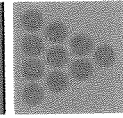


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**ESKOM HOLDINGS SOC LIMITED**

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**Basic Assessment (BA) and  
Environmental Management Programme  
(EMPr) for the proposed Mookodi  
Integration Phase 2 132kV power lines  
near Vryburg, North West Province  
Draft Environmental Management  
Programme (EMPr)**

**Mookodi-Magopela Power Line:**

DEA Ref. No.: 14/12/16/3/3/1/678; NEAS Ref. No.: DEA/EIA/0001400/2012


**Bophirima-Schweizer-Reneke Power Line**

DEA Ref. No.: 14/12/16/3/3/1/679; NEAS Ref. No.: DEA/EIA/0001401/2012

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**ESKOM HOLDINGS SOC LIMITED**

**BASIC ASSESSMENT (BA) AND ENVIRONMENTAL  
MANAGEMENT PROGRAMME (EMPr) FOR THE PROPOSED  
MOOKODI INTEGRATION PHASE 2 132kV POWER LINES NEAR  
VRYBURG, NORTH WEST PROVINCE**

**DRAFT ENVIRONMENTAL MANAGEMENT PROGRAMME**

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## **Glossary of Terms:**

**Construction Phase:** The activities pertaining to the preparation for and the physical construction of the proposed development.

**Contractor:** Persons/organisations contracted by Eskom to carry out parts of the work for the proposed development.

**Decommissioning:** Means 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.

**Engineer (E) / Project Manager (PM):** Person/organisation appointed by the Contractor to oversee the work of all consultants, sub-developers, contractors, residents and visitors.

**Environment:** NEMA defines "environment" as "the surroundings within which humans exist and that are made up of the land, water and atmosphere of the earth; micro-organisms, plant and animal life; any interrelationships among and between them and the physical, chemical aesthetic and cultural properties and conditions that influence human health and well-being".

**Environmental Control Officer (ECO):** Person/organisation appointed by the Contractor who will provide direction to the Project Manager concerning the activities within the Construction Zone, and who will be responsible for conducting the environmental audit of the project during the construction phase of the project according to the provisions of the Environmental Management Programme.

**Environmental Management Programme (EMPr):** The EMPr is a detailed plan for the implementation of the mitigation measures to minimise negative environmental impacts during the life-cycle of a project. The EMPr contributes to the preparation of the contract documentation by developing clauses to which the contractor must adhere for the protection of the environment. The EMPr specifies how the construction of the project is to be carried out and includes the actions required for the Post-Construction Phase to ensure that all the environmental impacts are managed for the duration of the project's life-cycle.

**Operational Phase (Post Construction):** The period following the Construction Phase, during which the proposed development will be operational.

**Pre-Construction Phase:** The period prior to commencement of the Construction Phase, during which various activities associated with the preparation for the Construction Phase will be undertaken.

**Rehabilitation:** Rehabilitation is defined as the return of a disturbed area to a state which approximates the state (where possible) which it was in before disruption. Rehabilitation for the purposes of this specification is aimed at post-reinstatement re-vegetation of a disturbed area and the insurance of a stable land surface. Re-vegetation should aim to accelerate the natural succession processes so that the plant community develops in the desired way, i.e. promote rapid vegetation establishment.

**Site Manager:** The person, representing the Contractor, responsible for all the Contractor's activities on the site including supervision of the construction staff and activities associated with the Construction Phase. The Site Manager will liaise with the Project Manager in order to ensure that the project is conducted in accordance with the Environmental Management Programme.

**Abbreviations:**

BA	Basic Assessment
C	Contractor
EA	Environmental Authorisation
ECO	Environmental Control Officer
ELO	Environmental Liaison Officer
EMPr	Environmental Management Programme
I&APs	Interested and Affected Parties
kV	Kilovolt
MC	Main Contractor
SO	Safety Officer
PM	Project Manager
MSDS	Material Safety Data Sheets

**ESKOM HOLDINGS SOC LIMITED**

**BASIC ASSESSMENT (BA) AND ENVIRONMENTAL  
MANAGEMENT PROGRAMME (EMPr) FOR THE PROPOSED  
MOOKODI INTEGRATION PHASE 2 132kV POWER LINES AND  
GANYESA SUBSTATION NEAR VRYBURG, NORTH WEST  
PROVINCE**

**DRAFT ENVIRONMENTAL MANAGEMENT PROGRAMME**

## **1 INTRODUCTION**

Eskom Holdings SOC Limited (hereafter referred to as Eskom) is proposing to construct 132kV power lines near Vryburg in the North West Province. As such, Eskom has appointed SiVEST as the independent Environmental Assessment Practitioner (EAP) to undertake the required Basic Assessment (BA) process for the above-mentioned proposed project.

Eskom has initiated the proposed project in order to improve the reliability of the network and create capacity for new customers in the greater Vryburg area. This project is the second phase of the Mookodi Integration project, which is being proposed to integrate the new Mookodi Main Transmission Substation (MTS), currently under construction, south of Vryburg, into the network. The network in the area is currently unstable, therefore the proposed development will help regulate and strengthen the network, should the Department of Environmental Affairs (DEA) grant an Environmental Authorisation (EA). In addition, there is mining potential in the area north of Vryburg and the proposed project would help supply electricity to these areas.

This EMPr has been compiled in line with the recommendations from the Basic Assessment (BA) being undertaken for the proposed project, as well as from issues identified by SiVEST Environmental Division. This EMPr will be updated with the conditions of the Environmental Authorisation (if approved) and re-submitted to the DEA for final approval prior to the commencement of construction on the project site. Additional details will also be provided by the appointed contractors and engineers once the detailed design has been completed.

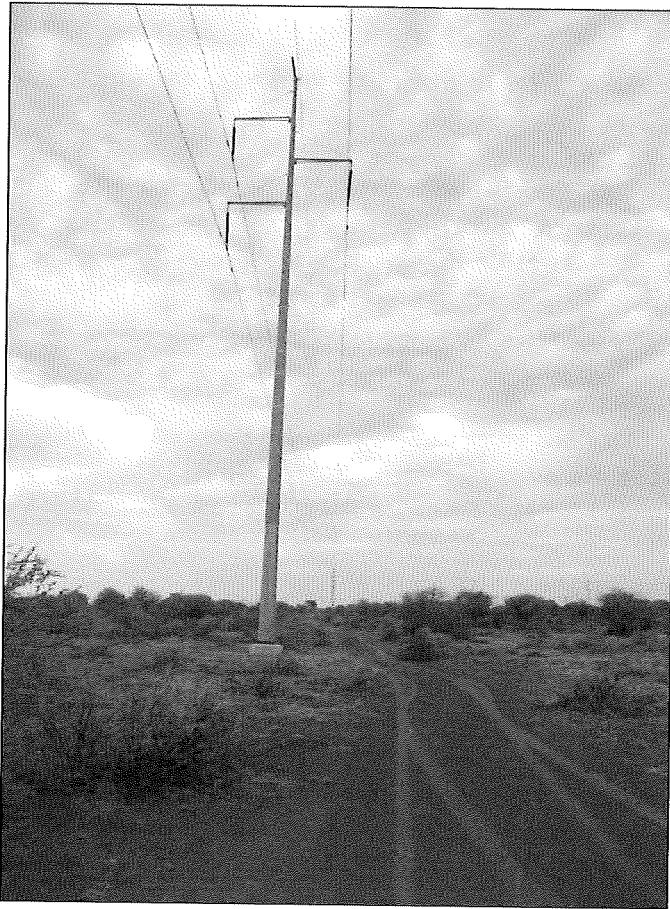


## 1.1 Overview of the proposed project

The proposed Mookodi Integration Phase 2 project consists of the following components:

- **Mookodi-Magopela Power Line**
  - Construction of a 132kV Power Line from the proposed Mookodi MTS to the existing Magopela Substation.
  - Upgrade of Magopela Substation to accommodate the additional incoming line.
  - Construction of an access track along the power line servitude.
  - Establishment of associated infrastructure as required by Eskom.
  
- **Bophirima-Schweizer Power Line**
  - Construction of a 132kV power line from the proposed Bophirima Substation to the existing Schweizer-Reneke Substation.
  - Upgrade of Schweizer-Reneke Substation to accommodate the additional incoming line.
  - Construction of an access track along the power line servitude.
  - Establishment of associated infrastructure as required by Eskom.

The study area is located within the North West Province near the town of Vryburg. The proposed power lines traverse three separate local municipal areas which all form part of the Dr Ruth Segomotsi Mompati District Municipality. Both proposed power line routes are situated within the Naledi Local Municipality. In addition, the proposed Bophirima-Schweizer power line traverses the Mamusa Local Municipality in the eastern part of the study area and the proposed Mookodi-Magopela power line is partly located within the Greater Taung Local Municipality.



**Figure 1: Tower Type**

The exact location of the towers will also be determined during the final design stages of the power line.

The power line will consist of a series of towers located approximately 200m apart. It is proposed that the steel monopole tower type (e.g. ESKOM, D-DT 7649), that is bird-friendly, would be used for the proposed power line in combination with other towers (e.g. guyed steel lattice tower types) at bend points and where greater distances need to be spanned. The steel monopole tower type is between 18 and 25m in height and each tower will have a footprint of between 0.8m<sup>2</sup> and 1.2m<sup>2</sup> (without stays). The exact location of the towers will be determined during the final design stages of the power line. A photograph of the steel monopole tower type is indicated below.

Various 1km wide route corridor alternatives were assessed, during the Basic Assessment for each proposed 132kV power line. These preferred alternatives for each component are provided below:

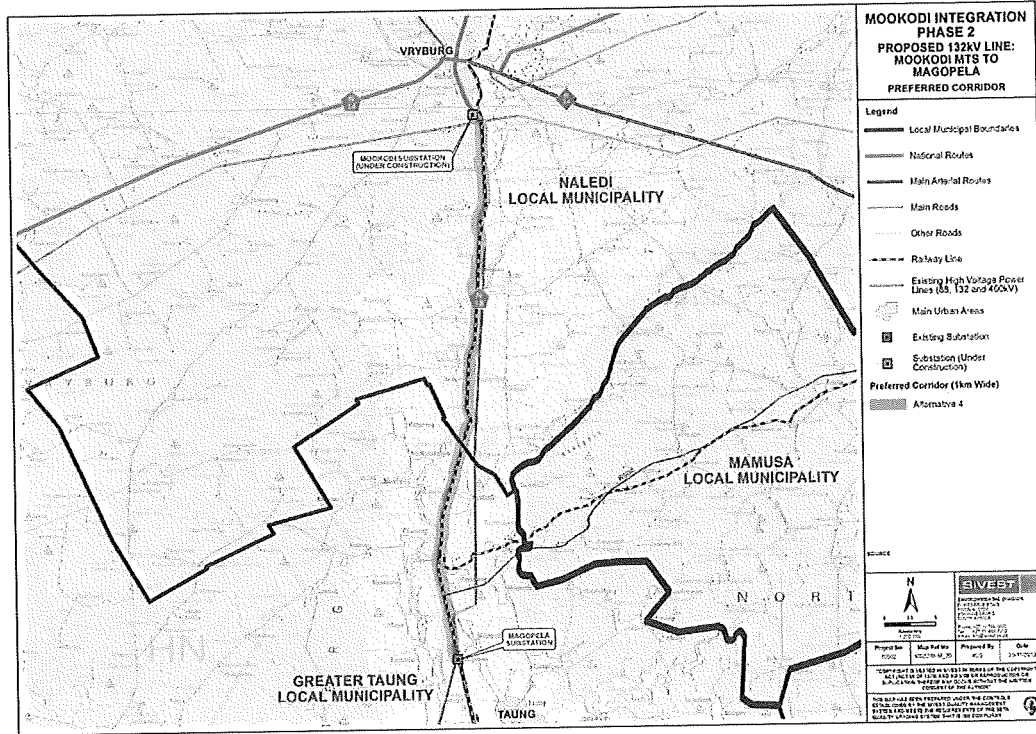


Figure 2: Locality Map – Preferred 132kV power line from Mookodi MTS to Magopela Substation

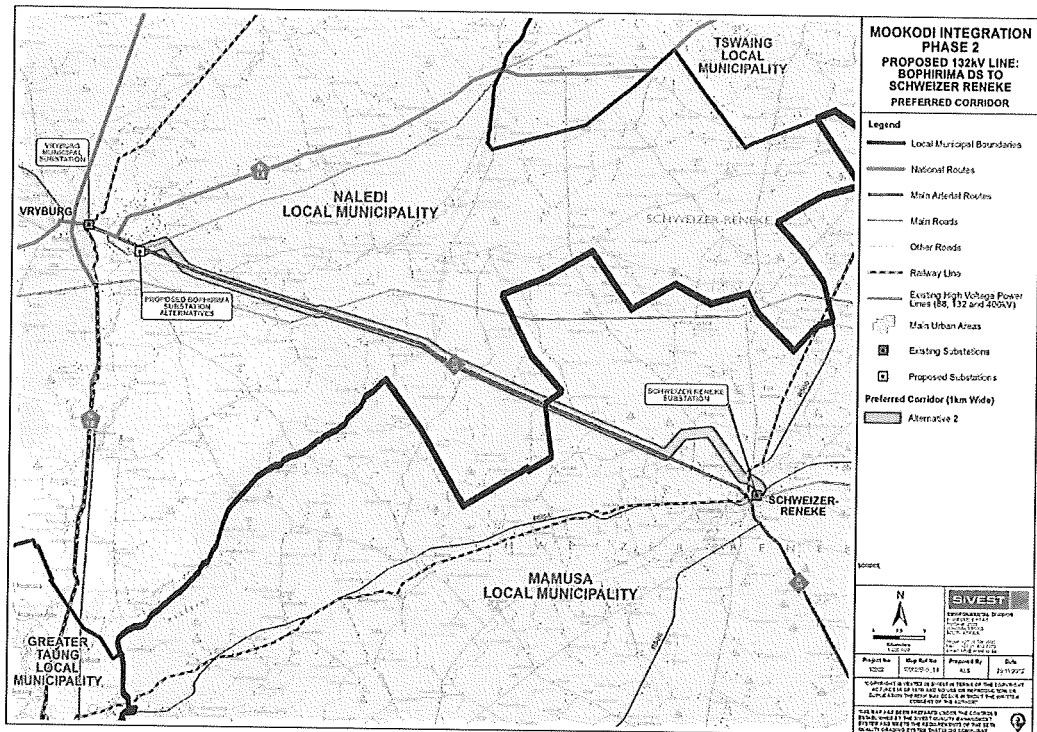


Figure 3: Locality Map – Preferred 132kV power line from Bophirima Substation to Schweizer-Reneke Substation

It should be noted that a 1km wide corridor was proposed for each route alternative to allow flexibility when determining the final route alignment, however only a 31m wide servitude would be required for each proposed 132kV power line. As such, the 31m wide servitude would be positioned within the 1km wide corridor.

## 1.2 Brief Description of the Receiving Environment

The topography in the wider study area around the site is characterised by flat to gently undulating terrain with gradual slopes.

The development falls within the savannah biome, and as such is characterised by a mix of grassy and wooded vegetation, with varying densities of tree / shrub and open grass cover. The proposed lines traverse two main vegetation types. The southern and central parts of the study area, around Vryburg, fall within the Ghaap Plateau Vaalbosveld, which is characterised by a well-developed shrub layer and an open tree layer. Apart from the urban area of Vryburg and

several semi-formal and informal settlements further south near the Dry Harts river valley, natural low shrubveld with limited transformation prevails in this part of the study area. The far eastern parts of the study area falls within the Schweizer-Reneke Bushveld which is characterised by open woodland with a dense underlying shrub layer (Mucina and Rutherford, 2006). Although the vegetation has been partially transformed by cultivated fields and grazing practices, the natural vegetation in this part of the study area remains mostly intact.

The dominant land use in the study area is characterised by natural unimproved vegetation, which is used as grazing land for game, cattle, sheep and goats. Cultivated lands are more prevalent in the far eastern reaches of the study area. In the southern part of the study area where the Mookodi-Magopela power line traverses, natural vegetation dominates with intensive cultivation limited to a small area to the west of the N18 near Pudimoe. The Leon Taljaard Nature Reserve is located directly west of Vryburg, in this area the natural bushveld vegetation remains intact.

Built-up residential areas have also partially transformed the natural vegetation. The dominant built-up areas in the study area include the centrally located town of Vryburg and Schweizer-Reneke to the eastern reaches of the study area. The small town of Taung is located outside the study area approximately 8km south of Magopela Substation. In addition a number of formal, semi-formal, informal communities and 'breaking new ground' (BNG) housing developments are scattered throughout the study area. These include Huhudi just south of Vryburg, Ipelegeng to the south-west of Schweizer-Reneke as well as Moretele, Dry Harts, Choseng, Pudimoe, Mogopela and Mokgareng in the southern reaches of the area traversed by the proposed Mookodi-Magopela power line.

The route corridor alternatives cross various biophysical and social features which may or may not be affected by the proposed power line. Detailed mitigation measures have been developed for the routes based on the specialist studies that were conducted for the project. The following studies were conducted for the proposed project:

- Biodiversity (fauna and flora)
- Avifauna
- Surface water
- Agricultural potential and soil
- Heritage
- Visual
- Social
- Geotechnical

A summary of the major findings are indicated in the table below:

Table 1: Summary of findings

Environmental Parameter	Summary of major findings
<b>Biodiversity</b>	<ul style="list-style-type: none"> <li>▪ Much of the survey area is utilised for low-density livestock grazing and therefore has retained natural features and overall ecological integrity.</li> <li>▪ All the proposed power line alignments incorporate habitat units that would support a variety of faunal and floral species biodiversity to a greater or lesser extent.</li> <li>▪ Protected floral species were observed along all the proposed power line routes to a greater or lesser extent.</li> <li>▪ Impacts on biodiversity and habitat conservation can be successfully mitigated.</li> <li>▪ Impacts on protected areas within the survey area should be avoided as far as possible.</li> <li>▪ For avifaunal impacts, mitigation measures should include the marking of all sections of the lines that pass through migratory routes.</li> </ul>
<b>Surface Water</b>	<ul style="list-style-type: none"> <li>▪ The primary construction related impacts relate to the placing of towers in the wetlands</li> <li>▪ The main operation related impact concerns vehicle damage to wetlands during maintenance.</li> </ul>
<b>Agricultural potential and soils</b>	<ul style="list-style-type: none"> <li>▪ Agricultural activities occur throughout the assessed corridor alternatives.</li> <li>▪ Activities include grazing (for cattle, sheep and goats), irrigated and non-irrigated crop production as well as feedlots.</li> </ul>
<b>Heritage</b>	<ul style="list-style-type: none"> <li>▪ Sites, features and objects of cultural significance are known to exist within the study area:</li> <li>▪ A number of structures/buildings occur in the main towns.</li> <li>▪ A number of formal and informal cemeteries occur in the built regions.</li> <li>▪ Some old farmsteads occur in the vicinity of the various power line alignments.</li> </ul>
<b>Visual</b>	<ul style="list-style-type: none"> <li>▪ The study area is not typically valued or utilised for its natural scenic value and therefore a low density of visually sensitive receptors were identified during the fieldwork.</li> <li>▪ Most of the study area has a low to moderate visual sensitivity due to the presence of existing power lines and limited number of visual receptors present within the study area.</li> </ul>

Environmental Parameter	Summary of major findings
	<ul style="list-style-type: none"> <li>▪ The visual impacts resulting from the proposed power line would be low as long as the recommended mitigation measures are implemented.</li> </ul>
<b>Social</b>	<ul style="list-style-type: none"> <li>▪ Loss of land may result due to Eskom acquiring the servitude right from the legal owners.</li> <li>▪ In areas of existing habitation, it may not be possible to prevent residential dwellings from being established within the power line servitude.</li> <li>▪ Non-local construction workers and opportunity seekers may move into the area. This may extend and disrupt informal settlements, create conflict situations, increase crime and the local risk of HIV/AIDS infection.</li> <li>▪ The development may provide jobs for unskilled and semi-skilled labour.</li> <li>▪ The development will increase the opportunities for informal trading during the construction phase.</li> <li>▪ The increased accessibility would improve living conditions and investor confidence.</li> </ul>
<b>Geotechnical</b>	<ul style="list-style-type: none"> <li>▪ From a geotechnical perspective no fatal flaws have been identified that would prevent the construction of a power line along any of the proposed power lines routes.</li> </ul>
<b>Geohydrology</b>	<ul style="list-style-type: none"> <li>▪ Geological structures within the project area includes faults, inferred faults, lineaments and dykes, which are areas heightened groundwater potential.</li> <li>▪ Numerous boreholes were identified within the study area.</li> <li>▪ Probability of impact of the proposed power line on the geohydrological environment is generally low and can be suitably managed.</li> <li>▪ The impacts are considered to be site specific and would predominantly occur during the construction phase.</li> </ul>

This EMPr has been compiled to ensure good environmental compliance during the construction of the power line and associated infrastructure. The EMPr will be strictly implemented during the construction phase of the project and will be consulted regularly during the lifespan of the project until decommissioning.

### 1.3 Project Responsibilities

Several professionals will form part of the construction team. The most important from an environmental perspective are the Project Manager, the Environmental Control Officer (ECO) and the contractor.

The Project Manager is responsible for the implementation of the EMPr on the site during the pre-construction and construction phases of the project.

The ECO is responsible for monitoring the implementation of the EMPr during the design, pre-construction and construction phases of the project.

The contractor is responsible for abiding by the mitigation measures of the EMPr which are implemented by the Project Manager during the construction phase.

The contractor is responsible for the implementation of the EMPr during the operational and decommissioning phases of the project. It is unlikely that the proposed substation and power line will be decommissioned.

#### 1.3.1 Project Manager

The Project Manager is responsible for overall management of project and EMPr implementation. The following tasks will fall within his / her responsibilities:

- Be aware of the findings and conclusions of the Basic Assessment and the conditions stated within the environmental authorisation (EA).
- Be familiar with the recommendations and mitigation measures of this EMPr, and implement these measures.
- Monitor site activities on a daily basis for compliance.
- Conduct internal audits of the construction site against the EMPr.
- Confine the construction site to the demarcated area.
- Rectify transgressions through the implementation of corrective action.

#### 1.3.2 Environmental Control Officer

The Environmental Control Officer is responsible for the implementation of the EMPr during the construction phase and liaison between the Contractor and the Landowners. The ECO will liaise



and report to the Contractor, landowners and authorities. The following tasks will fall within his / her responsibilities:

- Be aware of the findings and conclusions of the Basic Assessment and the conditions stated within the environmental authorisation.
- Be familiar with the recommendations and mitigation measures of this EMPr.
- Conduct monthly audits of the construction site according to the EMPr and EA.
- Educate the construction team about the management measures of the EMPr and EA.
- Regular liaison with the construction team and the project leader.
- Recommend corrective action for any environmental non-compliance incidents on the construction site.
- Compile a regular report highlighting any non-compliance issues as well as good compliance with the EMPr.
- All negotiations for any reason shall be between the ECO, the affected parties, and the Contractor. No verbal agreements shall be made. All agreements shall be recorded in writing and all parties shall co-sign the documentation.
- The affected parties shall always be kept informed about any changes to the construction programme should they be involved. If the ECO is not on site the Contractor should keep the affected parties informed. The contact numbers of the Contractor and the ECO shall be made available to the affected parties. This will ensure open channels of communication and prompt response to queries and claims.

### 1.3.3 Contractor

The contractor is responsible for the implementation and compliance with recommendations and conditions of the EMPr.

- Ensure compliance with the EMPr at all times during construction
- Maintain an environmental register which keeps a record of all incidents which occur on the site during construction. These incidents include:
  - Public involvement / complaints
  - Health and safety incidents
  - Hazardous materials stored on site
  - Non compliance incidents

The Contractor shall under no circumstances interfere with the property of landowners or nearby communities.

### 1.3.4 Proponent

Although SolarReserve South Africa is the Proponent, Eskom will be responsible for constructing the power line and substation and therefore they will assume ultimate responsibility for the project and all activities related to the construction process i.e. non-compliance, penalties etc.

### 1.3.5 The Environmental Liaison Officer (ELO)

The ELO will be appointed by the Contractor to implement the EMPr and monitor activities on site on a daily basis. The ELO will be the ECO's representative on the site and will report back on all audit trips. The ELO must report any major incidents immediately to the ECO.

Table 2: Responsibilities

Function	Responsibility
Project Manager (PM) Eskom	<ul style="list-style-type: none"> <li>▪ Overall management of project and EMPr implementation</li> </ul>
Senior Site Supervisor/ Contract Manager (CM) Eskom	<ul style="list-style-type: none"> <li>▪ Oversee site works, liaison with Contractor (ELO), PM and ECO</li> </ul>
Environmental Control Officer (ECO) (independent) – Appointed by Eskom	<ul style="list-style-type: none"> <li>▪ Implementation of EMPr, and monitoring of compliance with the requirements of the CEMP.</li> <li>▪ Liaison between Eskom, Contractor and Landowners, including negotiation of access plan.</li> <li>▪ Maintains close communication with the ELO, and oversees the ELO's environmental control, remediation and rehabilitation actions (including checking that the complaints register and register of environmental incidents are being maintained by the ELO).</li> <li>▪ Environmental awareness training of the contractor and select main construction staff</li> <li>▪ Settlement of damage claims and completion of Damage Release Forms</li> <li>▪ Negotiating and acquiring release forms from affected landowners at the end of the construction period.</li> </ul>
Contractor (MC)	<ul style="list-style-type: none"> <li>▪ Ensures the implementation and compliance with recommendations and conditions of the EMPr as well as the EA; Appoints dedicated person (ELO) to work with ECO</li> </ul>

Function	Responsibility
Contractor-appointed Environmental Liaison Officer (ELO)	<ul style="list-style-type: none"> <li>▪ Monitoring of compliance with EMPr, environmental control of site actions, adjusting of environmental quality of works performed by construction staff, remediation and rehabilitation work.</li> <li>▪ Reports back to the ECO through compilation of regular site inspection reports.</li> <li>▪ Ensures compliance of construction activities with relevant environmental legislation.</li> <li>▪ Maintains the complaints register that is kept on-site.</li> <li>▪ Keeps record of all environmental incidents and ensures that corrective action is taken.</li> <li>▪ Compiles method statements from the project-specific EMPr.</li> <li>▪ Environmental awareness training of all staff.</li> <li>▪ Day-to-day management of landowner requirements and landowner liaison; ensures all landowner special conditions are met.</li> </ul>
Environmental Advisor (Eskom)	<ul style="list-style-type: none"> <li>▪ Environmental advice and internal auditing</li> </ul>

- The ELO will be the responsible party for all compliance of this EMPr during the construction phase.
- The monitoring party will be the ECO.
- Method of record keeping will be monthly audits.
- Audit Technique will be the review of records that will be kept on site by the ELO and/ or site inspections.
- Eskom will bear ultimate responsibility.

Table 3: Environmental Management Responsibilities

ITEM	PROJECT COMPONENT AND ACTIVITY	RESPONSIBLE PARTY	MONITORING PARTY	AUDIT TECHNIQUE
1.1	<b>PRE-CONSTRUCTION (SITE ESTABLISHMENT)</b>			
1.1.1	Site preparation	MC, ELO	ECO	SITE VISIT
1.1.2	Consultation	MC, ELO	ELO,ECO	SITE VISIT
1.2	<b>CONSTRUCTION ACTIVITIES</b>			
1.2.1	Site Clearing	MC	ELO,ECO	SITE VISIT
1.2.2	Construction traffic and access	MC, ELO	ECO	SITE VISIT
1.2.3	Construction Camp	MC, ELO	ECO	SITE VISIT
1.2.4	Environmental Education and Training	MC, ELO,ECO	ECO	SITE VISIT
1.2.5	Soils and Geology	MC, ELO	ECO	SITE VISIT
1.2.6	Erosion Control	ELO	ECO	SITE VISIT
1.2.7	Water Use and Quality	ELO	ECO	SITE VISIT
1.2.8	Surface Water and Groundwater	ELO	ECO	RECORDS REVIEW
1.2.9	Waste Management	ELO	ECO	SITE VISIT
1.2.10	Flora	ELO	ECO, Ecologist (When necessary)	SITE VISIT
1.2.11	Fauna	ELO	ECO, Ecologist (When necessary)	RECORDS REVIEW, SITE VISIT
3.1.12	Air Pollution	ELO	ECO	RECORDS REVIEW, SITE VISIT

ITEM	PROJECT COMPONENT AND ACTIVITY	RESPONSIBLE PARTY	MONITORING PARTY	AUDIT TECHNIQUE
3.1.13	Noise and Vibrations	ELO	ECO	RECORDS REVIEW, SITE VISIT
3.1.14	Energy use	ELO	ECO	RECORDS REVIEW, SITE VISIT
3.1.15	Agricultural Potential	ELO	ECO	RECORDS REVIEW, SITE VISIT
3.1.16	Employment	ESKOM, MC	ECO	RECORDS REVIEW, SITE VISIT
3.1.17	Occupational Health and Safety	MC, ELO	ECO, Safety Officer	SITE VISIT
3.1.18	Security	MC, ELO	ECO	SITE VISIT
3.1.19	Socio-economic Environment	MC, ELO	ECO	RECORDS REVIEW, SITE VISIT
3.1.20	Community Engagement	ELO	ECO	SITE VISIT
3.1.21	Visual Impact	ELO	ECO	SITE VISIT
<b>4.1</b>	<b>OPERATION ACTIVITIES</b>			
4.1.1	Construction Site Decommissioning	ESKOM		RECORDS REVIEW
4.1.2	Operation and Maintenance			RECORDS REVIEW
4.1.3	Surface and Groundwater	ESKOM		RECORDS REVIEW
4.1.4	Air Quality	ESKOM		RECORDS REVIEW
4.1.5	Noise	ESKOM		
4.1.6	Pollution Control	ESKOM		
4.1.7	Biodiversity	ESKOM, ELO		

ITEM	PROJECT COMPONENT AND ACTIVITY	RESPONSIBLE PARTY	MONITORING PARTY	AUDIT TECHNIQUE
4.1.8	Waste Management	ELO		
4.1.9	Health and Safety	ELO, SO		
4.1.10	Visual Impact	ELO		
5.1	<b>DECOMMISSIONING ACTIVITIES</b>			
5.1.1	Ongoing Stakeholder involvement	ELO		SITE VISIT
5.1.2	Community health and safety	ELO		
5.1.3	Waste management	ELO		
5.1.4	Surface and groundwater	ELO		
5.1.5	Biodiversity	ELO		

#### 1.3.6 Environmental Audits

Table 4 below provides an outline of the generic process involved in the auditing process. It briefly describes the activities of the process initially beginning with defining the objectives and scope of the auditing process as well as the responsibilities of the various parties. The procedure for the auditing process is explained through to the production of audit findings and the compliance (or non-compliance) of the audit findings.

The Independent auditor will undertake the following:

- Conduct audits
- Submit audit reports to ECO and relevant authority
- Engage specialist sub consultants when required.

Table 4: Example of Procedure for Conducting Audits

Objective	To ensure that formal audits of the EMPr are scheduled and performed so as to verify compliance with the requirements of the EMPr.
Scope	This procedure describes the sequence of events required to perform a compliance audit and the verification of implemented corrective

	action
Responsibilities	<p>The ECO or a person authorised and appointed by him, is responsible for the maintenance of the Environmental Audit System</p> <p>The ECO is responsible for the scheduling and execution of the audit, as well as the verification of the implementation of corrective action. At his/her discretion, this authority may be delegated to responsible company personnel or to an independent Environmental Auditing Authority to perform the audit on his/her behalf.</p> <p>Auditors shall have no direct responsibility in the area/system being audited. They will be trained in techniques for auditing environmental systems.</p> <p>The head of department (HOD)/supervisor for an area/system to be audited (or a responsible person nominated by him/her) will assist the audit team in the execution of the audit. The HOD will also be responsible for timely corrective actions based on the findings of the audit.</p>
Procedure	
Planning the audit	<p>The ECO or his authorised delegate, shall plan the audit of a particular environmental area or system as follows:</p> <ul style="list-style-type: none"> <li>▪ He shall inform, in writing, the division to be audited of the intention to conduct an audit at least two weeks prior to the audit. This notification should include the audit objective, scope and duration and any assistance required from the division.</li> <li>▪ On completion of the audit, an audit findings sheet shall be prepared and</li> </ul>

	<p>submitted to company senior management as well as to the Department/section, which was audited.</p> <ul style="list-style-type: none"> <li>▪ Corrective actions shall be implemented, within eight weeks after the audit, where possible.</li> </ul>
Audit Check List	<p>Auditing will be performed by collecting evidence for verification through interviews, relevant documentation and observation of activities and conditions. Instances of non-conformity to EMPr criteria should be recorded. An environmental audit checklist can be used as a guide to address all relevant issues.</p>
Audit Compliance	See below.
Audit Findings and Reporting of non-compliances	<p>The audit team shall review all evidence of their audit findings to decide on non-compliance. Audit findings of non-compliance must be documented and supported by evidence in the Audit Findings Report.</p> <p>The non-compliance findings will be communicated to the Project Manager and his representatives during an audit feedback meeting.</p> <p>The person responsible for corrective action, will sign the audit findings report sheet to indicate acceptance and commitment to the required corrective action.</p> <p>Findings identified during auditing not covered in the EMPr should be included and the EMPr updated as and when identified.</p>



## 1.4 Layout of Environmental Management Programme

### 1.4.1 Introduction

This EMPr addresses both generic issues as well as specific issues. The generic and specific issues in the EMPrs are separated into different phases. Each phase has specific issues unique to that period of the development and operation of the power lines, substations and associated infrastructure. The impact is identified and given a brief description. The phases of the development are then identified as below:

- Pre-construction (Site Establishment)
- Construction (including associated rehabilitation of affected environment)
- Operation Phase
- Decommissioning of substations

This EMPr seeks to manage and keep to a minimum the negative impacts of a development and at the same time, enhance the positive and beneficial impacts.

The EMPr specifies mitigation measures for the following environmental aspects:

### 1.4.2 Pre-construction (Site establishment)

- Site preparation
- Consultation
- Site clearing

### 1.4.3 Construction

- Construction Camp
- Construction Traffic and Access
- Environmental Education and Training
- Soils and Geology
- Erosion Control
- Water Use and Quality
- Surface and Groundwater
- Waste Management
- Flora

- Fauna
- Air Pollution
- Noise and Vibrations
- Energy use
- Climate Change
- Agricultural Potential
- Employment
- Occupational Health and Safety
- Security
- Social Environment
- Community Engagement
- Visual Impact
- Cultural and Heritage Artefacts

#### *1.4.4 Operation*

- Construction Site Decommissioning
- Operation and Maintenance
- Surface and Groundwater
- Air Quality
- Noise
- Biodiversity
- Waste Management
- Health and Safety
- Visual Impact

#### *1.4.5 Decommissioning Phase*

- Ongoing Stakeholder involvement
- Community health and safety
- Waste Management
- Surface and Groundwater
- Biodiversity
- Air pollution

## 1.5 Objectives of an EMPr

The objectives of this EMPr are to:

- Identify a range of mitigation measures which could reduce and mitigate the potential impacts to minimal or insignificant levels.
- To identify measures that could optimize beneficial impacts.
- To create management structures that address the concerns and complaints of I&APs with regards to the development.
- To establish a method of monitoring and auditing environmental management practices during all phases of development.
- Ensure that the construction and operational phases of the project continues within the principles of Integrated Environmental Management and Environmental Management System (EMS) ISO 14001 Principles.
- Detail specific actions deemed necessary to assist in mitigating the environmental impact of the project.
- Ensure that the safety recommendations are complied with.
- Propose mechanisms for monitoring compliance with the EMPr and reporting thereon.
- Specify time periods within which the measures contemplated in the environmental management programme must be implemented, where appropriate.

The EMPr Seeks to highlight the following:

- Avoiding impacts by not performing certain actions.
- Minimising impacts by limiting aspects of an action.
- Rectifying impacts through rehabilitation, restoration, etc of the affected environment.
- Compensating for impacts by providing substitute resources or environments.
- Minimising impacts by optimising processes, structural elements and other design features.
- Provide ongoing monitoring and management of environmental impacts of a development and documenting of any digressions /good performances.

The EMPr is a legally binding document that all parties involved in the project must be made aware of.

### 1.5.1 Environmental Monitoring

A monitoring programme will be implemented for the duration of the construction phase of the project. This programme will include:

- Monthly audits will be conducted by the Environmental Control Officer, which are according to the EMPr and EA's conditions. These audits can be conducted randomly and do not require prior arrangement with the project manager.
- Compilation of an audit report with a rating of the compliance with the EMPr. This report will be submitted to the relevant authorities.

The ECO shall keep a photographic record of any damage to areas outside the demarcated site area. The date, time of damage, type of damage and reason for the damage shall be recorded in full to ensure the responsible party is held liable. All claims for compensation emanating from damage should be directed to the ECO for appraisal. A register shall be kept of all complaints from the landowner or community (Annexure A). All complaints / claims shall be handled immediately to ensure timeous rectification / payment by the responsible party.

A copy of the EMPr must be kept on site during the construction phase. The EMPr will be made binding on all contractors operating on the site and must be included within the Contractual Clauses. Those responsible for environmental damage must pay the repair costs both to the environment and human health and the preventative measures to reduce or prevent further pollution and/or environmental damage (the polluter pays principle).

## 1.6 Compliance with the EMPr

The Contractor is deemed not to have complied with the EMPr if:

- Within the boundaries of the site, site extensions and access roads there is evidence of contravention of clauses;
- If environmental damage ensues due to negligence;
- The contractor fails to comply with corrective or other instructions issued by the ECO or Authorities within a specified time; or
- The Contractor fails to respond adequately to complaints from the public.

Eskom is deemed not to have complied with the EMPr if:

- Within the boundaries of the site there is evidence of contravention of clauses;
- If environmental damage ensues due to negligence; or
- They fail to respond adequately to complaints from the public.

### 1.6.1 Method Statements

It is standard practice that method statements for various construction-related activities be produced by the contractor's Environmental Liaison Officer (ELO). These method statements will outline in detail how various activities should be undertaken so as not to cause any environmental damage / impacts. It is very important that these method statements be signed off by the ECO. Any changes to the method statements that are made during the construction period must be approved by the ECO. Method statements must be kept on site as part of the official environmental documentation.

### 1.6.2 Non-compliance

Non-conformance will be issues to the Contractor for incidents of non-compliance. The Contractor (through the Environmental Officer) shall also take the necessary steps (e.g. training) to prevent a recurrence of the infringement. The Contractor is also advised that the imposition of non-conformance does not replace any legal proceedings the authorities, landowners and/or members of the public may institute against the Contractor. The Contractor shall be required to make good any damage caused as a result of the infringement at his own expense. A preliminary list of infringements for which non-conformance will be imposed is as follows:

- Using areas outside the working areas without permission/accessing "no-go areas";
- Clearing and/or leveling area outside of the working areas;
- Littering of the site and surrounds;
- Burying/burning waste on site and surrounds;
- The undertaking of informal ablutions
- Making fires on site;
- Spillage onto the ground or water bodies of oil, diesel, or any other potential pollutants;
- Picking/damaging plant material, especially that from the residual areas of natural bush on the site;
- Damaging/killing wild or domestic animals/birds;
- Discharging effluent and/or stormwater onto the ground or into surface water;
- Repeated contravention of the specification or failure to comply with instruction

The Senior Site Supervisor, on recommendation from the ECO, may also order the Contractor to suspend part or all the works if the Contractor repeatedly causes damage to the environment by not adhering to the EMPr (i.e. more than 3 cases of infringements). The suspension will be enforced until such time as the offending actions, procedure or equipment is corrected. No extension of time will be granted for such delays and all costs will be borne by the Contractor.

### 1.6.3 Training and Awareness

- Training of construction workers

The Construction Workers must receive basic training in environmental awareness, including the storage and handling of hazardous substances, minimisation of disturbance to sensitive areas, management of waste, and prevention of water pollution. They must be informed of how to recognise historical / archaeological artefacts that may be uncovered. They must also be appraised of the EMPr's requirements.

- Contractor performance

The Contractor must ensure that the conditions of the EMPr are adhered to. Should the Contractor require clarity on any aspect of the EMPr the Contractor must contact the Environmental Control Officer for advice.

## 1.7 Applicable Legislation, Development Strategies and Guidelines

The following legislation applies:

- Atmospheric Pollution Prevention Act (Act No. 45 of 1965)
- Conservation of Agricultural Resources Act (Act No 43 of 1983)
- Constitution of South Africa (Act No. 108 of 1996)
- Environment Conservation Act (Act No 73 of 1989)
- Hazardous Substances Act (Act No. 15 of 1973)
- National Environmental Management Act (Act No 107 of 1998) – NEMA
- National Environmental Management: Air Quality Act (Act No. 39 of 2004)
- National Environmental Management: Biodiversity Act (Act No. 10 of 2004)
- National Forests Act (Act No 84 of 1998)
- National Heritage Resources Act (Act No 25 of 1999)
- National Veld and Forest Fire Act (Act No 101 of 1998)
- National Water Act (Act No 36 of 1998)
- Northern Cape Nature Conservation Act (Act No 9 of 2009)
- Occupational Health and Safety Act (Act No 85 of 1993)
- Protected species – provincial ordinances

## 2 MITIGATION GUIDELINES

### 2.1 Introduction

Mitigation guidelines are addressed through four phases namely Pre-construction (Site Establishment) Phase; Construction Phase (and associated rehabilitation of affected environment); Operational Phase (Post-Construction) as well as Decommissioning Phase. Each phase has specific issues unique to that period of the development and operation of the proposed infrastructure. The impact is identified and given a brief description. The four phases of the development are then identified as below:

- Pre-construction
- Construction
- Post Construction
- Decommissioning

## 2.2 Pre Construction Phase

### 2.2.1 Site Preparation

Table 5: Site preparation

IMPACT	SITE PREPARATION This section deals with the preparation of the site and actions that need to be implemented before construction commences	RESPONSIBILITY
PHASE	SITE ESTABLISHMENT	MC, ELO, ECO
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
<b>MITIGATION / METHOD STATEMENT</b>	<p><b>Specialist Investigations</b></p> <ol style="list-style-type: none"> <li>1. A detailed walk down by the faunal and floral specialist should be undertaken prior to the onset of the construction phase to survey the area in detail for any RDL species and to develop a comprehensive and site-specific EMPr (Environmental Management Programme to limit the impacts imposed by the proposed development activities at each tower site.</li> <li>2. Prior to the onset of the construction phase, a thorough search through the approved alignment route and servitude roads (walk-through survey) should be undertaken during the flowering season of known RDL floral species in order to remove and rescue potentially affected species.</li> <li>3. A walk down by the avifaunal specialist should be undertaken to identify the spans that will require mitigation devices to be installed, once the exact routing is chosen and the tower positions are pegged.</li> <li>4. A walk down should be undertaken by the heritage specialist prior to finalising the tower positions and commencing with construction. This will be done in order to mitigate and manage the impact of the proposed project on any heritage resources.</li> <li>5. Further detailed geotechnical investigations should be undertaken for the approved alternatives.</li> </ol>	

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IMPACT	SITE PREPARATION This section deals with the preparation of the site and actions that need to be implemented before construction commences	RESPONSIBILITY
PHASE	SITE ESTABLISHMENT	MC, ELO, ECO
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
	<p>6. A final walk-through surface water study should be undertaken to identify wetlands that are at risk to damage during the construction process and will require site specific mitigation measures. Once a selected power line route has been determined, it will then be necessary to accurately delineate each wetland along the chosen alignment and include the findings in a wetland final walk-down report.</p> <p><b>Appoint construction team and suitable manager</b></p> <p>7. Appoint an Environmental Control Officer and Environmental Liaison Officer. The ELO is appointed on the contractor's behalf while the ECO is appointed on the proponent's behalf.</p> <p>8. The Contractor must draw up method statements for relevant construction activities. The ECO must approve all of the method statements before they become operational.</p> <p><b>Site demarcation and compliance</b></p> <p>9. Before construction begins, the areas to be excavated for the pylons and stay wires should be barricaded with fencing or orange construction barrier.</p> <p>10. All tower positions must be pegged by a qualified surveyor prior to the onset of construction.</p> <p>11. All existing boreholes within the power line alignment have to be identified and surveyed.</p> <p>12. All Construction Camps are to be fenced off in such a manner that unlawful entry is prevented and access is controlled. Signage shall be erected at all access points in compliance with all applicable occupational health and safety requirements. All access points to the Construction Camp should be controlled by a guard or otherwise monitored, to prevent unlawful access.</p> <p>13. The contractor and ECO must ensure compliance with conditions described in the EA.</p> <p>14. All no-go areas on the servitude must be properly fenced off and signage placed prior to the onset of</p>	

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IMPACT	SITE PREPARATION This section deals with the preparation of the site and actions that need to be implemented before construction commences	RESPONSIBILITY
PHASE	SITE ESTABLISHMENT	MC, ELO, ECO
ENVIRONMENTAL MANAGEMENT PROGRAMME	<p>construction. If this is not practical (such as where the area is too large to fence off), the area should be demarcated with barrier tape and signage should be erected.</p> <p>15. Records of compliance / non-compliance with the conditions of the authorisation must be kept and be available on request.</p> <p>16. Records of all environmental incidents must be maintained and a copy of these records be made available to provincial department on request throughout the project execution.</p> <p>17. Identify suitable licensed landfill site, which will accept the type of waste material to be generated.</p> <p>18. Identify suitable site/borrow pit (if applicable) to obtain soil.</p> <p><b>Labour</b></p> <p>19. All unskilled labourers should be drawn from the local market and where possible use should be made of local semiskilled and skilled personnel where possible.</p> <p>20. Labour intensive methods must be used where feasible, cost effective and not time constraining.</p>	

### 2.2.2 Consultation

Table 6: Consultation

IMPACT	CONSULTATION This section deals with the public consultation of the site and actions that need to be implemented before construction commences	RESPONSIBILITY

PHASE	PRE-CONSTRUCTION	ELO
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
<b>MITIGATION / METHOD STATEMENT</b>	<p><b>Consultation</b></p> <ol style="list-style-type: none"> <li>Engage in thorough, open, and constructive consultation with any and all land owners.</li> <li>The Landowners shall be informed of the starting date of construction as well as the phases in which the construction shall take place.</li> <li>Provide a mechanism through which information could be exchanged between the project proponent and stakeholders.</li> <li>Surrounding communities must be kept informed, through the identified and agreed consultation channels, of the commencement of construction.</li> <li>Solicit views and concerns from the public and allow them to suggest mitigations and enhancement measures.</li> </ol>	

### 2.2.3 Site Clearing

Table 7: Site Clearing

IMPACT	SITE CLEARING	RESPONSIBILITY
	This section deals with site clearing and actions that need to be implemented before construction commences	
<b>PHASE</b>	<b>PRE-CONSTRUCTION</b>	<b>MC</b>
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
<b>MITIGATION/ METHOD STATEMENT</b>	<p><b>Site clearing</b></p> <ol style="list-style-type: none"> <li>Site clearing must take place in a phased manner, as and when required.</li> <li>Areas which are not to be constructed on within two months must not be cleared to reduce erosion risks.</li> <li>The area to be cleared must be clearly demarcated and this footprint strictly maintained.</li> </ol>	

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	<p>4. Spoil that is removed from the site must be removed to an approved spoil site or a licensed landfill site.</p> <p>5. The necessary silt fences and erosion control measures must be implemented in areas where these risks are more prevalent.</p> <p>6. Conduct construction walk down prior to construction to conduct a search and rescue exercise.</p> <p>7. Demarcation of sensitive areas prior to construction activities starting.</p> <p>8. In terms of surface water, potential negative impacts are related primarily to vegetation clearing activities in the riparian habitat, wetlands and drainage lines. Mitigation measures should be strictly implemented.</p>	
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## 2.3 Construction Phase

### 2.3.1 Construction Camp

Table 8: Construction Camp

IMPACT	CONSTRUCTION CAMP This section deals with construction camp and actions that need to be implemented during construction	RESPONSIBILITY
PHASE	CONSTRUCTION	MC / ELO / ECO
ENVIRONMENTAL MANAGEMENT PROGRAMME		
MITIGATION / METHOD STATEMENT	Site of construction camp 1. Choice of site for the Contractor's camp requires the Project Manager and ECO's permission and must take into account location of local residents and / or ecologically sensitive areas, including flood zones. A site plan must be submitted to the Project Manager for approval.	

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IMPACT	CONSTRUCTION CAMP This section deals with construction camp and actions that need to be implemented during construction	RESPONSIBILITY
PHASE	CONSTRUCTION	MC / ELO / ECO
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
	<p>2. The size of the construction camp should be minimized (especially where natural vegetation or grassland has had to be cleared for its construction).</p> <p>3. Adequate parking must be provided for site staff and visitors. The Contractor must attend to drainage of the camp site to avoid standing water and / or sheet erosion.</p> <p>4. Suitable control measures over the Contractor's yard, plant and material storage to mitigate any visual impact of the construction activity must be implemented.</p>	
	<p><b>Construction Camp</b></p> <p>5. The ECO and Contractor must inspect the Construction Camp site to confirm and note any environmental sensitivity.</p> <p>6. The construction camp layout plan must be provided to the ECO for approval prior to the construction of the camp.</p> <p>7. The construction camp must be fenced off and on-site security should be put in place prior to commencing with the construction activities.</p> <p>8. The Contractor shall supply a wastewater management system that will comply with legal requirements and be acceptable to Eskom if this does not already exist on the site.</p> <p>9. Site establishment shall take place in an orderly manner and all required amenities shall be installed at camp sites before the main workforce move onto site.</p> <p>10. All construction equipment must be stored within this construction camp or the farm under lease.</p> <p>11. No oil changes and servicing should take place on the construction site. All associated oil changes must take place on a sealed surface such as a concrete slab or a similar appropriate surface.</p>	

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IMPACT	CONSTRUCTION CAMP This section deals with construction camp and actions that need to be implemented during construction	RESPONSIBILITY
PHASE	CONSTRUCTION	MC / ELO / ECO
	<p><b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b></p> <p>12. All Construction Camps shall be provided with portable fire extinguishing equipment, in accordance with all relevant legislation and must be readily accessible.</p> <p>13. The Contractor must provide sufficient ablution facilities (1 toilet per every 15 workers), in the form of portable / VIP toilets, at the Construction Camps, and shall conform to all relevant health and safety standards and codes. No pit latrines, French drain systems or soak away systems shall be allowed and toilets may not be situated within 50 meters of any surface water body or 1:100 year flood line. A sufficient number of toilets shall be provided to accommodate the number of personnel working in the area.</p> <p>14. The Contractor shall inform all site staff to make use of supplied ablution facilities and under no circumstances shall indiscriminate sanitary activities be allowed.</p> <p>15. No fires will be allowed and the Contractor must make alternative arrangements for heating. LP Gas may be used, provided that all required safety measures are in place. The Contractor shall take specific measures to prevent the spread of veld fires, caused by activities at the campsites. These measures may include appropriate instruction of employees about fire risks and the construction of firebreaks around the site perimeter.</p> <p>16. Should an area for cooking be required, it must be inspected and approved by the ECO prior to use.</p> <p><b>Storage of materials (including hazardous materials)</b></p> <p>17. An area for the storage of hazardous materials must be established that conforms to the relevant safety requirements and that provides for spillage prevention and containment.</p> <p>18. Choice of location for storage areas must take into account prevailing winds, distances to water</p>	

IMPACT	CONSTRUCTION CAMP This section deals with construction camp and actions that need to be implemented during construction	RESPONSIBILITY
PHASE	CONSTRUCTION	MC / ELO / ECO
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
	<p>bodies, general onsite topography and water erosion potential of the soil. Impervious surfaces must be provided where necessary.</p> <p>19. Storage areas must be designated, demarcated and fenced if necessary.</p> <p>20. Storage areas should be secure so as to minimize the risk of crime. They should also be safe from access by unauthorised persons i.e. children / animals etc.</p> <p>21. Fire prevention facilities must be present at all storage facilities.</p> <p>22. Proper storage facilities for the storage of oils, grease, fuels, chemicals and any hazardous materials to be used must be provided to prevent the migration of spillage into the ground and groundwater regime around the temporary storage area(s). These pollution prevention measures for storage should include a bund wall high enough to contain at least 110% of any stored volume, and this should be sited away from drainage lines in a site with the approval of the ECO. The bund wall must be high enough to contain 110% of the total volume of the stored hazardous material with an additional allocation for potential stormwater events.</p> <p>23. All fuel storage areas must be banded to avoid creation of dirty stormwater</p> <p>24. These storage facilities (including any tanks) must be on an impermeable surface that is protected from the ingress of storm water from surrounding areas in order to ensure that accidental spillage does not pollute local soil or water resources.</p> <p>25. Material Safety Data Sheets (MSDSs) shall be readily available on site for all chemicals and hazardous substances to be used on site. Where possible the available, MSDSs should additionally include information on ecological impacts and measures to minimise negative environmental impacts during accidental releases or escapes.</p>	

IMPACT	CONSTRUCTION CAMP This section deals with construction camp and actions that need to be implemented during construction	RESPONSIBILITY
PHASE	CONSTRUCTION	MC / ELO / ECO
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
	<p>26. Storage areas containing hazardous substances / materials must be clearly signposted.</p> <p>27. An approved waste disposal contractor must be employed to remove and recycle waste oil, if practical. The contractor must ensure that its staff dealing with these materials / substances are made aware of the health risks associated with any hazardous substances used and have been provided with the appropriate protective clothing/equipment in case of spillages or accidents and have received the necessary training.</p> <p>28. All excess cement and concrete mixes are to be contained within a bunded area on the construction site prior to disposal off site.</p> <p>29. All major spills as specified in the contractor emergency response procedure of any materials, chemicals, fuels or other potentially hazardous or pollutant substances must be cleaned immediately and the cause of the spill investigated. Preventative measures must be identified and submitted to the ECO for information. Emergency response procedures to be followed and implemented.</p> <p><b>Drainage of construction camp</b></p> <p>30. Surface drainage measures must be established in the Construction Camps so as to prevent</p> <ul style="list-style-type: none"> <li>▪ Ponding of water;</li> <li>▪ Erosion as a result of accelerated runoff; and,</li> <li>▪ Uncontrolled discharge of polluted runoff.</li> </ul>	

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2.3.2 Construction traffic and access

Table 9: Construction Traffic and Access

IMPACT	CONSTRUCTION TRAFFIC AND ACCESS This section deals with construction traffic and access and actions that need to be implemented during construction	RESPONSIBILITY
PHASE	CONSTRUCTION	MC / ELO
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
MITIGATION / METHOD STATEMENT	<p><b>Construction traffic</b></p> <ol style="list-style-type: none"> <li>All equipment moved onto site or off site during a project is subject to the legal requirements as well as Eskom specifications for the transport of such equipment.</li> <li>The Contractor shall meet these safety requirements under all circumstances. All equipment transported shall be clearly labelled as to their potential hazards according to specifications. All the required safety labelling on the containers and trucks used shall be in place.</li> <li>The Contractor shall ensure that all the necessary precautions against damage to the environment and injury to persons are taken in the event of an accident.</li> <li>Construction routes and required access roads must be clearly defined. Roads not to be used shall be marked with a "NO ENTRY for construction vehicles" sign.</li> <li>No new access roads to be created through wetlands and drainage lines. Existing tracks must be used.</li> <li>Delivery of equipment must be undertaken with the minimum amount of trips to reduce the carbon footprint of these activities.</li> <li>Access of all construction and material delivery vehicles should be strictly controlled, especially during wet weather to avoid compaction and damage to the topsoil structure.</li> <li>Damping down of the un-surfaced roads or use of a biodegradable soil stabilisation agent must be implemented to reduce dust and nuisance.</li> <li>Vehicles and equipment shall be serviced regularly to avoid the contamination of soil from oil and</li> </ol>	

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IMPACT	CONSTRUCTION TRAFFIC AND ACCESS This section deals with construction traffic and access and actions that need to be implemented during construction	RESPONSIBILITY
PHASE	CONSTRUCTION	MC / ELO
	<p data-bbox="403 1332 432 1709"><b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b></p> <p data-bbox="432 1406 469 1709">hydraulic fluid leaks etc.</p> <ol data-bbox="469 589 655 1709" style="list-style-type: none"> <li>10. Servicing must be done in dedicated service areas on site or else off site if no such area exists.</li> <li>11. Oil changes must take place on a concrete platform and or over a drip tray to avoid pollution.</li> <li>12. Soils compacted by construction shall be deep ripped to loosen compacted layers and re-graded to even running levels.</li> <li>13. Any temporary access roads to be rehabilitated prior to contractors leaving the site.</li> </ol> <p data-bbox="687 1615 715 1709"><b>Access</b></p> <ol data-bbox="715 589 895 1709" style="list-style-type: none"> <li>14. The main routes on the site must be clearly signposted and printed delivery maps must be issued to all suppliers and Sub-Contractors.</li> <li>15. Planning of access routes to the site for construction purposes shall be done in conjunction with the Contractor and the Landowner. All agreements reached should be documented and no verbal agreements should be made.</li> </ol> <p data-bbox="927 1491 959 1709"><b>Road maintenance</b></p> <ol data-bbox="959 589 1177 1709" style="list-style-type: none"> <li>16. The ECO must establish and agree maintenance responsibilities with the landowner.</li> <li>17. Contractors should ensure that access roads are maintained in good condition by rehabilitating damaged areas and attending to potholes, corrugations and storm water damages as soon as these develop.</li> <li>18. If necessary, staff must be employed to clean surfaced roads adjacent to construction sites where materials have spilt.</li> </ol> <p data-bbox="1209 1615 1241 1709"><b>General</b></p>	

IMPACT	CONSTRUCTION TRAFFIC AND ACCESS This section deals with construction traffic and access and actions that need to be implemented during construction	RESPONSIBILITY
PHASE	CONSTRUCTION	MC / ELO
ENVIRONMENTAL MANAGEMENT PROGRAMME	<p>19. The contractor shall meet safety requirements under all circumstances. All equipment transported shall be clearly labelled as to their potential hazards according to specifications. All the required safety labelling on the containers and trucks used shall be in place.</p> <p>20. The Contractor shall ensure that all the necessary precautions against damage to the environment and injury to persons are taken.</p> <p>21. Care for the safety and security of community members crossing access roads should receive priority at all times.</p>	

### 2.3.3 Environmental Education and Training

Table 10: Environmental Education and Training

IMPACT	ENVIRONMENTAL EDUCATION AND TRAINING This section deals with the environmental training of construction employees.	RESPONSIBILITY
PHASE	CONSTRUCTION	MC, ELO
ENVIRONMENTAL MANAGEMENT PROGRAMME	<p>ENVIRONMENTAL training</p> <ol style="list-style-type: none"> <li>The project manager must appoint an ECO prior to construction</li> <li>Ensure that all site personnel have a basic level of environmental awareness training. The Contractor must submit a proposal for this training to the ECO for approval. Topics covered should include:</li> </ol>	

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IMPACT	ENVIRONMENTAL EDUCATION AND TRAINING This section deals with the environmental training of construction employees.	RESPONSIBILITY
PHASE	CONSTRUCTION	MC, ELO
ENVIRONMENTAL MANAGEMENT PROGRAMME		
	<ul style="list-style-type: none"> <li>▪ What is meant by "Environment"</li> <li>▪ Why the environment needs to be protected and conserved</li> <li>▪ How construction activities can impact on the environment</li> <li>▪ What can be done to mitigate against such impacts</li> <li>▪ Awareness of emergency and spills response provisions</li> <li>▪ Social responsibility during construction e.g. being considerate to local residents</li> <li>▪ Specific mitigation measures stipulated in the EMPr and EA.</li> </ul> <p>3. Environmental awareness training for <u>all</u> construction staff must be undertaken by the ECO prior to construction starting. Translators are to be used where necessary. The topics covered should include, but not be limited to the following:</p> <ul style="list-style-type: none"> <li>▪ Use of the appropriate fire-fighting equipment</li> <li>▪ The need for a "clean site" policy</li> <li>▪ The prevention of accidental spillage of hazardous chemicals and oil</li> <li>▪ Pollution of water resources (both surface and groundwater)</li> <li>▪ Air pollution and litter control</li> <li>▪ The need to refrain from indiscriminant waste disposal and/or pollution of local soil and water resources</li> <li>▪ General safety</li> </ul> <p>4. Training of new staff that did not receive the initial training is the responsibility of the ECO.</p> <p>5. All stakeholders and key personnel should undergo an archaeological induction course, as part of their overall training. The course should highlight the appropriate communication channels to managers and</p>	

IMPACT	ENVIRONMENTAL EDUCATION AND TRAINING This section deals with the environmental training of construction employees.	RESPONSIBILITY
PHASE	CONSTRUCTION	MC, ELO
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
	<p>educate workers with regard to recognising artefacts, features and significant sites. Project manager shall ensure that the training and capabilities of the Contractor's site staff are adequate to carry out the designated tasks. Use should be made of environmental awareness posters on site.</p> <p>6. Staff operating equipment (such as cranes, etc.) shall be adequately trained and sensitized to any potential hazards associated with their tasks. No operator shall be permitted to operate critical items of mechanical equipment without having been trained by the Contractor and certified competent by the Project Manager.</p> <p>7. No operator shall be permitted to operate critical items of mechanical equipment without having been trained by the Contractor and certified competent by the Project Manager.</p> <p><b>Monitoring of environmental training</b></p> <p>8. The Contractor must monitor the performance of construction workers to ensure that the points relayed during their introduction have been properly understood and are being followed. If necessary, the ECO and / or a translator should be called to the site to further explain aspects of environmental or social behaviour that are unclear. Toolbox talks are recommended.</p>	

### 2.3.4 Soils and Geology

General guidelines for management of soils are provided in Annexure B

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Table 11: Soils and Geology

IMPACT	SOILS AND GEOLOGY This section deals with soils and geology and actions that need to be implemented during construction	RESPONSIBILITY
PHASE	CONSTRUCTION	MC/ ELO
<p><b>ENVIRONMENTAL / MITIGATION / METHOD STATEMENT</b></p>	<p><b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b></p> <p>General</p> <ol style="list-style-type: none"> <li>1. Minimise disturbance of natural vegetation on the sites.</li> <li>2. Access routes must ideally be planned on areas less susceptible to erosion/ destabilization/ compaction or appropriate action must be taken to minimise impact, e.g. planning of new access routes along contour lines and minimizing of cutting and filling operations.</li> <li>3. Rehabilitate soil and vegetation.</li> <li>4. Implement effective erosion control measures.</li> <li>5. The ECO shall ensure that all agreements reached with the Landowner are fulfilled, and that such areas be rehabilitated once construction is completed. Should any claim be instituted against Eskom, due to the actions of the Contractor at a batching plant site, Eskom shall hold the Contractor fully responsible for the claim until such time that the Contractor can prove otherwise with the necessary documentation.</li> </ol> <p>Use of berms and drainage channels to direct water away from the construction areas where necessary.</p> <p><b>Topsoil</b></p> <ol style="list-style-type: none"> <li>6. The contractor should, prior to the commencement of earthworks determine the average depth of topsoil, and agree on this with the ECO. Due to the length of the line, this will have to be undertaken in a number of locations due to the likely variability of soils along the route.</li> <li>7. The full depth of topsoil should be stripped from areas affected by construction (substation site and tower positions) and related activities prior to the commencement of major earthworks. This should include the building footprints, working areas and storage areas.</li> </ol>	

IMPACT	SOILS AND GEOLOGY This section deals with soils and geology and actions that need to be implemented during construction	RESPONSIBILITY
PHASE	CONSTRUCTION	MC/ELO
ENVIRONMENTAL MANAGEMENT PROGRAMME	<p>8. At any tower sites where conventional foundations are installed, the Contractor shall remove the topsoil separately and store it for later use during rehabilitation of such tower sites. During backfilling operations, the Contractor shall take care not to dump the topsoil in the bottom of the foundation and then put spoil on top of that.</p> <p><b>Soil Stripping</b></p> <p>9. No soil stripping must take place on areas within the site that the contractor does not require for construction works or areas of retained vegetation.</p> <p>10. Subsoil and overburden in all construction and lay down areas should be stockpiled separately to be returned for backfilling in the correct soil horizon order.</p> <p>11. Construction vehicles must only be allowed to utilize existing tracks or pre-planned access routes.</p> <p>12. Preserve topsoil separate from the subsoils.</p> <p><b>Soil Stockpiles</b></p> <p>13. Stockpiles should not be situated such that they obstruct natural water pathways.</p> <p>14. Stockpiles should not exceed 2m in height unless otherwise permitted by the Engineer.</p> <p>15. If stockpiles are exposed to windy conditions or heavy rain, they should be covered either by vegetation or geofabric, depending on the duration of the project. Stockpiles may further be protected by the construction of berms or low brick walls around their bases.</p> <p>16. Where contamination of soil is expected, analysis must be done prior to disposal of soil to determine the appropriate disposal route. Proof from an approved waste disposal site where contaminated soils are dumped if and when a spillage / leakage occur should be attained and given to the project manager.</p>	

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IMPACT	SOILS AND GEOLOGY This section deals with soils and geology and actions that need to be implemented during construction	RESPONSIBILITY
PHASE	CONSTRUCTION	MC/ ELO
ENVIRONMENTAL MANAGEMENT PROGRAMME		
	<p><b>Fuel storage</b></p> <p>17. Topsoil and subsoil to be protected from contamination. This should be monitored on a monthly basis by a visual inspection of diesel/oil spillage and pollution prevention facilities.</p> <p>18. Fuel and material storage must be away from stockpiles.</p> <p>19. Any storage tanks containing hazardous materials must be placed in bunded containment areas with sealed surfaces. These areas should be roofed to avoid contamination of stormwater.</p> <p>20. Use and or storage of materials, fuel and chemicals which could potentially leak into the ground must be controlled.</p> <p>21. The Contractor (monitored by the ECO and ELO) should be responsible for ensuring that potentially harmful materials are properly stored in a dry, secure, ventilated environment, with concrete or sealed flooring and a means of preventing unauthorised entry.</p> <p>22. Contaminated wastewater must be managed by the Contractor to ensure existing water resources on the site are not contaminated. All wastewater from general activities in the camp shall be collected and removed from the site for appropriate disposal at a licensed commercial facility.</p> <p>23. An oil holding dam must be installed or the existing one expanded to accommodate for the potential leakage events.</p> <p><b>Concrete mixing</b></p> <p>24. The concrete batching plant must be contained within a bunded area.</p> <p>25. Concrete mixing must only take place within designated areas and may not take place on the ground.</p> <p>26. Ready mixed concrete must be utilised where possible.</p> <p>27. If a batching plant is necessary, run-off should be managed effectively to avoid contamination of other</p>	

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IMPACT	SOILS AND GEOLOGY	RESPONSIBILITY
	This section deals with soils and geology and actions that need to be implemented during construction	
PHASE	CONSTRUCTION	MC/ ELO
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
	<p>areas of the site. Run-off from the batch plant must not be allowed to enter the storm water system.</p> <p><b>Washing</b></p> <p>28. No vehicles transporting concrete to the site may be washed on site.</p> <p><b>Earthworks</b></p> <p>29. Soils compacted during construction should be deeply ripped to loosen compacted layers and re-graded to even running levels. Topsoil should be re-spread over landscaped areas.</p> <p>30. If earthworks are required then storm water control and wind screening should be undertaken to prevent soil erosion.</p>	

### 2.3.5 Erosion Control

Table 12: Erosion Control

IMPACT	EROSION CONTROL	RESPONSIBILITY
	This section deals with erosion and actions that need to be implemented during construction	
PHASE	CONSTRUCTION	ECO
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
MITIGATION / METHOD	1. The use of silt fences and sand bags must be implemented in areas that are susceptible to erosion, if any.	

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IMPACT	EROSION CONTROL This section deals with erosion and actions that need to be implemented during construction	RESPONSIBILITY
PHASE	CONSTRUCTION	ECO
ENVIRONMENTAL MANAGEMENT PROGRAMME		
STATEMENT	<p>2. Other erosion control measures that can be implemented are as follows:</p> <ul style="list-style-type: none"> <li>▪ Brush packing with cleared vegetation</li> <li>▪ Mulch or chip packing</li> <li>▪ Planting of vegetation</li> <li>▪ Hydroseeding / hand sowing</li> </ul> <p>3. Sensitive areas need to be identified prior to construction so that the necessary precautions can be implemented.</p> <p>4. All erosion control mechanisms need to be regularly maintained.</p> <p>5. Seeding of topsoil and subsoil stockpiles to prevent wind and water erosion of soil surfaces.</p> <p>6. Retention of vegetation where possible to avoid soil erosion</p> <p>7. Re-vegetation of disturbed surfaces should occur immediately after construction activities are completed. This should be done through seeding with indigenous grasses.</p> <p>8. No impediment to the natural water flow other than approved erosion control works is permitted.</p> <p>9. To prevent stormwater damage, the increase in stormwater run-off resulting from construction activities must be estimated and the drainage system assessed accordingly. A drainage plan must be submitted to the Engineer for approval and must include the location and design criteria of any temporary stream crossings.</p> <p>10. Implement site drainage and landscaping, to prevent surface ponding, where subsequent ingress into foundations has the potential to cause destabilisation over time.</p> <p>11. Convey all runoff away from the substation and off the site.</p> <p>12. Stockpiles not used in three (3) months after stripping must be seeded to prevent dust and erosion.</p>	

IMPACT	EROSION CONTROL This section deals with erosion and actions that need to be implemented during construction	RESPONSIBILITY
PHASE	CONSTRUCTION	ECO
ENVIRONMENTAL MANAGEMENT PROGRAMME		
Run-off		
13. Culverts should be constructed under roadways that cross the natural flow of water in order to prevent damming.		
14. Oil traps should be installed to remove the bulk of the oil from the water, which water can then be used on haul roads for dust suppression or as wash down water in the wash bays.		
<b>SITE SPECIFIC MITIGATION MEASURES</b>		
MITIGATION / METHOD STATEMENT	15. If earthworks are required, wind screening and stormwater control should be undertaken to prevent soil loss from the site.	
	16. In the unlikely event that heavy rains are expected activities should be put on hold to reduce the risk of erosion.	
	17. If earthworks are required, any steep or large embankments that are expected to be exposed during the 'rainy' months should be armoured with fascine like structures.	
	18. Use of berms and drainage channels to direct water away from the construction areas where necessary.	

2.3.6 Water Use and Quality

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Table 13: Water Use and Quality

IMPACT	WATER USE AND QUALITY This section deals with water use and quality and actions that need to be implemented during construction		RESPONSIBILITY
PHASE	CONSTRUCTION		ECO
MITIGATION / METHOD STATEMENT	<p><b>Water Use</b></p> <ol style="list-style-type: none"> <li>1. Develop a sustainable water supply management plan to minimize the impact to natural systems by managing water use, avoiding depletion of aquifers and minimizing impacts to water users.</li> <li>2. No water may be abstracted from a natural water body unless authorised under a General Authorisation under the National Water Act, or unless authorised by the Department of Water Affairs through a water use licence if such a licence is required.</li> <li>3. No water may be abstracted from a borehole without the required licence.</li> <li>4. Water must be reused, recycled or treated where possible.</li> <li>5. Water saving measures must be implemented.</li> <li>6. Consultation with key stakeholders to understand any conflicting water use demands and the communities' dependency on water resources and conservation requirements within the area.</li> <li>7. A water use licence is likely to be required with regards to water uses (c) and (i) of the NWA. (Recommended from the specialists report)</li> </ol> <p><b>Water Quality.</b></p> <ol style="list-style-type: none"> <li>8. Discharge to surface water should not result in contaminant concentrations in excess of DWA standards.</li> <li>9. Efficient oil and grease traps or sumps should be installed and maintained at refuelling facilities, workshops, fuel storage depots, and containment areas and spill kits should be available with emergency response plans.</li> </ol> <p><b>Stormwater</b></p> <ol style="list-style-type: none"> <li>10. The site must be managed in order to prevent pollution of drains, downstream watercourses or</li> </ol>		Engineer

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IMPACT	WATER USE AND QUALITY This section deals with water use and quality and actions that need to be implemented during construction	RESPONSIBILITY
PHASE	<p><b>CONSTRUCTION</b></p> <p>groundwater, due to suspended solids and silt or chemical pollutants.</p> <ol style="list-style-type: none"> <li>11. Silt fences should be used to prevent any soil entering the stormwater drains.</li> <li>12. Temporary cut off drains and berms may be required to capture stormwater and promote infiltration.</li> <li>13. Promote a water saving mind set with construction workers in order to ensure less water wastage.</li> <li>14. New stormwater construction must be developed strictly according to specifications from engineers in order to ensure efficiency.</li> <li>15. Hazardous substances must be stored at least 20m from any water bodies on site to avoid pollution.</li> <li>16. The installation of the stormwater system must take place as soon as possible to attenuate stormwater from the construction phase as well as the operation phase.</li> <li>17. Earth, stone and rubble is to be properly disposed of, or utilized on site so as not to obstruct natural water path ways over the site. i.e. these materials must not be placed in stormwater channels, drainage lines or rivers.</li> <li>18. There should be a periodic checking of the site's drainage system to ensure that the water flow is unobstructed.</li> <li>19. If a batching plant is necessary, run-off should be managed effectively to avoid contamination of other areas of the site. Untreated runoff from the batch plant must not be allowed to get into the storm water system or nearby streams, rivers or erosion channels or dongas.</li> </ol>	ECO

### 2.3.7 Surface and Groundwater

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Table 14: Surface and Groundwater

IMPACT	<b>SURFACE WATER AND GROUNDWATER</b> This section deals with surface and groundwater and actions that need to be implemented during construction		RESPONSIBILITY
PHASE	CONSTRUCTION		ECO / Main Contractor
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>			
<b>MITIGATION / METHOD STATEMENT</b>	<ol style="list-style-type: none"> <li>1. Site staff shall not be permitted to use any other open water body or natural water source adjacent to or within the designated site for the purposes of bathing, washing of clothing or for any construction or related activities.</li> <li>2. Municipal water (or another source approved by the ECO) should instead be used for all activities such as washing of equipment or disposal of any type of waste, dust suppression, concrete mixing, compacting, etc.</li> <li>3. Relevant departments and other emergency services should be contacted in order to deal with spillages and contamination of aquatic environments.</li> <li>4. Ensure that stream flow can bypass construction site.</li> <li>5. Ensure that contaminants are safely stored and away from surface water features.</li> <li>6. Storm water management must be enforced by monitoring runoff levels. At the start of erosion, accelerated run-off must be diverted away from bare soil.</li> </ol>		
<b>SITE SPECIFIC MITIGATION MEASURES</b>			
<b>MITIGATION / METHOD STATEMENT</b>	<p><b>Recommendations should infrastructure be placed within the watercourse and associated buffer zone areas:</b></p> <ol style="list-style-type: none"> <li>7. A construction method statement must be supplied to a suitably qualified wetland or aquatic specialist in order for suitable site specific mitigation measures to be devised for the construction phase, in addition to the measures specified here.</li> <li>8. Vehicle access into or through watercourses may only be allowed where absolutely necessary and after the requisite environmental authorisation and water use license has been obtained.</li> </ol>		

IMPACT	SURFACE WATER AND GROUNDWATER This section deals with surface and groundwater and actions that need to be implemented during construction	RESPONSIBILITY
PHASE	CONSTRUCTION	ECO / Main Contractor
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
	<p>9. Vehicles must be restricted to smaller vehicles where possible and not heavy vehicles to limit compaction impacts. The number of trips into or through the watercourses must be limited to the absolute minimum.</p> <p>10. In order to limit the amount of damage caused by vehicles, activity must be limited to a narrow track or "Right of Way" (ROW) only. This track should not be more than 5m wide.</p> <p>11. Heavy machinery and vehicles must be checked for oil leaks before operating in the watercourse or the associated buffer zones. Additionally, no fuelling or re-fuelling is allowed to take place in the watercourses and the associated buffer zone areas.</p> <p>12. The removal of excavated sub-soils or substrate of the watercourses for the foundations of the towers must take place only if completely necessary (i.e. if the excavated soil cannot be re-instated due to it being an unsuitable grade of backfill for the foundation of the structure etc.). Removed excavated soils will need to be dumped at a registered landfill that has sufficient capacity.</p> <p>13. Where excavated soils can be re-instated, the order of soils horizons should be backfilled correctly (i.e. sub-surface soils first, topsoil last).</p> <p>14. All stockpiled soils should preferably be placed outside the identified watercourses. However, where this is not practical, the stockpiled soils should be placed next to the excavation pits. The stockpiles must be banded by suitable material that can resist heavy rains and prevent increased run-off (for example fixed wooden planks or bricks).</p> <p>15. Any mixing of cement must either only take place over a covered surface nearby or beside the excavation pit. Cement mixing can take place in the load bin of a vehicle. It is important that no cement spills unnecessarily in the area around the tower construction area for risk of entering the</p>	

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IMPACT	SURFACE WATER AND GROUNDWATER This section deals with surface and groundwater and actions that need to be implemented during construction		RESPONSIBILITY
PHASE	CONSTRUCTION		ECO / Main Contractor
ENVIRONMENTAL MANAGEMENT PROGRAMME			
	<p>watercourses.</p> <p>16. Importantly portable sanitary facilities are to be used and must be placed outside of the watercourse and associated buffer zone areas.</p> <p>17. Watercourses must be cordoned off around the construction areas and the RoW to prevent any unnecessary access by unauthorised personnel or vehicles. These areas must be identified as "no-go" zones.</p> <p>18. Vegetation must not to be damaged or removed unless they are located within the construction footprint of the towers or RoW tracks. Where sensitive vegetation is identified in the foot print of a tower, the relevant authority must be contacted and must advise on the most appropriate plan of action (i.e. removal and/or translocation).</p> <p>19. Stringing operations must be undertaken by hand where possible and not vehicles to limit ingress and associated damage through and across wetlands.</p> <p>20. The fitment of bird anti-collision devices over the watercourse sections of the power lines must take place on the ground prior to stringing. If a water use license has been obtained it is still recommended that the fitment of bird anti-collision devices take place on the ground prior to stringing in order to prevent the need for vehicles to undergo operations in problematic areas (i.e. through watercourses).</p> <p>21. A site-specific post-construction wetland rehabilitation plan must be compiled by a suitably qualified wetland or aquatic specialist to rehabilitate and monitor the affected watercourses and associated buffer zones where construction impacts have been caused.</p>		

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2.3.8 Waste Management

Table 15: Waste Management

IMPACT	WASTE MANAGEMENT This section deals with waste management and actions that need to be implemented during construction	RESPONSIBILITY
PHASE	CONSTRUCTION	ELO
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
MITIGATION / METHOD STATEMENT	<p>1. A waste management plan should be developed and adhered to in order to effectively manage all construction waste.</p> <p><b>Litter management</b></p> <ol style="list-style-type: none"> <li>2. The contractor should take steps to ensure that littering by construction workers does not occur.</li> <li>3. Refuse bins must be placed at strategic positions to ensure that litter does not accumulate within the construction site.</li> <li>4. The Contractor shall supply waste collection bins where such is not available and all solid waste collected shall be disposed of at registered/licensed landfill.</li> <li>5. A housekeeping team should be appointed to regularly maintain the litter and rubble situation on the construction site.</li> <li>6. All waste generated on site must be separated into glass, plastic, paper, metal and wood and recycled. An independent contractor can be appointed to conduct this recycling.</li> <li>7. In general, any litter must be cleared immediately.</li> <li>8. Littering by the employees of the Contractor shall not be allowed under any circumstances. The ECO shall monitor the neatness of the work sites as well as the Contractor campsite.</li> <li>9. Skip waste containers should be maintained on site. These should be kept covered and arrangements made for them to be collected regularly.</li> <li>10. All waste must be removed from the site and transported to a landfill site promptly to ensure that it</li> </ol>	

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IMPACT	WASTE MANAGEMENT This section deals with waste management and actions that need to be implemented during construction	RESPONSIBILITY
PHASE	CONSTRUCTION	ELO
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>	<p>does not attract vermin or produce odours.</p> <p>11. Where a registered waste site is not available close to the construction site, the Contractor shall provide a method statement with regard to waste management.</p> <p>12. The Contractor must have a certificate of disposal which should be kept on file.</p> <p>13. Under no circumstances may solid waste be burnt on site.</p> <p>14. It is important that the contractors (and sub-contractors by implication) and workers must be informed of the facilities and procedures available for the disposal of waste.</p> <p><b>Hazardous waste</b></p> <p>15. All waste hazardous materials must be carefully stored as advised by the ECO, and then disposed of off-site at a licensed landfill site, where practical.</p> <p>16. Contaminants must be stored safely to avoid spillage.</p> <p>17. Machinery must be properly maintained to keep oil leaks in check.</p> <p>18. All necessary precaution measures shall be taken to prevent soil or surface water pollution from hazardous materials used during construction and any spills shall immediately be cleaned up and all affected areas rehabilitated.</p> <p><b>Sanitation</b></p> <p>Male and females must be accommodated separately.</p> <p>19. Toilets must be serviced weekly and the ECO must inspect toilets regularly.</p> <p>20. Toilets should be no closer than 50m from any natural water bodies or boreholes or above the 1:100 year flood line from any natural or manmade water bodies or drainage lines or alternatively located in a</p>	

IMPACT	WASTE MANAGEMENT This section deals with waste management and actions that need to be implemented during construction	RESPONSIBILITY
PHASE	CONSTRUCTION	ELO
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
	<p>place approved of by the Engineer.</p> <p>21. Under no circumstances may open areas, neighbours fences or the surrounding bush be used as a toilet facility.</p> <p>22. The construction of "Long Drop" toilets is forbidden. Toilets connected to the sewage treatment plant or chemical toilets are preferable.</p> <p>23. Potable water must be provided for all construction staff.</p> <p><b>Remedial actions</b></p> <p>24. Depending on the nature and extent of the spill, contaminated soil must be either excavated or treated on-site.</p> <p>25. Excavation of contaminated soil must involve careful removal of soil using appropriate tools/machinery to storage containers until treated or disposed of at a licensed hazardous landfill site.</p> <p>26. The ECO must determine the precise method of treatment for polluted soil. This could involve the application of soil absorbent materials as well as oil-digestive powders to the contaminated soil.</p> <p>27. If a spill occurs on an impermeable surface such as cement or concrete, the surface spill must be contained using oil absorbent material.</p> <p>28. If necessary, oil absorbent sheets or pads must be attached to leaky machinery or infrastructure.</p> <p>29. Materials used for the remediation of petrochemical spills must be used according to product specifications and guidance for use.</p> <p>30. Contaminated remediation materials must be carefully removed from the area of the spill so as to prevent further release of petrochemicals to the environment, and stored in adequate containers until appropriate disposal.</p>	

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2.3.9 Biodiversity

Table 16: Biodiversity

IMPACT	<b>BIODIVERSITY (incl Avifauna)</b> This section deals with flora and fauna actions that need to be implemented during construction	RESPONSIBILITY
PHASE	CONSTRUCTION	ELO
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
MITIGATION / METHOD STATEMENT	<p><b>Existing vegetation</b></p> <ol style="list-style-type: none"> <li>1. Vegetation removal must be limited to the 31m servitude.</li> <li>2. Vegetation removal must be phased in order to reduce impact of construction.</li> <li>3. Vegetation clearing on tower sites must be kept to a minimum.</li> <li>4. Big trees with large root systems shall be cut manually and removed, as the use of a bulldozer will cause major damage to the soil when the root systems are removed. Stumps shall be treated with herbicide.</li> <li>5. Smaller vegetation can be flattened with a machine, but the blade should be kept above ground level to prevent scalping. Any vegetation cleared on a tower site shall be removed or flattened and not be pushed to form an embankment around the tower.</li> <li>6. Trees and vegetation not interfering with the statutory clearance to the conductors can be left under the line. Dense vegetation under the line which could cause a fire hazard, particularly in the middle third of the span in the vicinity of the lowest point of the conductors, will be considered as a separate case.</li> <li>7. Upon completion of the stringing operations and before handover, the servitude must be inspected and all vegetation interfering with the safe operation of the line shall be removed / cut down.</li> <li>8. Materials should not be delivered to the site prematurely which could result in additional areas being cleared or affected.</li> </ol> <p><b>Fauna occurring in the study area</b></p>	

IMPACT	BIODIVERSITY (incl Avifauna) This section deals with flora and fauna actions that need to be implemented during construction	RESPONSIBILITY
PHASE	CONSTRUCTION	ELO
ENVIRONMENTAL MANAGEMENT PROGRAMME		
	<p>9. Rehabilitation to be undertaken as soon as possible after construction has been completed.</p> <p>10. No trapping or snaring to fauna on the construction site is allowed.</p> <p>11. No faunal species must be harmed by maintenance staff during any routine maintenance at the development.</p> <p>12. Pits and excavations must be regularly checked for animals that may have fallen in.</p> <p>13. Animals occurring on site must be left alone. The ECO must be consulted and before removing any animals obstructing construction activities. The ECO will provide assistance in their removal.</p> <p><b>Demarcation of construction and laydown areas</b></p> <p>14. All plants not interfering with the construction shall be left undisturbed clearly marked and indicated on the site plan.</p> <p>15. Construction site office and laydown areas must be clearly demarcated and no encroachment must occur beyond demarcated areas.</p> <p>16. Soils must be kept free of petrochemical solutions that may be kept on site during construction. Spillage can result in a loss of soil functionality thus limiting the re-establishment of flora.</p> <p><b>Utilisation of resources</b></p> <p>17. Gathering of firewood, fruit, multi plants, or any other natural material onsite or in areas adjacent to the site is prohibited unless with prior approval of the ECO.</p> <p><b>Exotic vegetation</b></p> <p>18. All exotic vegetation must be removed from the site (if present).</p> <p>19. Alien vegetation on the site will need to be controlled.</p>	

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IMPACT	BIODIVERSITY (incl Avifauna) This section deals with flora and fauna actions that need to be implemented during construction	RESPONSIBILITY
PHASE	CONSTRUCTION	ELO
ENVIRONMENTAL MANAGEMENT PROGRAMME		
	<p>20. The contractor should be responsible for implementing a programme of weed control (particularly in areas where soil has been disturbed); and grassing of any remaining stockpiles to prevent weed invasion.</p> <p>21. The spread of exotic species occurring throughout the site should be controlled. Emergence of alien invasive species must be avoided.</p> <p><b>Vegetation removal</b></p> <p>22. Herbicide use shall only be allowed according to contract specifications. The application shall be according to set specifications and under supervision of a qualified technician. The possibility of leaching into the surrounding environment shall be properly investigated and only environmentally friendly herbicides shall be used.</p> <p>23. The use of pesticides and herbicides on the site must be discouraged as these impact on important pollinator species of indigenous vegetation.</p>	
SITE SPECIFIC MITIGATION		
MITIGATION / METHOD STATEMENT	Protected Vegetation	
	<p>24. <i>Acacia erioloba</i> (Camel Thorn) is declining and protected; Removal or unnecessary destruction of these larger individuals should, be avoided as far as possible.</p> <p>25. <i>Boscia albitrunca</i> (Shepherd's Tree) is protected; This species should be allowed to remain <i>in situ</i> where it occurs within the servitude areas as far as possible.</p> <p><b>Loss of habitat for red data / general species</b></p> <p>26. Existing servitudes and roadways should be utilised as far as possible, thereby limiting the impact of establishing new service roads.</p>	

IMPACT	BIODIVERSITY (incl Avifauna) This section deals with flora and fauna actions that need to be implemented during construction	RESPONSIBILITY
PHASE	CONSTRUCTION	ELO
ENVIRONMENTAL MANAGEMENT PROGRAMME		
	<p>27. It is recommended that a conservation buffer zone be applied to all the surrounding suitable wetland habitat units.</p> <p>28. Existing indigenous vegetation within the servitude of the power line must be retained where possible.</p> <p>29. No indigenous, Red Data and protected species may be distributed or removed without the necessary permits or licenses.</p> <p>30. Remove and relocate any plants of botanical or ecological significance (these must be indicated by the ECO). Individuals can be translocated to outside of the footprint area or removed to a suitable botanical garden for cultivation and protection. This should only be done after consultation with the provincial conservation authorities.</p> <p>31. Movement of personnel and machinery to be limited to the areas designated for the established access roadways.</p> <p>32. Indiscriminate damage of vegetation to be avoided.</p> <p>33. Any recruitment of exotic vegetation to be managed on an ongoing basis until indigenous pioneering vegetation has dominated the disturbed areas. These species should be limited to naturally-occurring species representative of the vegetation type for the locality. Ongoing monitoring of exotic vegetation recruitment should be undertaken and any recruitment controlled</p> <p>34. Special measures should be provided for the protection of certain forests, woodlands and trees.</p> <p>35. Only the taller floral species and those individuals that pose a significant fire risk to the overhead power line should be removed within the servitude areas. Forested gullies, valleys and riparian vegetation should be spanned as far as possible from higher ground so that the removal of vegetation can be minimised</p> <p>36. Dumping or storage of topsoil must not be done on established vegetation, but should remain within designated areas</p>	

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IMPACT	BIODIVERSITY (incl Avifauna)	RESPONSIBILITY
PHASE	This section deals with flora and fauna actions that need to be implemented during construction	ELO
ENVIRONMENTAL MANAGEMENT PROGRAMME		
	<p>37. Workers and machinery to remain inside construction footprint. All labourers to be informed of disciplinary actions for the willful damage to plants.</p> <p>38. Important habitat to avifaunal conservation within the area (i.e. wetland habitat) should be avoided.</p> <p>39. Protected areas within the survey area should be avoided as far as possible and the route alternatives that would impact the least on protected areas should be preferred.</p> <p>40. Aim at making the overhead line more visible to flying birds and migratory routes should be avoided where possible.</p> <p>41. Bird flappers should be fitted along all areas where migratory routes have been identified within the survey area along the chosen preferred route alternative.</p> <p>42. Perch management through the use of perch deterrents (bird guards) can be used and fitted at least 1m directly above and on both sides of the phase conductor. Open perch areas should be allowed to remain (van Rooyen, 2004).</p>	

### 2.3.10 Air Quality

Table 17: Air Quality

IMPACT	AIR QUALITY	RESPONSIBILITY
PHASE	This table deals with mitigation measures to prevent air pollution	ELO
ENVIRONMENTAL MANAGEMENT PROGRAMME		

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IMPACT	AIR QUALITY	RESPONSIBILITY
<b>MITIGATION / METHOD STATEMENT</b>	<p>This table deals with mitigation measures to prevent air pollution</p> <p><b>Dust control</b></p> <ol style="list-style-type: none"> <li>1. Wheel washing and damping down of un-surfaced and un-vegetated areas must occur in areas close to potential receptors of dust pollution. The ECO and ELO must identify these areas prior to construction starting in that particular area or prior to construction traffic needing to move along un-surfaced roads in certain areas.</li> <li>2. Vegetation must be retained where possible in order to reduce dust travel.</li> <li>3. Excavations and other clearing activities must only be done during agreed working times and permitting weather conditions to avoid drifting of sand and dust into neighbouring areas.</li> <li>4. The Contractor shall be responsible for dust control on site to ensure no nuisance is caused to sensitive receptors such as landowners and neighbouring communities.</li> <li>5. Dust generation must be kept to a minimum and suppressed on access roads and construction areas during dry periods.</li> <li>6. Speed limits on un-surfaced roads must not be exceeded.</li> <li>7. Speed limits for construction vehicles must be clearly signposted and must be monitored by the ECO and ECO.</li> <li>8. Any complaints or claims emanating from the lack of dust control shall be attended to immediately by the ELO under the supervision of the ECO.</li> </ol>	

### 2.3.11 Noise and Vibrations

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Table 18: Noise and Vibrations

IMPACT	NOISE This section deals with noise and actions that need to be implemented during construction	RESPONSIBILITY
PHASE	CONSTRUCTION	ELO
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
<b>MITIGATION / METHOD STATEMENT</b>	<ol style="list-style-type: none"> <li>1. The construction phase must aim to adhere to the relevant noise regulations and limit noise to within standard working hours in order to reduce disturbance of dwellings in close proximity to the development.</li> <li>2. Truck traffic should be routed away from noise sensitive areas, where possible.</li> <li>3. Noise levels must be kept within acceptable limits as recommended by SANS 10103:2003.</li> <li>4. Noisy operations should be combined so that they occur where possible at the same time.</li> <li>5. Construction activities are to be contained to reasonable hours during the day and early evening. Night-time activities near noise sensitive areas must not be allowed.</li> <li>6. Construction workers to wear necessary ear protection gear.</li> <li>7. Noisy activities should take place during normal working hours (06h00 to 17h00) Monday to Saturday.</li> <li>8. Noise from labourers must be controlled.</li> <li>9. Noise suppression measures must be applied to all construction equipment. Construction equipment must be kept in good working order and where appropriate fitted with silencers which are kept in good working order. Should the vehicles or equipment not be in good working order, the contractor may be instructed to remove the offending vehicle or machinery from site.</li> <li>10. The contractor must take measures to discourage labourers from loitering in the area and causing noise disturbance. Where possible labour shall be transported to and from the site by the contractor or his Sub-Contractors by the contractors own transport.</li> <li>11. Apply regular and thorough maintenance schedules to equipment and processes. An increase in noise emission levels very often is a sign of the imminent mechanical failure of a machine.</li> <li>12. Should blasting be required, the contractor will need to obtain a blasting permit. Moreover, the contractor must make the public aware of when blasting is to take place as well as the specific times of</li> </ol>	

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<b>IMPACT</b>	<b>NOISE</b> This section deals with noise and actions that need to be implemented during construction	<b>RESPONSIBILITY</b>
<b>PHASE</b>	<b>CONSTRUCTION</b>	ELO
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>	blasting. Blasting activities must take place at reasonable times and during daily working hours.	

### 2.3.12 Energy Use

Table 19: Energy use

<b>IMPACT</b>	<b>ENERGY USE</b> This section deals with energy use and actions that need to be implemented during construction	<b>RESPONSIBILITY</b>
<b>PHASE</b>	<b>CONSTRUCTION</b>	ELO
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
<b>MITIGATION / METHOD STATEMENT</b>	<ol style="list-style-type: none"> <li>1. Energy saving lighting must be implemented across the board.</li> <li>2. Minimal lighting, while maintaining health and safety regulations, must be kept on during the night operations.</li> <li>3. Equipment not in use must be switched off and unplugged to save on unnecessary energy costs and carbon footprint.</li> </ol>	

### 2.3.13 Employment

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Table 20: Employment

IMPACT	EMPLOYMENT This section deals with employment and actions that need to be implemented during construction	RESPONSIBILITY
PHASE	CONSTRUCTION	MC
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
<b>MITIGATION / METHOD STATEMENT</b>	<p data-bbox="454 582 502 1758"><b>Labour</b></p> <ol data-bbox="502 582 582 1758" style="list-style-type: none"> <li data-bbox="502 582 534 1758">1. The use of labour intensive construction measures should be used where appropriate.</li> <li data-bbox="534 582 582 1758">2. Labour must be trained to benefit individuals beyond completion of the project.</li> </ol> <p data-bbox="598 582 630 1758"><b>Recruitment Plan</b></p> <ol data-bbox="630 582 1141 1758" style="list-style-type: none"> <li data-bbox="630 582 710 1758">3. All unskilled labourers should be drawn from the local market i.e. and where possible use should be made of local semi-skilled and skilled personnel.</li> <li data-bbox="710 582 742 1758">4. Local suppliers to be used where possible.</li> <li data-bbox="742 582 821 1758">5. Ensure adequate advertising in the project community areas, local papers for skilled labour. Adverts will be placed in each area where the public meetings were conducted.</li> <li data-bbox="821 582 853 1758">6. Local community leaders as well as the Local Municipalities must be utilised to source labour.</li> <li data-bbox="853 582 933 1758">7. The recruitment process must be equitable and transparent. A concerted effort will be made to guard against nepotism and/or any form of favouritism during the process.</li> <li data-bbox="933 582 1013 1758">8. The informal daily recruitment of workers at the construction camp must be avoided in order to prevent the congregation and loitering of job seekers at the construction camp.</li> <li data-bbox="1013 582 1093 1758">9. The recruitment of skilled labour will follow standard advertising process in national newspapers and interview based selection.</li> <li data-bbox="1093 582 1141 1758">10. Record of official complaints by employees to authorities must be kept i.e. Labour and Social Security (Annexure A for complaints record sheet).</li> </ol>	
<b>SITE SPECIFIC MITIGATION</b>		
	11. The number and types of jobs available should be effectively communicated to surrounding communities.	

2.3.14 Occupational Health and Safety

Table 21: Occupational Health and Safety

IMPACT	HEALTH AND SAFETY This section deals with health and safety and actions that need to be implemented during construction	RESPONSIBILITY
PHASE	CONSTRUCTION	MC/ SAFETY OFFICER
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
<b>MITIGATION / METHOD STATEMENT</b>	<p><b>Worker safety</b></p> <ol style="list-style-type: none"> <li>1. Safety measures for work procedures must be implemented.</li> <li>2. First aid kits must be available and accessible on site.</li> <li>3. A health and safety plan in terms of the Occupational Health and Safety Act (Act No. 85 of 1993) must be drawn up by the Contractor and approved by the ECO to ensure worker safety.</li> <li>4. Workers should be thoroughly trained in using potentially dangerous equipment.</li> <li>5. Contractors must ensure that all equipment is maintained in a safe operating condition.</li> <li>6. A safety officer must be appointed.</li> <li>7. A record of health and safety incidents must be kept on site.</li> <li>8. Any health and safety incidents must be reported to the Project Manager immediately.</li> <li>9. First aid facilities must be available on site at all times and a number of employees trained to carry out first aid procedures.</li> <li>10. Workers have the right to refuse work in unsafe conditions.</li> <li>11. The Contractor must take all the necessary precautions against the spreading of disease such as measles, foot and mouth, etc. especially under livestock.</li> <li>12. A record must be kept of drugs administered to construction staff or precautions taken and the time and dates when this was done. This can then be used as evidence in court should any claims be instituted against Eskom or the Contractor.</li> </ol>	

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IMPACT	HEALTH AND SAFETY This section deals with health and safety and actions that need to be implemented during construction	RESPONSIBILITY
PHASE	CONSTRUCTION	MC/ SAFETY OFFICER
ENVIRONMENTAL MANAGEMENT PROGRAMME		
	<p>13. The contractor must ensure that all construction workers are well educated about HIV/ AIDS and the risks surrounding this disease. The location of the local clinic where more information and counselling is offered must be indicated to workers.</p> <p>14. Material stockpiles or stacks must be stable and well secured to avoid collapse and possible injury to site workers / local residents.</p> <p><b>Worker facilities</b></p> <p>15. Eating areas should be regularly serviced and cleaned to ensure the highest possible standards of hygiene and cleanliness.</p> <p>16. Ablution facilities must be well maintained.</p> <p><b>Hazardous substances</b></p> <p>17. Working areas should be provided with adequate ventilation and dust/fume extraction systems to ensure that inhalation exposure levels for potentially corrosive, oxidizing, reactive or siliceous substances are maintained and managed at safe levels.</p> <p>18. Eye wash and emergency shower systems should be provided in areas where there exists the possibility of chemical containment of workers and the need for rapid treatment.</p> <p><b>Electrical Safety and isolation</b></p> <p>19. Use of electrical safety devices on all final distribution circuits and appropriate testing schedules applied to such safety systems.</p>	

IMPACT	HEALTH AND SAFETY This section deals with health and safety and actions that need to be implemented during construction	RESPONSIBILITY
PHASE	CONSTRUCTION	MC/ SAFETY OFFICER
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
	<p>20. All sources of hazardous energy or hazardous substances should have written procedures for isolation, identifying how the system, plant or equipment can be made and kept safe.</p> <p><b>Physical Hazards</b></p> <p>21. Geotechnical safety - All structures must be planned, designed and operated such that the geotechnical risks are appropriately managed.</p> <p><b>Machine and Equipment</b></p> <p>22. Use must be made of contrast colouring on equipment/machinery including the provision of reflective markings to enhance visibility.</p> <p>23. Use must be made of moving equipment/machinery equipped with improved operator sight lines.</p> <p>24. Workers must be issued with high visibility clothing.</p> <p>25. Use must be made of reflective markings on structures, traffic junctions, and other areas with a potential for accidents.</p> <p>26. Safety barriers must be installed in high risk locations.</p> <p><b>Fitness for work</b></p> <p>27. Shift management systems must minimize risk of fatigue. Establish alcohol and other drug policy for the operation.</p> <p><b>Travel and remote site health</b></p>	

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IMPACT	HEALTH AND SAFETY This section deals with health and safety and actions that need to be implemented during construction	RESPONSIBILITY
PHASE	CONSTRUCTION	MC/ SAFETY OFFICER
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
	<p>28. Develop programs to prevent both chronic and acute illnesses through appropriate sanitation and vector control systems.</p> <p>29. Food preparation areas should be provided with adequate washing facilities.</p> <p>30. Where food is prepared, food preparation storage and disposal should be reviewed regularly and monitored to minimise risk of illness.</p> <p><b>Protective gear</b></p> <p>31. Personal Protective Equipment (PPE) must be made available to all construction staff and must be compulsory. Hard hats and safety shoes must be worn at all times and other PPE worn where necessary i.e. dust masks, ear plugs etc.</p> <p>32. No person is to enter the site without the necessary PPE.</p> <p><b>Site safety</b></p> <p>33. The construction camp must remain fenced for the entire construction period.</p> <p>34. Potentially hazardous areas are to be demarcated and clearly marked.</p> <p>35. Adequate warning signs of hazardous working areas must be in place.</p> <p>36. Emergency numbers for local police and fire department etc must be placed in a prominent area.</p> <p>37. Suitable conspicuous warning signs in English and all other applicable languages must be placed at all entrances to the site.</p> <p>38. All speed limits must be adhered to.</p>	

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IMPACT	HEALTH AND SAFETY This section deals with health and safety and actions that need to be implemented during construction	RESPONSIBILITY
PHASE	CONSTRUCTION	MC/ SAFETY OFFICER
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
	<p><b>Construction equipment safety</b></p> <p>39. All equipment used for construction must be in good working order with up to date maintenance records.</p> <p><b>Procedure in the event of a petrochemical spill</b></p> <p>40. The individual responsible for or who discovers the petrochemical spill must report the incident to the Project Manager, Contractor or ECO.</p> <p>41. The problem must be assessed and the necessary actions required will be undertaken.</p> <p>42. The immediate response must be to contain the spill.</p> <p>43. The source of the spill must be identified, controlled, treated or removed wherever possible.</p> <p><b>Fire management</b></p> <p>44. All flammable substances must be stored in dry areas which do not pose an ignition risk to the said substances.</p> <p>45. Fire fighting equipment must be placed in prominent easily accessible position across the site at all times. This includes fire extinguishers, a fire blanket as well as a water tank.</p> <p>46. Smoking may only be conducted in demarcated areas.</p> <p>47. Contact should be made with the local Fire Protection Agency (FPA) if one exists.</p> <p><b>Safety of surrounding residents</b></p> <p>48. All I&amp;AP's should be notified in advance of any known potential risks associated with the construction</p>	

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IMPACT	HEALTH AND SAFETY This section deals with health and safety and actions that need to be implemented during construction	RESPONSIBILITY
PHASE	CONSTRUCTION	MC/ SAFETY OFFICER
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
	<p>site and the activities on it. Examples of these are:</p> <ul style="list-style-type: none"> <li>▪ Earthworks / earthmoving machinery on steep slopes above houses / infrastructure;</li> <li>▪ Risk to residence along haulage roads / access routes.</li> </ul> <p><b>Emergency evacuation plan</b></p> <p>49. 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.</p> <p>50. All permanent staff must undergo safety training.</p> <p><b>Maintenance</b></p> <p>51. The corridor and surrounding areas are to be regularly maintained. A maintenance schedule must be drawn up and records of all maintenance kept.</p>	

2.3.15 Security

Table 22: Security

IMPACT	SECURITY This section deals with security and actions that need to be implemented during construction	RESPONSIBILITY

PHASE	CONSTRUCTION	MC /SAFETY OFFICER
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
<b>MITIGATION / METHOD STATEMENT</b>	<ol style="list-style-type: none"> <li>1. A security company should be employed to guard the construction site and monitor access. This company should also be utilised for the operation phase.</li> <li>2. Labour should be transported to and from the site to discourage loitering in adjacent areas and possible increase in crime or disturbance.</li> <li>3. Unsocial activities such as consumption or illegal selling of alcohol, drug utilisation or selling and prostitution on site shall be prohibited. Any persons found to be engaged in such activities should receive disciplinary or criminal action taken against them.</li> <li>4. Only pre-approved staff must be permitted to stay within the staff accommodation which will be provided.</li> <li>5. The site shall be fenced, where necessary to prevent any loss or injury to persons during the construction phase.</li> <li>6. During periods of temporary site closure, the site should be secured to ensure no access to the site. This applies to the construction camp as well.</li> <li>7. No alcohol / drugs to be present on site.</li> <li>8. No firearms allowed on site or in vehicles transporting staff to / from site (unless used by security personnel).</li> <li>9. Construction staff is to make use of the facilities provided for them, as opposed to ad-hoc alternatives (e.g. fires for cooking, the use of surrounding bush as a toilet facility are forbidden).</li> <li>10. Trespassing on private / commercial properties adjoining the site is forbidden.</li> <li>11. All employees must undergo the necessary safety training and wear the necessary protective clothing.</li> <li>12. The ELO must timeously inform affected landowners where construction is to occur of the onset of the construction process.</li> <li>13. Driving under the influence of alcohol is prohibited.</li> <li>14. The site must be secured in order to reduce the opportunity for criminal activity in the locality of the</li> </ol>	

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<b>IMPACT</b>	<b>SECURITY</b> This section deals with security and actions that need to be implemented during construction	<b>RESPONSIBILITY</b>
<b>PHASE</b>	<b>CONSTRUCTION</b>	<b>MC /SAFETY OFFICER</b>
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
	construction site.	

### 2.3.16 Social Environment

Table 23: Social Environment

<b>IMPACT</b>	<b>SOCIAL ENVIRONMENT</b> This section deals with social environment and actions that need to be implemented during construction	<b>RESPONSIBILITY</b>
<b>PHASE</b>	<b>CONSTRUCTION</b>	<b>MC / ELO</b>
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
<b>MITIGATION / METHOD STATEMENT</b>	<ol style="list-style-type: none"> <li>1. All contact with the affected parties shall be courteous at all times. The rights of the affected parties shall be respected at all times.</li> <li>2. The successful completion of the project depends a lot on the good relations with the landowners. it would be preferable if the ELO is the liaison officer for the entire contract.</li> <li>3. The ELO shall be available to investigate all problems arising on the work sites concerning the landowners.</li> <li>4. All negotiations (if required) for any reason shall be conducted between the ECO the landowners and the Contractor (ELO) with the ECO present.</li> <li>5. The landowners shall always be kept informed by the ELO about any changes to the construction programme should they be affected.</li> </ol>	

IMPACT	SOCIAL ENVIRONMENT This section deals with social environment and actions that need to be implemented during construction	RESPONSIBILITY
PHASE	CONSTRUCTION	MC / ELO
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
	<p>6. The contact numbers of the ELO and the Eskom ECO shall be made available to the landowners. This will ensure open channels of communication and prompt response to queries and claims.</p> <p>7. A complaints register should be kept on site (A complaints record sheet is provided in annexure A). Details of complaints should be incorporated into the audits as part of the monitoring process. This should be in carbon copy format, with numbered pages. Any missing pages must be accounted for by the Contractor.</p> <p>8. Damage to infrastructure shall not be tolerated and any damage shall be rectified immediately by the Contractor. A record of all damage and remedial actions shall be kept on site.</p> <p>9. Care must be taken not to damage irrigation equipment, lines, channels and crops, as this could lead to major claims being instituted against Eskom and the Contractor.</p> <p>10. A policy on Contractor Health and Safety for the duration of the construction work on site, must apply, and be monitored.</p> <p>11. A proper security strategy must be in place for site specific crimes.</p>	
<b>SITE SPECIFIC MITIGATION</b>		
<b>MITIGATION / METHOD STATEMENT</b>	<p><b>Temporary loss of agricultural land</b></p> <p>12. Build a 'good neighbour' relationship with landowners by informing them upfront of when and where construction will take place on their property and stick to agreed timeframes and places.</p> <p><b>Other Temporary employment</b></p> <p>13. Where project activities lead to the creation of informal job opportunities such as food stalls, contractors should be encouraged to allow such activities as long as it does not interfere with the</p>	

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IMPACT	SOCIAL ENVIRONMENT This section deals with social environment and actions that need to be implemented during construction	RESPONSIBILITY
PHASE	CONSTRUCTION	MC / ELO
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
	<p>construction activities itself or the safety of the construction site, the informal vendor and/or the construction workers.</p> <p><b>Accommodation for construction workers</b></p> <p>14. Construction workers should only be housed in rooms within formal houses, i.e. no 'backyard shacks' should be permitted – this is to avoid people expanding their houses informally to accommodate construction workers and to ensure that all construction workers enjoy the same standard of living</p> <p>15. The monthly rent payable to a 'landlord/landlady' must be reasonable and should take a proportion of the utilities service bill into account. A formal rental agreement should be in place that sets out the monthly rent amount and the terms and conditions of the rental agreement.</p> <p>16. Remedial steps must be taken against households that accommodate construction workers but who fail to comply with the minimum requirements of the rental agreement. These households should first be requested in writing to rectify any problem areas within a given timeframe and if they fail to do so, the rental agreement should be suspended and the construction worker moved to a different household.</p> <p><b>Appropriate Conduct</b></p> <p>17. Instruct construction workers, prior to arrival, as to the appropriate conduct on site, and to control substance abuse/use. Inform them of the local norms, languages, and custom.</p> <p>18. The code of conduct is important and should be prepared and implemented among construction workers.</p>	

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IMPACT	SOCIAL ENVIRONMENT This section deals with social environment and actions that need to be implemented during construction	RESPONSIBILITY
PHASE	CONSTRUCTION	MC / ELO
ENVIRONMENTAL MANAGEMENT PROGRAMME		
	<p><b>Conflict</b></p> <p>19. Problem areas that are brought under the attention of the contractor should be rectified immediately. If the contractor is unable to do so, this should be communicated to the landowner along with a plan on how and when the problem will be addressed. The landowner should be given regular feedback on the matter.</p> <p>20.</p>	

### 2.3.17 Community Engagement

Table 24: Community Engagement

IMPACT	COMMUNITY ENGAGEMENT This section deals with surrounding community and actions that need to be implemented during construction	RESPONSIBILITY
PHASE	CONSTRUCTION	ELO
ENVIRONMENTAL MANAGEMENT PROGRAMME		
MITIGATION	<ol style="list-style-type: none"> <li>1. A communication guideline to be drafted and agreed upon with authority representatives and affected communities.</li> <li>2. Open and transparent community engagement to be followed as culturally appropriate.</li> <li>3. Records (written) to be kept of all community engagements (e.g. complaints, resolutions, etc)</li> </ol>	

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2.3.18 Visual Impact

Table 25: Visual Impact

IMPACT	VISUAL	RESPONSIBILITY
	This section deals with visual issues and actions that need to be implemented during construction	ELO
PHASE	CONSTRUCTION	
ENVIRONMENTAL MANAGEMENT PROGRAMME		
MITIGATION / METHOD STATEMENT	<p>General</p> <ol style="list-style-type: none"> <li>Construction activities must not occur outside of stipulated working hours and lighting should only be erected where absolutely necessary.</li> <li>Construction camps and equipment storage facilities are to be shielded with shade netting.</li> <li>Construction traffic must not deviate from designated routes or access roads.</li> <li>Labour being transported to the site must take cognisance of litter and waste concerns.</li> <li>Equipment being transported to the site must be covered with tarpaulins.</li> <li>It is recommended that equipment be stored discreetly so as not to increase visual impacts.</li> <li>Construction must be conducted in the shortest possible time in order to reduce visual impacts.</li> </ol>	

2.3.19 Heritage and Cultural Resources

Table 26: Heritage and Cultural Resources

IMPACT	HERITAGE AND CULTURAL RESOURCES	RESPONSIBILITY
	This section deals with heritage and cultural issues as well as actions that need to be implemented during construction	ELO
PHASE	CONSTRUCTION	
ENVIRONMENTAL MANAGEMENT PROGRAMME		

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<b>MITIGATION / METHOD STATEMENT</b>	<ol style="list-style-type: none"> <li>1. A responsible archaeologist must be appointed to inspect the operational areas of the site in order to identify any significant material being unearthed, and to make the correct judgment on actions to be taken.</li> <li>2. A permit in terms of section 34 of the National Heritage Resources Act 1999 ( Act 25 of 1999) must be obtained, if any archaeological resources, such as built structures older than 60 years, sites of cultural significance associated with oral histories, burial grounds or graves and cultural landscapes, are discovered during the construction phase of the project and which will be damaged, destroyed, altered, or disturbed as a result of the project.</li> <li>3. A destruction permit will be required under the Section 34 of the NHRA (if applicable).</li> <li>4. An archaeologist must immediately be appointed should any artefacts be unearthed during construction.</li> <li>5. Should substantial fossils be uncovered they should be left <i>in situ</i>, safeguarded by the Environmental Control Officer and reported to SAHRA and a professional palaeontologist.</li> <li>6. A poster reminding workers of the possibility of finding archaeological sites, should be kept on site.</li> <li>7. An archaeological monitoring and feedback strategy must be developed to ensure effective monitoring of the site and to provide feedback reports to the client and SAHRA.</li> </ol>	
<b>SITE SPECIFIC MITIGATION</b>		
	<ol style="list-style-type: none"> <li>8. Cemeteries, farmsteads, Iron age and stone age sites should be avoided as far as possible. Mitigation should take the form of isolating known sites and declare them as no-go zones with sufficient large buffer zones around them for protection. In exceptional cases mitigation can be implemented after required procedures have been followed.</li> <li>9. Permits from SAHRA would be required for heritage and stone age sites.</li> </ol>	

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## 2.4 Operation Phase

### 2.4.1 Construction Site Decommissioning

Table 27: Construction Site Decommissioning

IMPACT	<b>CONSTRUCTION SITE DECOMMISSIONING</b> This section deals with the demolishing of the construction camp and the actions that need to be implemented		RESPONSIBILITY
PHASE	OPERATION		Main contractor / Developer / ECO / ELO
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>			
<b>MITIGATION / METHOD STATEMENT</b>	<p><b>Removal of equipment</b></p> <ol style="list-style-type: none"> <li>All structures comprising the construction camp are to be removed from site.</li> <li>The area that previously housed the construction camp is to be checked for spills of substances such as oil etc, and these shall be remediated.</li> <li>All hardened surfaces within the construction camp area should be ripped, all imported materials removed, and the area shall be top soiled and regressed using the guidelines set out in the re-vegetation that forms part of this document.</li> </ol> <p><b>Temporary services</b></p> <ol style="list-style-type: none"> <li>The Contractor must arrange the cancellation of all temporary services.</li> <li>A copy of all weigh-bridge certificates from waste disposed are to be presented to the ECO.</li> <li>Temporary roads must be closed and access across these, blocked.</li> <li>All areas where temporary services were installed are to be rehabilitated to the satisfaction of the ECO.</li> </ol>		

IMPACT	CONSTRUCTION SITE DECOMMISSIONING This section deals with the demolishing of the construction camp and the actions that need to be implemented	RESPONSIBILITY
PHASE	OPERATION	Main contractor / Developer / ECO / ELO
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
<b>Associated infrastructure</b>		
<p>8. Surfaces are to be checked for waste products from activities such as concreting or asphaltting and cleared in a manner approved by the Engineer.</p> <p>9. All surfaces hardened due to construction activities are to be ripped and imported material thereon removed.</p> <p>10. All rubble is to be removed from the site to an approved disposal site as approved by the ECO. Burying of rubble on site is prohibited.</p> <p>11. The site is to be cleared of all litter.</p> <p>12. The Contractor is to check that all watercourses are free from building rubble, spoil materials and waste materials.</p> <p>13. Fences, barriers and demarcations associated with the construction phase are to be removed from the site unless stipulated otherwise by the Engineer.</p> <p>14. All residual stockpiles must be removed to spoil or spread on site as directed by the Engineer.</p> <p>15. All leftover building materials must be returned to the depot or removed from the site.</p> <p>16. The Contractor must repair any damage that the construction works has caused to neighbouring properties, specifically, but not limited to, damage caused by poor storm water management.</p> <p><b>Rehabilitation plan</b></p> <p>17. Rehabilitate and re-vegetate cleared areas with indigenous plant species.</p>		

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2.4.2 Rehabilitation and Maintenance

Table 28: Rehabilitation and Maintenance

IMPACT	REHABILITATION This section deals with the issues relating to rehabilitation after construction	RESPONSIBILITY
PHASE	OPERATION	Developer
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
<b>MITIGATION / METHOD STATEMENT</b>	<p><b>Rehabilitation</b></p> <ol style="list-style-type: none"> <li>1. All damaged areas shall be rehabilitated upon completion of the contract</li> <li>2. A mixture of vegetation seed can be used provided the mixture is carefully selected to ensure the following: <ul style="list-style-type: none"> <li>▪ Annual and perennial species are chosen.</li> <li>▪ Pioneer species are included.</li> <li>▪ All the species shall not be edible.</li> <li>▪ Species chosen will grow in the area under natural conditions.</li> <li>▪ Root systems must have a binding effect on the soil.</li> <li>▪ The final product should not cause an ecological imbalance in the area.</li> </ul> </li> <li>3. To get the best results in a specific area, it is advisable to consult with a vegetation specialist. Seed distributors can also give valuable advice as to the mixtures and amount of seed necessary to seed a certain area.</li> <li>4. All natural areas impacted during construction must be rehabilitated with locally indigenous grasses typical of the representative botanical unit.</li> <li>5. Rehabilitation must take place in a phased approach as soon as possible.</li> <li>6. Rehabilitation process must make use of species indigenous to the area. Seeds from surrounding seed banks can be used for re-seeding.</li> <li>7. Rehabilitation must be executed in such a manner that surface run-off will not cause erosion of disturbed areas.</li> </ol>	

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IMPACT	REHABILITATION This section deals with the issues relating to rehabilitation after construction	RESPONSIBILITY
PHASE	OPERATION	Developer
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
	8. Planting of indigenous tree species in areas not to be cultivated or built on must be encouraged.	
	<b>Maintenance</b> 9. The servitude needs to be monitored on a monthly basis for the first year to identify the emergence of alien species and any erosion concerns.	

#### 2.4.3 Operation and Maintenance

Table 29: Operation and Maintenance

IMPACT	OPERATION AND MAINTENANCE This section deals with the potential impacts that could result from the operation and maintenance of the line and substation.	RESPONSIBILITY
PHASE	OPERATION	ESKOM
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
<b>MITIGATION / METHOD STATEMENT</b>	<b>Maintenance</b> 1. All applicable standards, legislation, policies and procedures must be adhered to during operation. 2. Regular ground inspection of the servitude must take place to monitor their status. 3. Landowner conditions for accessing the servitude must be adhered to, and all gates must be kept open / closed subject to landowner requirements. 4. Only authorised Eskom personnel must access the servitude and properties that are required to be traversed in order to access the servitude	

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	<p><b>Public awareness</b></p> <p>5. The emergency preparedness plan must be ready for implementation at all times should an emergency situation arise.</p>	
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#### 2.4.4 Air Quality

Table 30: Air Quality

IMPACT	AIR POLLUTION This section deals with the issues relating to air pollution during operation	RESPONSIBILITY
PHASE	OPERATION	Developer
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
MITIGATION /	Dust management	
METHOD STATEMENT	<p>1. Any dirt roads utilised to access the sites must be regularly maintained and dust mitigation enforced to ensure that dust levels are controlled.</p> <p>Litter management</p> <p>2. Remove unwanted materials and litter on a regular basis to avoid potential odours.</p>	

#### 2.4.5 Biodiversity

Table 31: Biodiversity

IMPACT	BIODIVERSITY (FAUNA AND FLORA) This section details with the issues relating to biodiversity during operation	RESPONSIBILITY



PHASE	OPERATION	Developer
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
<b>MITIGATION / METHOD STATEMENT</b>	<p><b>Vegetation</b></p> <ol style="list-style-type: none"> <li>1. Indigenous vegetation must be maintained and all exotics removed as they appear and disposed of appropriately.</li> <li>2. Vegetative re-establishment shall, as far as possible, make use of indigenous or locally occurring plant varieties within the servitude.</li> <li>3. No streams, wetlands or riparian areas outside of agreed access routes must be traversed as part of operational work unless emergency access to the servitude in the areas is required.</li> <li>4. Herbicides to clear emergent bushy vegetation under the lines must not be used; instead vegetation control must be through mechanical means. No herbicides must be used within 150m of any surface water feature.</li> </ol> <p><b>Other fauna</b></p> <ol style="list-style-type: none"> <li>5. No faunal species must be harmed by maintenance staff during any routine maintenance at the development.</li> </ol>	
<b>SITE SPECIFIC MITIGATION</b>		
<b>MITIGATION / METHOD STATEMENT</b>	<p><b>Loss of habitat for red data / general species</b></p> <ol style="list-style-type: none"> <li>6. Maintain footprint strictly during operation</li> <li>7. Encroachment of alien vegetation to be monitored for regularly and controlled.</li> <li>8. Ecologically sensitive areas should be retained as prohibited areas to workers.</li> </ol> <p><b>Weed Control</b></p> <ol style="list-style-type: none"> <li>11. The client should be responsible for implementing a programme of weed control</li> <li>12. The spread of exotic species occurring throughout the site should be controlled.</li> <li>13. All exotic vegetation must be removed from the site (if present).</li> </ol>	

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<b>IMPACT</b>	<b>BIODIVERSITY (FAUNA AND FLORA)</b>	<b>RESPONSIBILITY</b>
<b>PHASE</b>	This section details with the issues relating to biodiversity during operation	Developer
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
	<p><b>Birds Collisions and Electrocutions</b></p> <p>14. New bird diverters must be maintained on the power lines.</p> <p>15. Maintenance crews to monitor for bird collisions and to mitigate for this impact within areas identified as hotspot collision areas not previously identified during the pre-construction and construction phase.</p> <p>16. Routine surveys should be undertaken once construction has been completed in order to identify any further collision hotspot areas. The sections of line within these areas should also be marked. The walk-through survey will also enable the identification of nesting activity within the area of various RDL species.</p>	

#### 2.4.6 Surface Water Resources

<b>IMPACT</b>	<b>SURFACE WATER</b>	<b>RESPONSIBILITY</b>
<b>PHASE</b>	This section deals with the issues relating to surface water during operation	Developer
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
<b>MITIGATION / METHOD STATEMENT</b>	<p><b>Site Access</b></p> <ol style="list-style-type: none"> <li>It is crucial that existing roads are used so that damage is limited. Where new service roads are required in the watercourses and the necessary environmental authorisations and water use licences are obtained, these roads must be limited in extent (i.e. go directly to the desired tower) and will need to be maintained for erosion.</li> <li>Vehicles must be restricted to smaller not heavy vehicles where possible. Activity must be limited to a narrow track or "Right of Way" (ROW) only.</li> </ol>	

	<p>3. Ideally, if service roads are required inside the watercourses, coarse gravel should be used as the infill. This material will not erode away after rainfall events and will provide a relatively solid foundation when surface water accumulates. Additionally, erosion will be limited by this material as opposed to exposed dirt roads.</p> <p>4. If dirt roads will be the means of access, these will have to be regularly checked for erosion. This should be done on a weekly to monthly basis and after short or long periods of heavy rainfall or after long periods of sustained rainfall.</p> <p>5. Sanitary facilities must be available for workers to use to prevent urine and faecal waste entering the surface water resources and the associated buffer zones.</p> <p><b>Erosion control</b></p> <p>6. Where erosion begins to take place, this must be dealt with immediately to prevent severe erosion damage to the wetlands. Should severe erosion occur, a rehabilitation plan will be required and Input from a suitably qualified wetland or aquatic specialist must be obtained.</p>
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#### 2.4.7 Health and Safety

Table 32: Health and Safety

IMPACT	HEALTH AND SAFETY This section deals with the issues relating to health and safety during operation	RESPONSIBILITY
PHASE	OPERATION	Developer
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>		
<b>MITIGATION / METHOD STATEMENT</b>	<b>Emergency evacuation plan</b> 1. 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.	

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IMPACT	HEALTH AND SAFETY This section deals with the issues relating to health and safety during operation	RESPONSIBILITY
	<p><b>Maintenance</b></p> <p>2. The servitude is to be regularly maintained. A maintenance schedule must be drawn up and records of all maintenance kept.</p> <p><b>Storage and handling of hazardous waste</b></p> <p>3. A spill kit needs to be kept on site to address any unforeseen spillages.</p> <p>4. Transport of all hazardous substances must be in accordance with the relevant legislation.</p>	

2.4.8 Visual Impact

Table 33: Visual Impact

IMPACT	VISUAL IMPACT This section deals with the issues relating to visual impacts during operation	RESPONSIBILITY
PHASE	OPERATION	Developer
ENVIRONMENTAL MANAGEMENT PROGRAMME		
MITIGATION / METHOD STATEMENT	<p><i>Maintenance and lighting</i></p> <ol style="list-style-type: none"> <li>High standards of maintenance and management of the landscaping should be carried out in accordance with the best possible practice to ensure that the landscaping ensures that the power line blends in with the current visual environment, by enhancing natural features such as trees and vegetation as much as possible.</li> <li>The servitude and surrounds must be kept clean, tidy and well maintained to reduce negative visual impacts.</li> <li>Rehabilitation of surrounding areas must take place with indigenous species.</li> </ol>	

IMPACT	VISUAL IMPACT This section deals with the issues relating to visual impacts during operation	RESPONSIBILITY
	4. Regular maintenance of the associated infrastructure must be undertaken.	Y

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## 2.5 Decommissioning phase

Mitigation measures implemented during construction with regards to the construction camp and equipment will remain the same for the decommissioning phase when a construction camp will need to be established again.

### 2.5.1 Ongoing Stakeholder involvement

This is the process that is recommended if the substations sites are decommissioned.

Table 34: Ongoing Stakeholder involvement

IMPACT PHASE	ONGOING STAKEHOLDER INVOLVEMENT This section relates to the stakeholder involvement that needs occur during decommissioning	RESPONSIBILITY
ENVIRONMENTAL MANAGEMENT PROGRAMME		ESKOM
MITIGATION / METHOD STATEMENT	<ol style="list-style-type: none"> <li>1. Community to be notified, as culturally appropriate, timeously of the planned decommissioning, e.g.: <ul style="list-style-type: none"> <li>• Proposed decommissioning start date; and</li> <li>• Process to be followed.</li> </ul> </li> <li>2. Recommend that a meeting with community leader(s) be held before decommissioning commence to inform them: <ul style="list-style-type: none"> <li>• What activities will take place during the decommissioning phase.</li> <li>• How these activities will impact upon the communities and/or their properties.</li> <li>• Regarding the timeframes of scheduled activities</li> </ul> </li> <li>3. Regular interaction between Eskom and community leader(s) during the decommissioning phase</li> <li>4. A reporting office / channel to be established should community members experience problems with contractors / sub-contractors during the decommissioning phase.</li> </ol>	

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	5. A register to be kept of problems reported by community members and the steps taken to address / resolve it.
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### 2.5.2 Community health and safety

Table 35: Community health and safety

IMPACT	COMMUNITY HEALTH AND SAFETY This section deals with the issues relating to health and safety during decommissioning	RESPONSIBILITY
PHASE	DECOMMISSIONING	ELO
ENVIRONMENTAL MANAGEMENT PROGRAMME		
MITIGATION / METHOD STATEMENT	<ol style="list-style-type: none"> <li>1. Demarcated routes to be established to ensure the safety of communities, especially in terms of road safety and communities to be informed of these demarcated routes.</li> <li>2. Excavated areas to be fenced off and regularly inspected to ensure that humans and animals do not have access to the site.</li> <li>3. Any infrastructure that would not be decommissioned, must be appropriately locked and/or fenced off to ensure that it does not pose any danger to the community.</li> </ol>	

### 2.5.3 Waste Management

Table 36: Waste Management

IMPACT	WASTE MANAGEMENT This section deals with the issues relating to waste management during decommissioning	RESPONSIBILITY
PHASE	DECOMMISSIONING	ELO

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ENVIRONMENTAL MANAGEMENT PROGRAMME	
MITIGATION / METHOD STATEMENT	1. All contaminated soils to be removed from the property and to be disposed of as hazardous waste.

#### 2.5.4 Surface and Groundwater

Table 37: Surface and Groundwater

IMPACT	SURFACE AND GROUNDWATER This section deals with the issues relating to surface and groundwater during decommissioning	RESPONSIBILITY
PHASE	DECOMMISSIONING	ESKOM
ENVIRONMENTAL MANAGEMENT PROGRAMME		
MITIGATION / METHOD STATEMENT	<ol style="list-style-type: none"> <li>1. Remove of any historically contaminated soil as hazardous waste.</li> <li>2. Removal of all substances which can result in groundwater (or surface water) contamination.</li> <li>3. Re-vegetation of exposed soil surfaces to ensure no erosion in these areas.</li> <li>4. A site-specific post-construction wetland rehabilitation plan compiled by a suitably qualified wetland specialist will be required to rehabilitate and monitor the affected wetlands where construction impacts have been caused.</li> </ol>	

#### 2.5.5 Biodiversity

Table 38: Biodiversity

IMPACT	BIODIVERSITY This section deals with the issues relating to biodiversity during decommissioning	RESPONSIBILITY
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<b>PHASE</b>	<b>DECOMMISSIONING</b>
<b>ENVIRONMENTAL MANAGEMENT PROGRAMME</b>	
<b>MITIGATION / METHOD STATEMENT</b>	<ol style="list-style-type: none"> <li>1. Rehabilitation of exposed surfaces with indigenous species, preferably large trees.</li> <li>2. Adherence to surface and groundwater mitigation measures to prevent secondary impacts on biodiversity.</li> <li>3. Prevent expansion of the current footprint(s).</li> <li>4. Retain large trees to keep nesting and roosting habitat.</li> </ol>
<b>SITE SPECIFIC MITIGATION</b>	
	<p><b>Loss of habitat for red data / general species</b></p> <ol style="list-style-type: none"> <li>5. Maintain footprint strictly during decommissioning.</li> <li>6. Existing access roads must be used.</li> <li>7. All infrastructure must be removed from the site.</li> <li>8. A rehabilitation plan must be compiled by a qualified ecologist.</li> <li>9. Re-vegetation of affected areas must be made a priority to avoid erosion.</li> <li>10. Suitable storm water / wind controls must be put in place until rehabilitation is complete.</li> <li>11. Constant removal of alien invasive species in and around plant.</li> </ol> <p><b>Weed Control</b></p> <ol style="list-style-type: none"> <li>12. The contractor should be responsible for implementing a programme of weed control</li> <li>13. The spread of exotic species occurring throughout the site should be controlled.</li> <li>14. All exotic vegetation must be removed from the site (if present).</li> </ol>

2.5.6 Air Quality

Table 39: Air Pollution

IMPACT	AIR POLLUTION This section deals with the issues relating to air quality during decommissioning	RESPONSIBILITY
PHASE	DECOMMISSIONING	Y
ENVIRONMENTAL MANAGEMENT PROGRAMME		
MITIGATION / METHOD STATEMENT	1. Maintain equipment to reduce exhaust emissions.	

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### 3 CONCLUSION

The environmental and social impacts of the project were spread through the four project phases. There were both positive and some negative project impacts identified through the BA. The following section briefly describes some of the major impacts and the proposed mitigation measures within each of the project phases.

#### 3.1 Pre-Construction Phase

The first site activities before mobilization of equipment will be a survey, required for final design of the power line and substation. Walk downs by the faunal, floral, avifaunal, heritage and surface water specialists should be undertaken, and be used to inform the final tower locations prior to the finalisation of tower positions. The avifaunal walk down should identify the spans that will require mitigation devices to be installed, if required. In addition, a floral walk down should be undertaken in the flowering season once the tower positions have been pegged in order to identify any affected RDL floral species should be removed and rescued. Further detailed geotechnical investigations should be undertaken for each proposed power line prior to construction.

There could be negative impacts on land associated with the construction of camps (temporary loss) and storage of construction materials especially if such construction is carried out on agriculturally productive land. Expectations of improvement in livelihood among locals must be addressed through public participation. Construction contracts will include environmental monitoring and management procedures and requirements. These must be in place prior to the commencement of any construction activities.

#### 3.2 Construction Phase

This phase of the activity will have both positive and negative impacts. The positive impacts are some employment opportunities offered to the construction workers and any other labourer who will be hired to provide their services during the construction phase. The negative impacts would include wastes generated, accidents, health and safety, air, dust and noise pollution, vegetation clearance, soil erosion, socio-environmental issues, loss of trees, and compaction of soil. Most of the negative impacts are minor and temporary. To mitigating negative impacts, the contractor shall ensure that all staff have adequate protective clothing and are adequately trained. The whole range of mitigation measures are however, outlined in the EMPr in this regard.

### 3.3 Operational Phase

The proposed project will have minimal negative effects which mainly relate to loss of aesthetic value and habitat as well as nuisance to affected landowners.

### 3.4 Decommissioning Phase

As with any project, the facilities used in this project will have a lifespan after which they may no longer be cost effective to continue with operation or may degrade and become inoperable. At that time, the project would be decommissioned, and the existing equipment removed and most likely replaced. The mitigation measures highlighted in the construction phase will once again become applicable as the construction of new infrastructure would essentially be associated with similar activities and would likely result in similar impacts.

The disposal of materials from the decommissioned plant is not viewed as high risk. Much of the material would be recyclable (steel structures) or inert (insulators, concrete foundations, etc.). These materials would however, need to be disposed of at a formal waste disposal or recycling centre.

Based on the above information, it is unlikely that the project will have many adverse social and environmental impacts. Most adverse impacts will be of a temporary nature during the construction phase and can be managed to acceptable levels with implementation of the recommended mitigation measures for the project such that the overall benefits from the project will greatly outweigh the few adverse impacts. All the negative impacts will either be moderate or lesser in rating and could be easily mitigated. Generally, the proposed power line and substation will result in appreciable benefits to the people in the project area of influence and bring opportunities for development in the area.





## Annexure B

### MANAGEMENT OF SOILS: GUIDELINES

#### Topsoil

##### Source of topsoil

- Topsoil shall be stripped from all areas that are to be utilised during the construction period and where permanent structures and access is required. These areas will include temporary and permanent access roads, construction camps, and lay down areas. Topsoil shall be stripped after clearing of woody vegetation and before excavation or construction commences.
- The topsoil is regarded as the top 300mm of the soil profile irrespective of the fertility appearance, structure, agricultural potential, fertility and composition of the soil.

##### Topsoil stripping

- Soil shall be stripped to a minimum depth of 150mm and maximum depth of 300mm or to the depth of bedrock where soil is shallower than 300mm. Herbaceous vegetation, overlying grass and other fine organic matter shall not be removed from the stripped soil.
- No topsoil which has been stripped shall be buried or in any other way be rendered unsuitable for further use by mixing with spoil or by compaction using machinery.
- Topsoil shall preferably be stripped when it is in a dry condition in order to prevent compaction.

##### Topsoil stockpiling

- The Consulting Engineer or Environmental Control Officer shall stockpile stripped topsoil in areas, which have been approved. Soil stockpiles may take the form of windrows.
- To prevent erosion, material stockpiled for long periods (2 weeks) should be retained in a bermed area.
- Topsoil, mulch and subsoil stockpiles must be placed in higher-lying areas of the site, and must not be positioned within stormwater channels or areas of ponding.
- Topsoil stripped from different soil zones shall be stockpiled separately and clearly identified as such. Under no circumstances shall topsoil obtained from different soil zones be mixed.
- Soil stockpiles shall not be higher than 2m or stored for a period longer than one year. The slopes of soil stockpiles shall not be steeper than 1 vertical to 2.5 horizontal.
- No vehicles shall be allowed access onto the stockpiles after they have been placed. Topsoil stockpiles shall be clearly demarcated in order to prevent vehicle access and for later identification when required.
- Soil stockpiles must not become contaminated with oil, diesel, petrol, garbage or any other material, which may inhibit the later growth of vegetation in the soil.

- After topsoil removal has been completed, the Contractor shall apply soil conservation measures to the stockpiles where and as directed by the Consulting Engineer or Environmental Control Officer. This may include the use of erosion control fabric or grass seeding.

#### Topsoil replacement

- Topsoil shall be replaced to a minimum depth of 75mm over all areas where it has been stripped and over disused borrow pits, after construction in those areas has ceased. Topsoil placement shall follow as soon as construction in an area has ceased.
- All areas onto which topsoil is to be spread shall be graded to the approximate original landform with maximum slopes of 1:25 and shall be ripped prior to topsoil placement. The entire area shall be ripped parallel to the contours to a minimum depth of 300mm.
- Topsoil shall be placed in the same soil zone from which it had been stripped. However, if there is insufficient topsoil available from a particular soil zone to produce the minimum specified depth, topsoil may be brought from other soil zones at the approval of the Consulting Engineer or Environmental Control Officer.
- Where topsoil that has been stripped by the Contractor is insufficient to provide the minimum specified depth, the Contractor shall obtain suitable substitute material from other sources at no cost to the employer. The suitability of the substitute material shall be determined by means of soil analysis, which are acceptable to the Consulting Engineer or Environmental Control Officer.
- No vehicles shall be allowed access onto or through topsoil after it has been reinstated.
- After topsoil reinstatement is complete, cleared and stockpiled vegetative matter shall be spread randomly by hand over the top soiled area. The vegetative material must be replaced on the areas from where it has been removed.



## Annexure C

### EXAMPLE AUDIT CHECKLIST

NO	ISSUES	YES/NO	QUAL. SCALE 1- 5	COMMENTS
<b>PRE-CONSTRUCTION PHASE</b>				
<b>Pre Construction responsibilities</b>				
1	Has an independent Environmental Control Officer (ECO) been appointed to monitor compliance with the EMP?			
2	Is a copy of the EMP and EA stored on site for easy reference?			
3	Have all areas to be developed been clearly demarcated with danger tape or similar?			
4	Has the contractor signed that he has read and understands the EMP?			
5	Have the results of monthly audits been sent to DEA and kept on site?			
6	Have records of all environmental incidents been maintained and has a copy of these records been made available to DEA?			
7	Have suitable sites for the construction camp and storage areas been chosen and confirmed?			
8	Has all equipment been stored within the construction camp when not in use and have all oil changes take place within its confines?			
9	Have all required DWA permits been obtained before construction in the areas to which these permits are relevant?			
10	Has a local construction team with a suitable site manager been appointed?			
11	Has an Environmental Liaison Officer been appointed by the contractor?			
12	Have labourers been drawn from the local market?			
13	Have staff on site been trained in: implications of non compliance, environmental awareness, handling of equipment and general waste disposal on site?			
<b>CONSTRUCTION PHASE</b>				
<b>Site Clearing</b>				
1	Has all alien vegetation been cleared from the site?			
2	Has existing vegetation been retained where possible?			
3	Have herbicides only been used after a proper investigation and by a qualified technician?			
<b>Site Establishment</b>				
4	Have ablution facilities been installed prior to the workforce moving onto the site?			
5	Has the contractor informed all staff that they are to make use of the supplied ablution			

facilities?

**CONSTRUCTION TRAFFIC AND ACCESS**

**Objective: Prevention of impacts associated with access for construction traffic**

**Potential negative impact: Possible traffic obstruction and damage to surrounding road structure.**

1	Are construction routes clearly defined?			
2	Has delivery of equipment been undertaken with the minimum amount of trips?			
3	Is access of all construction and delivery vehicles controlled to avoid compaction and damage to topsoil?			
4	Have site deliveries been scheduled to avoid peak hour traffic, weekends and evenings?			
5	Have dust roads and exposed surfaces been damped down to reduce dust?			
6	Are the affected roads being maintained by the contractor?			
7	Are deliveries and construction traffic being strictly scheduled to ensure minimal impact on surrounding land / road users?			
8	Is all equipment on site regularly serviced and in good condition?			
9	Has servicing of equipment and vehicles been done off site?			
10	Have oil changes taken place on a concrete platform?			
11	Is there adequate signage warning road users and residents of construction traffic?			
12	Have soils that have been compacted by construction been deep ripped and re-graded to even running levels?			
13	Have the entry and exit points been strategically positioned to ensure little effect as possible on the traffic?			
14	Has construction traffic been routed along major arterial routes?			
15	Has upgrading of road infrastructure been done according to the traffic engineering report?			
16	Has all transported equipment been clearly labelled as to their potential hazards?			
17	Are all the required safety labelling on the used containers and trucks in place?			
18	Has the contractor ensured that all the necessary precautions against damage to the environment and injury to persons have been taken in case of an accident?			

**CONSTRUCTION CAMP**

1	Have construction materials, soil stockpiles, machinery and other equipments been stored in designated areas only?			
2	Have specific areas been designated for cement batching plant?			
3	Is there sufficient drainage for cement batching plants to ensure that soils do not become contaminated?			
4	In the construction camp clear of litter at all times?			

5	Have spillages within the construction camp been cleaned up immediately and disposed of in the hazardous skip bin for correct disposal?			
6	Are there no open fires within the camp and use of firewood from surrounding vegetation?			
7	Is no labour being housed within the construction camp?			
<b>BIOPHYSICAL ENVIRONMENT</b>				
<b>SOILS AND GEOLOGY</b>				
<b>Objective: Prevention of changes to original soil structure and fertility</b>				
<b>Potential negative impact: Changes to soil structure and fertility as a result of excavation and disturbances</b>				
1	Has a qualified engineer been appointed to plan and monitor all earthworks?			
2	Has the average depth of topsoil been determined before the start of bulk earthworks?			
3	Has the full depth of topsoil been stripped from areas affected by construction prior to the commencement of major earthworks?			
4	Has care been taken not to mix topsoil and subsoil during stripping?			
5	Has no soil stripping taken place within the site in areas of retained vegetation or areas where construction is not required?			
6	Have construction vehicles only been allowed to utilise existing tracks or pre-planned access routes?			
7	Have soil stockpiles been managed in order to prevent wind and water erosion of soil surfaces taken place?			
8	Where possible has vegetation been retained to avoid soil erosion?			
9	Is subsoil and overburden being stockpiled separately and when backfilling has taken place were they returned in the correct soil horizon order?			
10	Has the contractor removed any polluted topsoil and replaced it at his own expense with approved topsoil equal to Department of Agriculture approved topsoil specifications?			
11	Has the removed topsoil been transported to a licensed landfill site?			
12	Has topsoil and subsoil been protected from contamination?			
13	Is cement mixing taking place on plastic linings or impacted areas and have any spillages been contained?			
14	Is ready mixed concrete been utilised where possible?			
15	Are any fuel storage tanks being stored in a sealed bunded area with bund walls high enough to contain 110% of the total volume of the stored hazardous material?			
16	Has any above ground storage of fuel not exceeded 1000 cubic metres?			
17	Is fuel being stored away from soil stockpiles?			
18	Has contaminated soil been contained and			

	disposed of off site at a DWA approved landfill site?			
19	Have compacted soils been ripped and restored to even running levels and has topsoil been re-spread over landscaped areas?			
20	Has the area been re-vegetated upon completion of construction activities?			
21	Has the use of fertilisers been kept to a minimum with preference towards slow-release fertilisers?			
22	Has the use of herbicides and pesticides been carefully controlled wherever used and have environmentally friendly pEAucts been used?			
23	Has any servicing of construction vehicles been taking place off site?			
24	Has no liquid waste material of any nature been disposed of on the site?			
25	Has no washing of vehicles and machinery taken place on the site?			
26	Has blasting been carried out in accordance with legislation using optimal and not excessive quantities of explosives?			
27	Has blasting only taken place on calm days?			
28	Have all foundation excavations been inspected by the engineers prior to the placing of steel reinforcement or concrete in order to determine that the structure is being founded upon the correct material and also to detect whether any active layers have been exposed by the foundation excavation?			
29	Have temporary toilets been placed on the site and are these regularly serviced?			
30	Has the Concrete or Mortar batching plant been contained within a bunded area?			
31	Has concrete or Mortar mixing only taken place within designated areas?			
32	Have all earthworks and borrow pits been adequately controlled and managed?			
33	Has the suitability of the material to be used on site been confirmed by detailed laboratory testing?			
34	Have excavations been cut back or shored?			
35	Has the development been sufficiently drained?			
36	Has accumulation of surface water on the perimeter of buildings prevented?			
37	Have down pipes been discharged into a lined or precast furrow?			
38	Have furrows discharged water onto surfaces which slope at least 1.5m away from the building?			
39	Has a sealed concrete apron been constructed around the building?			
40	Have leaks in water-bearing services been attended to immediately?			
41	Is the proximity of trees or shrubs planted adjacent to structures according to the landscape Architects specifications?			

<b>EROSION CONTROL</b>				
<b>Objective: Prevention of potential erosion by the proposed development.</b>				
1	Have silt fences and sand bags been implemented in areas susceptible to erosion?			
2	Have other erosion control measures such as:- brush packing with cleared vegetation; mulch or chip packing; vegetation planting and hydroseeding/hand sowing been implemented?			
3	Have sensitive areas been identified prior to construction so as to implement necessary precautions?			
4	Are all erosion control mechanisms being regularly maintained?			
5	Has there been seeding of topsoil and subsoil stockpiles to prevent wind and water erosion of soil surfaces?			
6	Has there been retention of vegetation to avoid soil erosion?			
7	Has vegetation clearance been phased to minimise soil erosion?			
8	Has re-vegetation of disturbed surfaces taken place once construction activities have ended?			
<b>GROUNDWATER, SURFACE WATER AND STORMWATER POLLUTION</b>				
<b>Objective: Prohibit the pollution of water resources</b>				
<b>Potential negative impact: Pollution of water resources</b>				
1	Has the use and storage of materials, fuels and chemicals which could leak into the ground been strictly controlled?			
2	Has water usage, land use, waste management and on-site sanitation been managed to avoid impact site groundwater resources?			
3	Do facilities for the collection and disposal of waste on the site occur in sealed surfaces?			
4	Has infrastructure associated with sewage adequately designed to avoid underground leakages?			
5	Have adequate sanitary facilities and ablutions been provided for construction workers?			
6	Has the contractor ensured that the ratio of toilets to workers adheres to relevant legislation?			
7	Has vegetation clearance been phased to minimise soil erosion?			
8	Have any pollution incidents been reported to DWA within 24 hours of the incident?			
9	Has re-vegetation of disturbed surfaces taken place once construction activities have ended?			
10	Are staff trained in spillage clean up operations?			
11	Have food preparation areas and sealed refuse bins been provided?			
12	Has littering been adequately controlled on site?			
13	Have skip waste containers been maintained on site and have these been emptied regularly?			

14	Has a hazardous waste skip bin been placed on site?			
15	Are any hazardous materials storage tanks being stored in a sealed bunded area with bund walls high enough to contain 110% of the total volume of the stored hazardous material?			
16	Have any hazardous substances been stored at least 20m from any water bodies on site?			
17	Has the ELO ensured that potentially harmful materials are properly stored in a dry secure environment with a sealed floor and a means of preventing unauthorised entry?			
18	Is the site managed in order to prevent pollution of drains, downstream watercourses or groundwater, due to suspended solids, silt (silt fences) or chemical pollutants?			
19	Has machinery been maintained to avoid oil leaks?			
20	Have possible contaminants been stored safely to avoid spillage?			
21	Has there been no washing or servicing of vehicles on site unless in a properly designed and approved facility?			
22	Has construction work related to the rehabilitation of the channel occurred during winter months?			
23	Has temporary diversion of the flow of water within the tributary been instituted during channel rehabilitation?			

**WASTE MANAGEMENT AND SANITATION**

**Objective: Ensure correct waste management practices**

**Potential negative impacts: Pollution of surrounding areas from sewage or litter.**

1	Has any rubble on site been either used on site or been removed to an approved landfill?			
2	Is rubble being placed within skip bin for regular removal?			
3	Have refuse bins been placed at strategic positions to ensure that litter does not accumulate within the construction site?			
4	Is waste being separated and recycled?			
5	Has the contractor exercised strict care when disposing of construction waste?			
6	Has a housekeeping team been appointed to control litter and other waste on the site?			
7	Is waste disposal taking place in terms of Section 20 of the Environment Conservation Act (Act No. 73 of 1989).			
8	Have all staff been trained in recycling practices?			
9	Has no littering by the employees of the Contractor been allowed under any circumstances?			
10	Are skip waste containers being maintained on site?			
11	Are skip waste containers being covered and arrangements made for them to be collected regularly from the site?			
12	Have all workers been briefed on the impacts			

	of informal ablution activities?			
13	Has all hazardous waste been carefully stored and then disposed of off site at a DWA approved landfill site?			
14	Have contaminants been stored safely to avoid spillage?			
15	Is machinery being properly maintained to keep oil leaks in check?			
16	Has the Contractor installed mobile chemical toilets on the site if flush toilets are not available?			
17	Are ablution facilities within 200m from workplaces but not closer than 50m from any natural water bodies or boreholes?			
18	Are toilets being serviced daily?			
19	Is potable water being provided for all construction staff?			
20	Is contaminated soil being excavated or treated on-site?			
21	Have Environmental Managers determined the precise method of treatment of polluted soil?			
22	In case a spill has occurred on an impermeable surface such as cement or concrete, has the surface spill been contained using oil absorbent pads?			
23	Have oil absorbent sheets or pads been attached to leaky machinery or infrastructure?			
24	Have materials used for the remediation of petrochemical spills been used according to pEAuct specifications and guidance for use?			
25	Have contaminated remediation materials been carefully removed from the area of the spill so as to prevent further release of petrochemicals to the environment?			
26	Have these materials been stored in adequate containers until appropriate disposal?			
<b>HYDROLOGY AND STORMWATER</b>				
1	Has the site been managed to prevent pollution of drains, downstream watercourses or groundwater, due to suspended solids, silt or chemical pollutants?			
2	Have silt fences been used to prevent any soil entering the stormwater drains, insofar as possible?			
3	Has there been promotion of a water saving mind set with construction workers in order to ensure less water wastage?			
4	Has a new stormwater construction been developed strictly according to specifications from engineers in order to ensure efficiency?			
5	Have hazardous substances been stored at least 20m from any water bodies on site to avoid pollution?			
6	Has the installation of the stormwater system taken place as soon as possible to attenuate stormwater from the construction phase as well as the operation phase?			
7	Have Grids / Litter traps been placed at the			

	entry point to drains and cleaned on a regular basis?			
8	Has rehabilitation of the channel of the Natalspruit tributary been undertaken according to the stipulations of the channel rehabilitation and maintenance plan?			
9	Does construction work related to the rehabilitation of the channel occur during the winter months when flows within the channel are at their lowest and the risk of rainfall-related flow spate flows at their lowest?			
10	Has temporary diversion of the flow of water within the tributary been instituted during channel rehabilitation to ensure that excess siltation from earthworks or any other pollutants do not enter the downstream stretches of the river?			
<b>AIR POLLUTION</b>				
<b>Objective: Prevention of air pollution due to dust and odours</b>				
<b>Potential negative impacts: Air pollution due to dust and odours</b>				
1	Is vegetation being retained where possible to reduce dust travel?			
2	Have all exposed soil surfaces damped down with a water bowser or sprinklers when necessary to reduce dust?			
3	Has the contractor controlled dust on site to ensure that no nuisance is caused?			
4	Is the site speed limit of 30km/h not being exceeded?			
5	Have any complaints or claims emanating from the lack of dust control been attended to immediately by the Contractor?			
6	Are excavations taking place during agreed working times and permitting weather conditions to avoid drifting of sand into neighbouring areas?			
7	Has the contractor commenced rehabilitation of exposed soil surfaces as soon as practical after completion of earthworks?			
8	Is wet suppression, hygroscopic material or organic / synthetic soil stabilisers being used to control dust?			
9	Are construction vehicles being regularly serviced in order to limit gaseous emissions (off site)?			
10	Are toilets on site being serviced regularly to avoid potential odours?			
11	Have no open fires been noted on site?			
12	Are the roads at the entry and exit points being cleared regularly?			
13	Are soil loads which are being delivered being covered to reduce dust?			
14	Have the number of construction vehicles been kept to the minimum to ensure dust generation?			
15	If blasting is required, has it been carried out in accordance with legislation using optimal and not excessive quantities of explosives?			



16	Has blasting only taken place on calms days to reduce dust?			
17	Has the contractor ensured that any grass left in a natural state during construction has been cut in order to prevent veld fires, especially during the dry months?			
18	Does the contractor have operational fire-fighting equipment available on site, especially during the winter months?			
<b>FLORA</b>				
<b>Objective: Ensure conservation of flora</b>				
<b>Potential negative impacts: Reduction of biodiversity as a result of development</b>				
1	Is there containment of construction activities to the boundaries of the construction area?			
2	Have the ecologically more sensitive areas of the site (the stream and one of the dams) been demarcated with danger tape or fencing and avoided during the construction phase, insofar as possible?			
3	Has the rehabilitation of the dam closest to the stream included the improvement (and diversification) of the aquatic and riparian habitat in the area?			
4	Has this rehabilitation taken place during the construction phase?			
5	Has the capture and release of certain species taken place prior to destruction of Dam 2 and after the rehabilitation of Dam 1?			
6	Have these activities taken place during the winter months to avoid the breeding season?			
7	Has the footprint of construction been contained to ensure surrounding areas that are not to be developed are retained for indigenous species that may be present?			
8	Has all exotic vegetation been removed from site in a phased manner in order to avoid soil erosion?			
9	Has vegetation only been removed as it has become necessary?			
10	Have no materials been prematurely delivered to the site which could result in additional areas being cleared?			
11	Has the construction camp been located in the position that was planned?			
12	Has the contractor implemented a weed control programme for the emergence of weeds during construction?			
13	Has no vegetation been used for firewood?			
14	Have areas that have been impacted on and that are not part of the site been rehabilitated?			
15	Has the spread of exotic species occurring throughout the site been controlled?			
16	Has a mixture of vegetation seed been used?			
17	Has a vegetation specialist been consulted?			
18	Have landscape areas been rehabilitated with locally indigenous species?			
19	Has the section of the tributary of the Natalspruit that is proposed to be rehabilitated			

	been fenced off and maintained as an exclusion area, and only used for limited low-impact recreational uses such as a walking trail or bird watching?			
20	Has a rehabilitation action plan been formulated for these areas?			
21	Has herbicide use only been allowed with the approval of the developer and according to contract specifications?			
22	Is the application according to set specifications and under supervision of a qualified technician?			
23	Have only environmentally friendly herbicides been used?			
24	Has there been containment of construction activities away from environmentally sensitive areas (dam and stream)?			
25	Has the stream been rehabilitated?			
26	Has the dam been rehabilitated?			
27	Have indigenous species been included in landscaped areas?			
28	Has the section of the tributary of the Natalspruit that is proposed to be rehabilitated been fenced off and maintained as an exclusion area, and only used for limited low-impact recreational uses such as a walking trail or bird watching?			
<b>FAUNA</b>				
<b>Objective: Ensure conservation of fauna</b>				
<b>Potential negative impacts: Reduction of biodiversity as a result of development</b>				
1	Has all capture or snaring of animals been strictly prohibited on site?			
2	Has anyone found engaged in this activity been disciplined or prosecuted?			
3	Has noise been kept to a minimum during construction?			
4	Have faunal species other than avi-fauna been translocated before the commencement of construction if required?			
5	Has the ELO been notified of any fauna that needs to be removed off site?			
6	Is the construction team aware of the potential occurrence of fauna on the site?			
7	Has the section of the tributary of the Natalspruit that is proposed to be rehabilitated been fenced off and maintained as an exclusion area, and only used for limited low-impact recreational uses such as a walking trail or birdwatching?			
<b>SOCIO ECONOMIC ENVIRONMENT</b>				
<b>EMPLOYMENT</b>				
<b>Objective: Maximise employment opportunities for local labour.</b>				
<b>Potential positive impact: Job training and a decrease in local unemployment</b>				
1	Have labour intensive construction measures been used where appropriate?			
2	Has the training of labour taken place on site to benefit individuals beyond the project?			
3	Has labour been sourced from the local			

	community where possible?			
4	Has recruitment of labour been done in and at a properly managed location or facility which avoids disturbance to the public, traffic and construction activities?			
5	Have local suppliers been used where possible?			
6	Has the contractor ensured that all staff working on the proposed project are in possession of a South African Identity Document or valid work permit?			
<b>SAFETY, SECURITY, RISK AND HAZARD</b>				
<b>Objective: Minimise risk of injury to construction workers and the public.</b>				
<b>Potential Negative Impact: Injury to construction workers and the public</b>				
1	Has the implementation of safety measures, work procedures and first aid been implemented on site?			
2	Has a health and safety plan in terms of the Occupational Health and Safety Act (Act No. 85 of 1993) been drawn up to ensure worker safety?			
3	Have adequate warning signs been erected to indicate hazardous working areas?			
4	Have excavations been clearly demarcated?			
5	Have workers been thoroughly trained in using potentially dangerous equipment?			
6	Has the contractor ensured that all equipment is in a safe operating condition?			
7	Has a safety officer been appointed?			
8	Are regular Health and Safety Audits being conducted?			
9	Are all construction workers well educated about HIV/ AIDS and the risks surrounding this disease?			
10	Has a Personal Protective Equipment (PPE) been made available to all construction staff?			
11	Are hard hats and safety shoes being worn at all times?			
12	Has no person entered the site without the necessary PPE?			
13	Is handling, storage and disposal of hazardous waste being done in accordance with the requirements of the Occupational Health and Safety Act?			
14	Have no workers been dismissed for declining to work in an unsafe environment?			
15	Is sufficient fire fighting equipment present on the site?			
16	Has the site been fenced for the duration of construction?			
17	Is access to the site strictly controlled?			
18	Is there 24 hour security in site?			
19	Have emergency numbers for local police and fire department etc been placed in a prominent area?			
20	Have fire fighting equipment must be placed in prominent positions across the site where it is easily accessible?			

21	Are all equipment used for construction, including drills, TLB's in good working order with up to date maintenance records?			
22	Have reputable contractors with loyal staff been appointed?			
23	Has job seeking been discouraged at the site through the use of signs etc?			
24	Have no shebeens been allowed to operate on the site?			
25	Have no informal traders been allowed on or near the site?			
26	Has all equipment been locked up and supervised at all times?			
27	Is labour being transported to the site to discourage loitering in adjacent areas and a possible increase in crime or disturbance?			
28	Have unsocial activities such as unauthorised consumption of alcohol or illegal selling of alcohol, drug utilisation or prostitution been banned?			
29	Has no labour been housed on site?			
30	Has staff that will be handling hazardous materials been trained to do so?			
31	Have any hazardous materials (apart from fuel) been stored within a lockable store with a sealed floor?			
32	Have all storage tanks containing hazardous materials been placed in bunded containment areas with sealed surfaces?			
33	Are the bund walls high enough to contain 110% of the total volume of the stored hazardous material?			
34	Are Material Safety Data Sheets (MSDS) which contain the necessary information pertaining to a specific hazardous substance present for all hazardous materials stored on the site?			
35	Have petrochemical spill been reported to the Project Manager and ECO?			
36	Has the problem been assessed and the necessary actions required undertaken?			
37	Has the immediate response been to contain the spill?			
38	Has the source of the spill been identified, controlled, treated or removed wherever possible?			
39	Has construction staff been trained in fire hazard control and fire fighting techniques?			
40	Are all flammable substances stored in dry areas which do not pose an ignition risk to the said substances?			
41	Has all contact with the affected parties been courteous?			
42	Have the rights of the affected parties being respected at all times?			
43	Have all existing private access roads used for construction purposes, been maintained at all times to ensure that the local people have free			

	access to and from their properties, except in exceptional circumstances and under guidance of the ECO?			
44	Have speed limits been enforced in such areas and all drivers sensitised to this effect?			
<b>NOISE</b>				
<b>Objective: Minimisation of noise pollution</b>				
<b>Potential negative impact: Excessive noise associated with construction</b>				
1	Are the relevant noise regulations being adhered to and is noise being limited to during the day only to reduce disturbance of residential areas?			
2	Have construction site yards, workshops, concrete batching plants and other noisy fixed facilities been located well away from noise sensitive areas?			
3	Where possible, has truck traffic been routed away from noise sensitive areas?			
4	Is machinery on site in good working condition?			
5	Has noisy machinery been fitted with silencers?			
6	Where possible, have noisy activities been combined so that they occur at the same time?			
7	Have blasting operations been strictly controlled with regards to the size of explosive charge in order to minimise noise and air blast?			
8	Have the number of blasts been limited and been undertaken at the same time each day with no blasting at night?			
9	Have construction activities been contained to reasonable hours during the day and early evening?			
10	Has the contractor liaised with the surrounding community regarding ways to minimise impacts and have they been kept informed of any noisy activities (particularly blasting)?			
11	Is the database from the EIA and subsequent surveys being kept on site?			
12	If complaints have been received regarding noise, has the contractor liaised with the local residents on how best to minimise the noise impact and has he kept them informed of intended activities?			
13	Have noisy activities only taken place during allocated construction hours as per Section 25 of the Noise Control regulations of the Environment Conservation Act?			
14	Do the working conditions on site comply with the requirements of the Occupational Health and Safety Act (Act No. 85 of 1993).			
15	Has noise from labourers been controlled?			
16	Have noise suppression measures been applied to all construction equipment and has all construction equipment been kept in good working order? If any vehicles have not complied with this, have they been removed			

	from the site?			
17	Have labourers been discouraged from loitering in the area and causing noise disturbance?			
18	Has the relevant PPE equipment been made available to the construction team?			
19	Are SANS 10103 and the Gauteng Noise Control Regulations being used as the main guidelines for addressing the potential noise impact on this project?			
20	Don't ambient noise levels not exceed the acceptable standards for a suburban residential district or at most the levels for an urban residential district, namely 55dBA during the day and 45dBA during the night, except in exceptional circumstances?			
<b>VISUAL ENVIRONMENT</b>				
<b>VISUAL IMPACT</b>				
<b>Objective: Minimise visual impacts from adjacent areas and roads.</b>				
<b>Potential Negative Impact.: Visual impact on adjacent areas</b>				
1	Have the stands of exotic vegetation on the south western and north eastern boundaries of the site been maintained for the duration of the construction phase to reduce the visual impact to immediately surroundings areas?			
2	Have landscaping and tree planting been used to soften the impact?			
3	Has the site been fenced to aid in reducing the visual impact of construction?			
4	Have construction activities on site been clustered?			
5	Has the construction site been screened with shade cloth where necessary?			
6	Have stockpiles been managed to be below 4m in height and prevent the spread of weeds to reduce visual impact?			
7	Is unwanted material and litter being regularly removed from site?			
8	Has the construction site been cordoned off with shade-cloth or other material?			
9	Is lighting subtle and does not disturb passing motorists and surrounding residents?			
10	Has indigenous vegetation been planted once construction is complete to shield the site from surrounding road and land users?			
11	Is there no strobe or any other form of flashing signs outside the development which could be visible from surrounding areas?			
12	Has the site been kept visually and aesthetically pleasing, especially in and around the construction camp?			
13	Is the general architectural design cognisant of the surrounding land owners?			
14	Is this design kept with the context of the area?			
<b>CULTURAL ENVIRONMENT</b>				
<b>Archaeological Artefacts</b>				
<b>Objective: Identify, examine and preserve archaeological sites</b>				

Potential negative impact: Destruction of archaeological sites.				
1	If any archaeological finds have been discovered, have they been reported to the nearest National Monuments office, SAHRA and to DEA?			
2	Have local museums as well as the South African Heritage Resource Agency (SAHRA) been informed if any artefacts have been uncovered in the affected area?			
3	Have no artefacts been removed from the site?			
4	Has construction, in the event of an archaeological find, been halted until further instruction from a qualified archaeologist?			
5	Has the contractor ensured that all his staff are aware of the necessity if reporting any possible historical or archaeological finds to the ELO?			
6	Has any destruction of a site only occurred once a permit has been obtained and the site has been mapped and noted?			
7	Have permits been obtained from the South African Heritage Resources Association (SAHRA) in case the proposed site affects any world heritage sites or if any heritage sites are to be destroyed or altered?			
8	In case any archaeological sites have been uncovered during construction, have their existence been reported to the developer immediately?			
9	Has there been documentation of significant heritage features (those older than 60 years) that will be demolished, and disposal of re-usable building materials to a recognised building restoration contractor, if not utilised by the developers?			
10	Have all other buildings and structures (those younger than 60 years) been documented by means of photos?			
11	Has the fittings and furnishings of the original Rand Sporting Club clubhouse been preserved by relocating such fittings and fixtures in so far as possible inside a piazza or similar facility (such as a restaurant or pub) in the proposed development in order to retain something of the tangible and also intangible heritage of the site?			
12	Has the Hennenman Memorial been preserved in a proposed piazza (or similar facility) with a horseracing theme?			
13	Have the secondary grandstand (photos) been documented?			
14	Have the tangible and intangible heritage (theme) been preserved through the conservation of historical signage, the naming of areas and the display of historic and recent photos and other images depicting horseracing at Newmarket as part of a themed			

	piazza inside the proposed development?			
15	Is there a Heritage Conservation Management Plan for ensuring the preservation of identified heritage features during and after construction?			
<b>DEGREE OF COMPLIANCE FOR RELEVANT POINTS</b>				



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