

ENVIRONMENTAL MANAGEMENT PROGRAMME

Construction and Maintenance of Vodacom Cellular Base Station – Lephalale Army Base (BS135781)



1. DETAILS OF PERSON WHO PREPARED THE ENVIRONMENTAL MANAGEMENT PROGRAMME

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2. INTRODUCTION

In terms of the National Environmental Management Act of 1998 (Act No. 107 of 1998) activities related to the construction of cellular base stations and associated infrastructure may have an impact on the environment and it is imperative that precautions be taken to ensure that environmental damage is minimised. The purpose of the Environmental Management Programme (EMPr) is to give effect to precautionary measures, which are to be put in place for controlling the activities that take place on site during the construction & operational phases of a project and to serve as a working document concentrating specifically on certain activities with the purpose of reducing the danger of adverse impacts or effects on the environment.

The EMPr specifies procedures and practices, which should be implemented during construction activities, and monitored by an Environmental Control Officer (ECO) appointed by Vodacom.

The objectives of the EMPr are to:

- ightarrow Ensure that all pertinent environmental issues and the concerns of LEDET are addressed;
- → Determine environmental conditions and sensitivities of the site and areas outside that may be impacted on by the project;
- ightarrow Ensure acceptability of design and construction practices with respect to identified impacts and prescribed mitigation measures;
- → Provide strategies for obtaining and/or complying with all environmental approvals, permits and agreements, and to provide a monitoring program;
- → Integrate environmental strategies with all design and construction work; and
- → Provide input and strategies for environmental quality control and risk management during all phases of the project.

The EMPr presented here incorporates these components through the environmental design criteria and specifications for cellular base stations and associated infrastructure. To ensure the effective implementation of these criteria and specifications, Vodacom must

be committed to undertaking a program of environmental monitoring during the construction phase. An ECO must provide this service to the applicant. The ECO should ensure compliance with the requirements of the EMPr.

3. ENVIRONMENTAL DESIGN AND SPECIFICATIONS

The project involves the establishment of a telecommunication base station. Details are listed below:

Project Name: Vodacom Base Station: Lephalale Army Base

Project Description: Vodacom intends to construct a 30m Lattice type mast with antennae mounted onto the mast, and container housing associated equipment. The size of the base station (fenced area) in which the mast and associated equipment will be placed will measure $10m \times 12m (120m^2)$.

Project Location: The proposed site is located to the south of the Lephalale Army Base / Airfield, on the Remainder of the Farm Piquetberg 523 LQ, Lephalale area, Lephalale Municipality area (Co-ordinates: S 23°43'37.64" E 27°42'10.90").

4. **DEFINITIONS**

In this document, unless the context requires otherwise -

→ Pre-construction

Involves all facets for the preparation of the site for construction.

→ Construction

For the purpose of this document construction is defined as the erection of cellular structures and the installation of electronic equipment.

→ Post-construction / Operational

This phase includes the take-over of the site by the service provider and the period during which the structure is operational.

→ Decommissioning Phase

This phase includes dismantling of the cellular structure and the removal of equipment.

5. THE CONTRACT

The EMPr shall form part of the legal contract between Vodacom, the contractor and the subcontractors. Vodacom shall build the EMPr into all contracts and commit the contractors to make the EMPr part of any works subcontracted. Failing to adhere to the EMPr requirements shall lead to severe penalties to be levied against the contractor and/or subcontractors.

A commitment from Vodacom and its contractors and subcontractors are required on the following issues:

→ Always behave professionally on and off site;

- → Ensure quality of work done, technical and environmental;
- → Resolve problems and claims arising from construction and/or maintenance damage immediately to ensure a smooth flow of operations;
- → To use this EMPr for the benefit of all involved;
- → To preserve the natural environment by limiting destructive actions on site;

An agreement is to be signed by the contractors and/or subcontractors that:

- → He knows and understands the contents of the EMPr;
- ightarrow He is able and shall comply with all legislation pertaining to the nature of the work to be done and all things incidental thereto.

Vodacom will institute contractual measurements to ascertain that its contractors and/or subcontractors and representatives adhere to the environmental obligations agreed upon.

6. ENVIRONMENTAL CONSTRUCTION SUPERVISION (INCLUDING ENVIRONMENTAL AWARENESS PLAN)

An Environmental Control Officer (ECO) must be appointed to ensure that construction activities associated with the establishment of a base station will comply with environmental specifications and regulatory requirements, thus minimizing adverse biophysical and social impacts and resulting liabilities.

During construction, the ECO's key responsibility will be to ensure that the environmental management measures, controls, and specifications are properly implemented as per the terms and conditions issued by LEDET. Responsibilities will include:

- → Delivering environmental education and awareness to construction staff prior to and during on-site works;
- → Providing technical assistance on environmental matters to construction staff;
- ightarrow Inspecting all activities during construction to ensure compliance with terms and conditions of approvals; and
- → Documenting construction activities by notes and photographs.

7. ENVIRONMENTAL SPECIFICATIONS AND CONDITIONS

To assist in complying with the applicable national and municipal laws, regulations, permits, licenses and approvals, the following Environmental Specifications and Conditions have been drafted. These specifications are not exhaustive and are meant to clarify various regulatory requirements. In the event of a discrepancy between these guidelines and legislation and/or regulations, the latter shall apply or if regulations or laws are amended, the amended regulations may apply.

7.1 General Obligations during the Pre-Construction and Construction Phase

7.1.1 IMPACT: Infrastructure quality			
Activity	Mitigation Measures	Responsible	Time Frame
Specification of the design and materials to be utilised	The specification of the design and materials to be utilised in the construction of the cellular base station and associated infrastructure must comply with the minimum specification requirements as prescribed by Vodacom.	contractor responsible for	During planning/pre- construction phase

7.1.2 IMPACT: Infrastructure requirements specified in the Environmental Authorization (and other approvals)				
Activity	Activity	Responsible	Time Frame	
Requirements and recommendations specified in the Environmental Authorization (and other approvals)	Requirements and recommendations specified in the Environmental Authorization (and other approvals, i.e. Civil Aviation & Municipal Approvals). The mast will be painted red and white with night markings (navigational light on top of the mast) (as per Civil Aviation Authority specification).	Vodacom and contractor responsible for construction	During planning/pre- construction phase & construction phase	

7.1.3 IMPACT: Dust, Noise and Water Pollution			
Activity	Mitigation Measures	Responsible	Time Frame
Earthworks and vegetation clearance	Affected parties on or in the vicinity of the site, including in particular surrounding landowners and any official responsible for existing installations on the site, shall be advised in advance of unavoidable disturbances.	responsible for	During planning/pre- construction phase & construction phase

Activities that generate unavoidable disturbances through the creation of noise or dust must be limited to normal working hours in order to avoid complaints by the surrounding landowners. The contractor shall address any complaints.	
The contractor shall identify any water resource in the proximity of the site and shall ensure that drainage from construction areas is such that the clarity and quality of water is in no way affected by construction activities.	

7.1.4 IMPACT: Protection of Flora and Fauna			
Activity	Mitigation Measures	Responsible	Time Frame
Disturbance of fauna and flora by construction activities	Trampling and disturbance associated with construction activities should be limited to within five metres of the footprint of the site. Ensure minimal disturbance to the natural flora and fauna of the area.	responsible for construction	Construction phase

7.1.5 IMPACT: Litter				
Activity	Mitigation Measures	Responsible	Time Frame	
Littering by construction workers and construction debris	The contractor shall not permit work teams to litter tins, paper, glass etc. and construction debris. On completion of the project all litter and construction debris shall be removed from the site immediately. Under no circumstances shall litter and debris be buried or hidden on or near the site after project completion.	responsible for construction	Construction phase	

7.1.6 IMPACT: Blasti	Mitigation Measures	Responsible	Time Frame
Activity Blasting	The Contractor shall notify residents should blasting be required and shall adhere to the requirements of the Explosives Act, 1956. Notices shall be placed on site in order to inform the adjacent owners of blasting activities and the contractor shall give all potentially affected parties notice of his intent to execute any blasting work. Blasting will be done at appropriate times of the day to ensure that noise disturbance and vibrations are kept to a minimum, and blasting will be undertaken using appropriate techniques.	Contractor responsible for construction/sub-contractor responsible for blasting	Construction phase
	The contractor will be bound to ensure that blasting operations do not cause damage to property. The contractor shall also be obliged to ensure that the dangers of fly rock to people and properties are eliminated. The contractor shall keep a photographic record of the condition of the affected buildings or structures and shall acquire the signature of the surrounding owners/occupants agreeing to the condition of the structures.		

7.1.7 IMPACT: Excavations				
Activity	Mitigation Measures	Responsible	Time Frame	
Earthworks	Unless otherwise specified by the Vodacom Environmental Representative, topsoil shall be stockpiled separately from the base course material. Fill slopes are to be allowed to slump to their naturally occurring slope and cut embankments are to be cut back to a 1:3 slope. All	responsible for construction	Construction & Rehabilitation phase	

slopes are to be covered by a minimum of 200mm depth of topsoil during the rehabilitation phase of the project.			
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7.1.8 IMPACT: Surfacing material			
Activity	Mitigation Measures	Responsible	Time Frame
Surfacing	Surfacing material selected shall be compatible with the surrounding environment.	Contractor responsible for construction	Construction & Rehabilitation phase

7.1.9 IMPACT: Historical Sites and Objects				
Activity	Mitigation Measures	Responsible	Time Frame	
Earthworks and vegetation clearance	The possibility of the occurrence of subsurface archaeological finds cannot be excluded. Therefore, if during construction any possible finds such as stone tool scatters, artefacts or bone and fossil remains are made, the operations must be stopped and a qualified archaeologist must be contacted for an assessment of the find and therefor the following chance find procedures should be put in place: This procedure applies to the developer's permanent employees, its subsidiaries, contractors and subcontractors, and service providers. The aim of this procedure is to establish monitoring and reporting procedures to ensure compliance with this policy and its associated procedures. Construction crews must be properly inducted to ensure they are fully aware of the procedures regarding chance finds as discussed below. • If during the pre-construction phase, construction, operations or closure phases of this project, any person employed by the developer,	construction	During pre-construction phase & construction phase	

one of its subsidiaries, contractors and subcontractors, or service provider, finds any artefact of cultural significance or heritage site, this person must cease work at the site of the find and report this find to their immediate supervisor, and through their supervisor to the senior on-site manager.

- It is the responsibility of the senior on-site Manager to make an initial assessment of the extent of the find and confirm the extent of the work stoppage in that area.
- The senior on-site Manager will inform the ECO of the chance find and its immediate impact on operations. The ECO will then contact a professional archaeologist for an assessment of the finds who will notify the SAHRA.

Chance find protocol for Palaeontology:

- 1. The following procedure is only required if fossils are seen on the surface and when clearing and excavations commence.
- 2. When excavations begin the rocks must be given a cursory inspection by the environmental officer or designated person. Any fossiliferous material (plants, trace fossils or bone) should be put aside in a suitably protected place. This way the project activities will not be interrupted.
- 3. Photographs of similar fossils must be provided to the developer to assist in recognizing the fossil plants, vertebrates, invertebrates or trace fossils in the shales and mudstones. This information will be built into the EMP's training and awareness plan and procedures.

- 4. Photographs of the putative fossils can be sent to the palaeontologist for a preliminary assessment.
- 5. If there is any possible fossil material found by the developer then the qualified palaeontologist sub-contracted for this project, should visit the site to inspect the selected material and check the dumps where feasible.
- 6. Fossil plants or vertebrates that are considered to be of good quality or scientific interest by the palaeontologist must be removed, catalogued and housed in a suitable institution where they can be made available for further study. Before the fossils are removed from the site a SAHRA permit must be obtained. Annual reports must be submitted to SAHRA as required by the relevant permits.
- 7. If no good fossil material is recovered then no site inspections by the palaeontologist will be necessary. A final report by the palaeontologist must be sent to SAHRA once the project has been completed and only if there are fossils.
- 8. If no fossils are found and the excavations have finished then no further monitoring is required.

The following conditions as required by SAHRA are to be adhered to in the case of any heritage resources find:

• If any newly discovered heritage resources during construction and operation phases of the proposed development, prove to be of archaeological or palaeontological significance a Phase 2 rescue operation might be necessary, and a permit will be needed before mitigation is

carried out. You may contact SAHRA APM Unit for further details: (Nokukhanya Khumalo/John Gribble 021 202 8652). • If any unmarked human burials are uncovered then please contact the SAHRA BGG Unit (Itumeleng Masiteng/Mimi Seetelo 012 320)	
 8490). A professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the findings at the expense of the developer. If the newly discovered heritage resources prove to 	
be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required at the expense of the developer.	

7.1.10 IMPACT: Site Access Road			
Activity	Mitigation Measures	Responsible	Time Frame
Construction vehicles making use of the access road to the construction site	The access road to the construction site as well as the installation of new gates in fence lines shall be established in consultation with the landowner. Vehicles are to make use of existing roads and tracks as far as possible. Access to the site used by the contractor shall be maintained during construction to avoid dust. The area affected by the access road, turning circles and parking of vehicles around the site shall be minimised. Vehicles shall adhere to the designated roads and areas and not be allowed to depart from it. The contractor shall implement the rehabilitation of the area affected by the construction vehicles.	Contractor responsible for construction	Construction phase

7.1.11 IMPACT: Stormwater Management			
Activity	Mitigation Measures	Responsible	Time Frame
Stormwater Management	Before the commencement of construction, the ECO shall indicate which stormwater measures should be applied during the construction of the cellular base station and associated infrastructure. During construction and particularly during the rainy season, berm walls shall be installed around the stockpiled areas on the site to prevent stormwater depositing this material onto adjacent properties or roads. The contractor and subcontractors shall adhere to the recommendations of the ECO and the design specifications.	ECO and contractor responsible for construction	During planning/pre- construction phase & construction phase

7.1.12 IMPACT: Servicing of Vehicles and Equipment on Site				
Activity	Mitigation Measures	Responsible	Time Frame	
Servicing of Vehicles and Equipment on Site	No servicing of vehicles is to be permitted on site. Servicing of equipment may take place on site but only when unavoidable, such as generators. In this case, all steps must be taken to ensure that no oil is spilt and that all waste, such as filters, is removed from the site and disposed in an environmentally legal manner.	Contractor responsible for construction	Construction phase	

7.1.13 IMPACT: Noise from generator			
Activity	Mitigation Measures	Responsible	Time Frame
Temporary Power Supply	Should a generator be deployed such generator shall comply with the maximum noise levels as stipulated in the Noise Control Regulations published under the Environment Conservation Act, 1989 (Act No 73 of 1989).	Contractor responsible for construction	Construction phase

7.1.14 IMPACT: Fires				
Activity	Mitigation Measures	Responsible	Time Frame	
Fires	No open fires shall be allowed in the veld under any circumstances. The contractor shall ensure that adequate fire fighting equipment, fit for purpose and reasonable in the circumstances, is available on site at all times. All personnel on the site shall be trained in the use of such equipment.	responsible for construction	Construction phase	

7.1.15 IMPACT: Cooking and Washing Facilities			
Activity	Mitigation Measures	Responsible	Time Frame
Cooking and Washing Facilities	Ensure that safe and adequate provisions are made for the contractor's personnel to cook and wash without creating risks of fire and water pollution. If methane gas is used, care should be taken to ensure that no leakage or risk of explosion exists.	responsible for construction	Construction phase

7.2 Construction Camp

The contractor shall pay specific attention to the following aspects:

7.2.1 IMPACT: Staff Facilities				
Activity	Mitigation Measures	Responsible	Time Frame	
Construction camp	Define the area of the construction camp and place it so as to have minimal impact on the environment.		During planning/pre- construction phase & construction phase	

7.2.2 IMPACT: Workers Accommodation				
Activity	Mitigation Measures	Responsible	Time Frame	
Workers Accommodation	Make suitable arrangements for accommodating the workers in a designated area that has been approved by the landowner and ECO.		During planning/pre- construction phase & construction phase	

7.2.3 IMPACT: Ablution Facilities				
Activity	Mitigation Measures	Responsible	Time Frame	
Ablution Facilities	Should existing toilet facilities not be available on or near the construction site, such facilities shall be supplied and maintained for the use of the contractor's staff. Regular inspections shall be carried out to ensure toilets are kept in a hygienic state. Toilet paper shall be supplied to all toilets. Staff shall be advised to the fact that they should use these toilets at all times.	Contractor responsible for construction	Construction phase	

7.2.4 IMPACT: Security and Privacy of surrounding properties			
Activity	Mitigation Measures	Responsible	Time Frame
Activities of construction workers	During the construction period the inconvenience to the surrounding property owners should be kept to an absolute minimum. The management of workers during construction is essential to avoid intrusion of people's privacy and properties. Define the area of the construction camp in such a manner as to limit the movement of site personnel.	responsible for	Construction phase

7.2.5 IMPACT: Water Supply				
Activity	Mitigation Measures	Responsible	Time Frame	
Water Supply	Agree upon the source of water supply with the ECO and the landowner.	Contractor responsible for construction	During planning/pre- construction phase & construction phase	

7.2.6 IMPACT: Solid Waste Disposal			
Activity	Mitigation Measures	Responsible	Time Frame
Solid Waste Disposal	Agree upon the method of waste disposal with the ECO. Particular attention shall be given to the disposal of solvents and other products used in the painting as well as any plastic components used in electrical wiring. The collection point for waste material shall be an enclosed structure to eliminate the risk of wind scatter. All waste must be disposed to a previously identified, registered or permitted waste disposal site.	responsible for construction	During planning/pre- construction phase & construction phase

7.3 Cellular Installation Site

The contractor shall pay specific attention to the following aspects:

Activity	Mitigation Measures	Responsible	Time Frame
Site Clearance and Leveling	Clear the area of the site paying specific attention to the specifications of the EMPr. Level the area of the site and remove any surplus material from the site. Topsoil should be stockpiled to be used in the rehabilitation process.	responsible for	Construction phase & Rehabilitation phase

7.3.2 IMPACT: Foundation			
Activity	Mitigation Measures	Responsible	Time Frame
Foundation Preparation	Material emanating from the excavation of foundations should be stockpiled for later use in the rehabilitation of the site. When casting concrete foundations, care must be taken to avoid spilling concrete on the site. Any material spilled must be collected and disposed of with the other waste from the site. Ensure that no erosion of the foundation takes place, especially if gravel is used beyond the perimeter of the fence for the leveling of the foundation. All fill originating from the site shall be leveled and incorporated into the surroundings and rehabilitated in such a way that it blends in with the surrounding natural environment. All excess construction material shall be removed from the site by the contractor and disposed to a previously identified waste disposal site as approved by the ECO.	Contractor responsible for construction	Construction & Rehabilitation phase

Activity	Mitigation Measures	Responsible	Time Frame
Use of herbicides and insecticides to protect the installations	Should it be necessary to make use of herbicides and insecticides to protect the installations, the application of such chemicals shall be restricted to the base station site.	Contractor responsible for construction	Construction phase
	The application of the herbicides and insecticides shall be done in accordance with the stipulations of The Fertilizers, Farm Feeds, Agricultural Remedies and Stock Remedies Act No 36 of 1947.		
	The contractor applying any herbicides and insecticides shall be in possession of a Pest Control Operator (PCO) license.		
	The application of the chemicals shall not exceed the prescribed dosage for the specific product used.		
	In all instances the application of the herbicides and insecticides should be of such nature that it will not cause any environmental harm.		

Activity	Mitigation Measures	Responsible	Time Frame
Fencing and Security of the Sites	When required in terms of the Specific Conditions of the Environmental Authorization a security fence shall be erected around the site.		Construction phase
	Lighting of the site shall be done in such a way that it will not be an inconvenience to surrounding landowners.		

7.3.5 IMPACT: Sourcing Materials from the Site			
Activity	Mitigation Measures	Responsible	Time Frame
Sourcing Materials from the Site	The contractor shall store sand, stone and cement in a demarcated area and care shall be taken not to allow any materials to spill beyond the site. Concrete mixing shall take place in a defined area and on top of boarding or sheeting so as to protect the ground. These boards and/or sheeting shall be removed from the site once the mixing is complete. Any spillage or overrun of material, which may occur, must be cleaned and removed from the site by the contractor.	responsible for	Construction phase

7.3.6 IMPACT: Chemical, Fuel, and Oil Handling			
Activity	Mitigation Measures	Responsible	Time Frame
Chemical, Fuel, and Oil Handling	All Contractors shall ensure that an emergency cleanup program is in place in event of an accidental spill or leak of fuel, oil or chemicals. Spillage of oil from crankcase oil draining or other such activities shall be prevented. If an accident occurs and fuels, oils or chemicals are spilled or dumped on the ground, the affected soil shall be removed, placed in drums and disposed of in compliance with national legislation. Disposal and storage of materials such as water, rags, and pads, containing oils, filters, chemicals, liquid fuels, lubricating oils, or other potentially hazardous materials shall be in a manner satisfactory to the ECO.	Contractor	Construction phase

Hazardous chemicals, fuels, and other noxious or toxic substances shall be stored in covered containers in fenced areas for security reasons.	
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Activity	Mitigation Massures	Dognoneible	Time a Funna
Activity	Mitigation Measures	Responsible	Time Frame
Structure Assembly	An area shall be defined by the contractor to allow for the assembly of the mast. This must take into account the need for off-loading or the component parts and positioning of the crane on solid ground for the final erection of the mast. This shall be planned to require the minimal removal of vegetation or risk of damage to the surrounding structures.	responsible for construction	Construction phase

7.3.8 IMPACT: Priming and Painting			
Activity	Mitigation Measures	Responsible	Time Frame
Priming and Painting	Care must be taken by the contractor to avoid the spillage of painting and solvent material on site. Adequate containers for cleaning of equipment and for the storage of waste products must be provided and all waste products resulting from the painting operation must be entirely removed from the site by the contractor.	responsible for construction	Construction phase

7.3.9 IMPACT: Waste from Electrical Connections			
Activity	Mitigation Measures	Responsible	Time Frame
Work on Electrical Connections	All waste products resulting from electrical connections must be removed from the site by the contractor.		Construction phase

7.3.10 IMPACT: Visual Impacts of construction activities			
Activity	Mitigation Measures	Responsible	Time Frame
Visual Impacts of construction activities	The contractor shall ensure that the visual impact of the construction activities is minimised. Construction activities should be kept clustered on site. Due to the fact that the infrastructure in question will be a 30m high mast located on a game farm, it is deemed important that the visual impact be minimized. The proposed mast will be a lattice mast and one can look "through" it. The mast is located approx. 100m to the south of the existing infrastructure of the Lephalale Army Base / Airfield. This will assist to lessen the visual impact. Vodacom will implement elements of good visual design. The mast will be painted red and white with night markings (navigational light on top of the mast) (as per Civil Aviation Authority specification).	Contractor responsible for	Construction phase

7.3.11 IMPACT: Rehabilitation				
Activity	Mitigation Measures	Responsible	Time Frame	
Rehabilitation	When the civil and construction work is complete, the site shall be cleaned and rehabilitated by the contractor.	Contractor responsible for construction	Construction & Rehabilitation phase	
	All waste materials, infrastructure, equipment, plant and other items used during the construction shall be removed from the site. No burial of any foreign material on the site shall be allowed.			
	Areas devoid of vegetation or where spoils have been compacted shall be covered with topsoil and if			

necessary, be seeded, in order to allow for the vegetation to re-establish.		
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7.4 Post-Construction and Operational Phases

This phase will determine the ultimate success of the implementation of the management proposals of the EMPr. A post construction environmental audit is to be conducted by the ECO in order to ensure that all conditions of the EMPr have been adhered to.

7.4.1 IMPACT: Servicing and Maintenance					
Activity	Mitigation Measures	Responsible	Time Frame		
Servicing and Maintenance	Herbicides and Insecticides should be applied according to the specifications of this EMPr and within the prescribed dosage. Where repainting has been undertaken, all waste materials shall be removed from the site. Existing access roads to the site shall be used. Where such roads have been damaged by erosion, repairs shall be undertaken to avoid further damage of the road and the surrounding environment.	Contractor responsible for maintenance of the site	Post-Construction and Operational Phases		

7.5 Decommissioning Phase

7.5.1 IMPACT: Decommissioning of the site				
Activity	Mitigation Measures	Responsible	Time Frame	
Decommissioning of the cellular base station	Should a cellular base station be decommissioned this process shall comply with the stipulations of the Occupational Health and Safety Act (Act 85 of 1993). The decommissioned structures shall be	contractor	Decommissioning Phase	

removed from the site.	the base station	
When a new structure is to be erected on the same site, the contractor shall comply with all the conditions as set out in the EMPr.		
When the site is no longer required, the area of the base station shall be rehabilitated to conform to the immediate surrounding environment.		

8. AMENDMENTS TO THE EMPr

Any issues that may arise during the construction or operational phase which are not covered in this EMPr shall be addressed as addendums to the EMPr and submitted for approval prior to implementation.