original EMPr document is not required when these *ad hoc* changes are made. The ECO's records shall be available to the relevant authority, the Northern Cape Department of Environment and Nature Conservation, throughout the process and copies will be provided on request.

At the conclusion of the project, a final Environmental Monitoring Report for the constrution phase will be compiled and submitted to the Project Manger. It will outline the implementation of the EMPr, especially the site clearing and rehabilitation undertaken by the contractors before site handover.