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ENVIRONMENTAL MANAGEMENT PLAN

(EMP)

for the

management of activities relating to the protection of the natural environment during the construction- and maintenance phases

relating to the

CONCORDIA & CAROLUSBERG

BULK WATER SUPPLY UPGRADES

THE PROPOSED NAMAQUALAND REGIONAL WATER SUPPLY SCHEME (NRWSS) HIGH PRIORITY BULK WATER SUPPLY PIPELINE AND ASSOCIATED INFRASTRUCTURE UPGRADES

NAMA KHOI MUNICIPALITY, NORTHERN CAPE PROVINCE

12 JULY 2016

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1. INTRODUCTION

Sedibeng Water Board is a bulk supplier of water to the Nama Khoi Municipal jurisdiction area. The communities that are served are Steinkopf, Okiep, Concordia, Nababeep, Bulletrap, Carolusberg, Springbok and Kleinzee with an estimate population of ±50 000. The Namakwa water scheme was constructed during the 1970's and involves extraction from the Orange River near Henkries mond, purification works at Henkries a booster pump station at Doringwater and round about 130 km's of pipeline to Springbok. The water is pumped from Henkries to Eenrietberg Reservoir from where it gravitates to the Okiep Reservoir (this pipeline is currently being refurbished and/or upgraded). All of the current pipelines have been in use well over its design period and needs to be replaced as a matter of urgency. As a result of age and weathering the pipelines are subject to ever increasing breakages, resulting in water losses, and inconsistent water supply, leaving various communities and towns without potable water on an increasing frequency.

Both the towns of Concordia and Carolusberg are supplied with freshwater from the Namaqualand Regional Water Supply Scheme (NRWSS), managed by Sedibeng Water. Both the Concordia and Carolusberg pipelines are in poor shape of repair and do not have the long term capacity to service these towns (please note that this is two separate water pipelines. As part of the larger NRWSS upgrade (currently replacing the main supply pipeline from the Orange River Raw water Pumpstation to Okiep Reservoir and Nababeep) the Sedibeng Water Board considers the upgrade of the Concordia and Carolusberg bulk water supply lines as the next highest priority infrastructure upgrade. There is no other sources of potable water are locally available it means that the current pipelines need to be in operation while the replacement is done.

In terms of the Concordia upgrade the new pipeline will be placed next to the old pipeline (so that the original pipeline can maintain water supply during construction). The new pipeline will be placed above ground within the rocky sections (which will reduce the construction disturbance footprint in these areas significantly) and below ground in sandy sections. In terms of the Carolusberg upgrade water is presently pumped from the Okiep Reservoir "over" the mountains (the shortest route) to Carolusberg. Because the water has to be pumped from Okiep over the mountains the operational cost is ever increasing (rise in cost of electricity and difficult access). The proposed preferred new route option entails linking the Carolusberg pipeline to the Concordia pipeline (tapping water from the Concordia pipeline) and routing it around the mountains to the south of Concordia up to Carolusberg. This will reduce pumping costs and thus operational costs significantly. The terrain is also much easier to access, with existing roads, which will in term reduce maintenance costs.

Because of the enormous additional cost implications, the applicant proposes that the old underground pipelines sections will only be removed where it is necessary for construction purposes. However, all absolute aboveground structures will be removed.

1.1 PURPOSE OF THE EMP

The purpose of this Environmental Management Plan or Programme (EMP) is to give direction and guidance to all responsible parties, and binds all contractors, sub-contractors and other persons working on the site to adhere to the terms and conditions of the EMP during the construction and operational phase of the project. Additional "Site Specific" conditions may be agreed upon during the "On Site Start-Up Meeting" (Appendix 2).

The overall aim of the EMP is to prevent avoidable damage and/or minimise or mitigate unavoidable environmental damage associated with the construction, and to a lesser degree the operational, phases of the proposed project.

The EMP forms part of the contractual obligations to which all contractors/employees involved in construction, maintenance, or demolition work must be committed. It serves as a guideline and baseline information document for the construction, operational and decommissioning phases of the proposed project and aims to comply with Section 24N of the National Environmental Management Act (Act no 107 of 1998) (NEMA), as well as the Environmental Impact Assessment (EIA) Regulations and any additional specific information requested by any State Department, including the Department of Environmental Affairs (DEA) for specific projects.

This EMP:

- identifies project activities that could cause environmental damage (risks) and provides a summary of actions required;
- identifies persons responsible for ensuring compliance with the EMP;
- provides standard procedures to avoid and/or minimise the identified negative environmental impacts and to enhance the positive impact of the project on the environment;
- provides site and project specific rules and actions required, through the start-up report;
- forms a written record of procedures, responsibilities, requirements and rules for Contractor(s), their staff and any other person who must comply with the EMP;
- provides for monitoring of compliance and record keeping.

The EMP is partly prescriptive (identifying specific people or organisations to undertake specific tasks, in order to ensure that impacts on the environment are minimised), but it is also an open-ended document in that information gained during the construction activities and/or monitoring of procedures on site could lead to changes in the EMP.

1.2 SCOPE

This EMP addresses the construction- and operational phases and all activities associated with this project. Compliance to the EMP shall be monitored by an independent Environmental Control Officer (ECO) who will visit the site on a regular basis during the construction phase (at least monthly).

The Applicant or someone appointed by the applicant will be responsible to ensure the implementation of the requirements of this EMP by all contractors and sub-contractors.

2. DEFINITIONS AND ABBREVIATIONS:

2.1 DEFINITIONS

Applicant: the person or responsible person from an organization who applied for the proposed activity described in the ROD.

Audit (Site Completion): environmental evaluation (audit) of compliance of the construction phase to the conditions of the EMP.

Bund: enclosure under / around a storage facility to contain spillage.

Batch plant: a concrete or plaster mixing facility and associated equipment and materials.

Construction: means the construction period of the project during which the actual works are carried out, deemed to include site establishment, site preparation, the works, maintenance period and decommissioning and is defined as from commencement of site establishment until site handover (practical completion).

Construction site: means the area influenced and affected by the construction activities or under the control of the Contractor often referred to as "the Site".

Construction Supervisor: The person responsible (appointed by the applicant) to ensure that the construction is carried out to completion on time, within budged and that the Contractor fulfils his obligations in terms of the EMP.

Contaminated water: means water contaminated by the Contractor's activities, *e.g.* concrete water and runoff from plant/ personnel wash areas.

Contractor: the principal persons / company and all other sub-contractors involved in the construction of the project.

Contractor's camp: means the designated and suitably demarcated areas on the Site within which all site offices and staff facilities are situated and within which equipment will be stored, for instance, borrow areas, batching plant, crusher plant, sand washing plant, workshop, offices, rest areas, ablution areas, etc., whichever is applicable.

Declaration of understanding: Form that is signed by all contractors involved in the construction works of their understanding and acceptance of the EMP and site-specific additions to the EMP.

Development site: boundary and extent of development works and infrastructure.

Environment: means 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 part of the combination of the above two bullets and the interrelationships between them;
- the physical, chemical, aesthetic and cultural properties and conditions of the foregoing that influence human health and well-being

Environmental Aspect: Any element of any construction activity, product or services that can interact with the environment.

Environmental Audit Report: report done by the ECO and submitted by the Applicant to the satisfaction of the Chief Directorate Environmental Affairs, within six months after construction has been completed and also after the site(s) has been rehabilitated.

Environmental Control Officer: The ECO must be independent and suitably qualified (a diploma or degree in environmental management with at least 5 or more years of environmental site management

experience) and must have a sound knowledge of the environment in which the activity will take place.

Environmental Completion Statement: A report by the ECO to the relevant authorities stating completion of the project and compliance with the EMP and its conditions.

Environmental Impact: Any change to the environment, whether adverse or beneficial, wholly or partially resulting from any construction activity, product or services.

Method statement: A statement by the Contractor, describing the scope of intended construction works step-by-step, in order for the ECO and Construction Supervisor to understand the Contractors intentions and be able to comment on, so that they could assist with devising mitigating measures should it be necessary to avoid environmental impact.

No-Go Area(s): An area of such (environmental/aesthetical) importance that no person or activity are allowed within a designated boundary surrounding this area.

Stop Works Order: An order which can be issued either by the ECO or Construction Supervisor to the Contractor (or any sub-contractor) if serious environmental damage is about to happen or is happening as a result of construction activities. On receiving such an order the Contractor must immediately stop all activities (or planned activities) relevant to the specific issue until an environmentally friendly resolution has been approved by the ECO.

Site meetings: Periodic (weekly or monthly) meetings between the ECO, Construction Supervisor and Contractor to discuss construction activities that relate to the environment or any other environmental issues that might arise.

Works: The works to be executed in accordance with a contract.

On-site start-up meeting: a start-up meeting held on site, before any construction has begun to discuss EMP and determine site specific additions that will be included as the basis for the EMP.

Potentially hazardous substance: is a substance, which, in the reasonable opinion of the Engineer, can have a deleterious (detrimental) effect on the environment.

Precautionary principle: means the basic principle, that when in doubt or having insufficient or unreliable information on which to base a decision, to then undertake actions that will have minimum risk.

Reasonable: means unless the context indicates otherwise, reasonable in the opinion of the Engineer/Project Leader after he has consulted with a person, not an employee of the applicant, suitably experienced in "environmental implementation plans" and "environmental management plans", both as defined in the Environmental Management Act (Act No 107, 1998).

Solid waste: means all solid waste, including construction debris, chemical waste, excess cement/concrete, wrapping materials, timber, tins and cans, drums, wire, nails, food and domestic waste (e.g. plastic packets and wrappers).

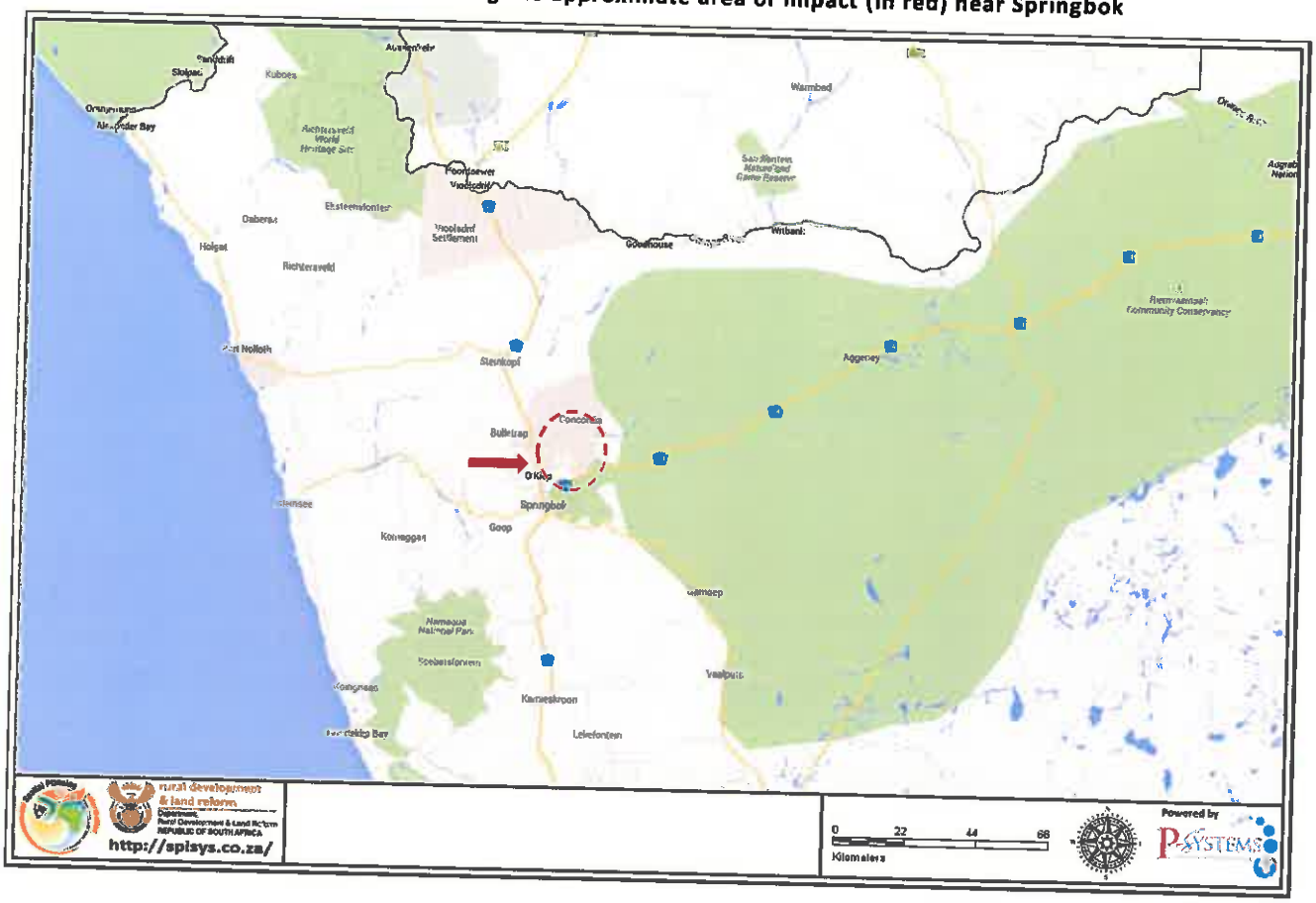
2.2 ABBREVIATIONS

CARA	Conservation of Agricultural Resources Act no. 43 of 1983
DEA	Department Environmental Affairs
DEA&DP	Department of Environmental and Nature Conservation
DTEC	Department of Tourism, Environment And Conservation [Western Cape Province]
EA	Environmental Authorization (Record Of Decision) issued by relevant authority for the authorisation to commence construction under certain environmental compliances
EAP	Environmental Assessment Practitioner
ECO	Environmental Control Officer - Must be a suitably qualified independent environmental consultant appointed to ensure compliance to the EMP
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan or Programme
ER	Engineers representative or Main contractors representative
ESO	Environmental Site Officer - . Must be a person with adequate environmental knowledge to understand and implement the EMP by conducting onsite inspections determined by the ECO and the applicant.
HWC	Heritage Western Cape
MSDS	Material Safety Data Sheet(s)
NCNCA	Northern Cape Nature Conservation Act 9 of 2009.
NEMA	National Environmental Management Act no. 107 of 1998.
NEM:AQA	National Environmental Management: Air Quality Act 39 of 2004.
NEM:BA	National Environmental Management: Biodiversity Act 10 of 2004.
NEM:PAA	National Environmental Management: Protected Areas Act 57 of 2003
NEM:WA	National Environmental Management: Waste Act 59 of 2008.
NFA	National Forest Act 84 of 1998.
NHRA	National Heritage Resources Act 25 of 1999.
NVFFA	National Veld and Forest Fire Act 101 of 1998.
NWA	National Water Act 36 of 1998
OSSM	On-site Start-up Meeting
ROD	Record of Decision
SAHRA	South African Heritage Resources Agency

3. PROJECT LOCATION & DESCRIPTION

Concordia and Carolusberg are two small mining towns in close vicinity to Springbok (the principle town of the Namaqualand) and Okiep in the Northern Cape Province, Namakwa District Municipality, and Nama Khoi Local Municipality. Okiep is located just (approximately 10 km) north of Springbok, just off the N7 going north (Refer to Figure 1). Bulk water for both Concordia and Carolusberg are supplied from the Okiep Reservoir.

Figure 1: Overview of South Africa showing the approximate area of impact (in red) near Springbok



3.1 CONCORDIA UPGRADE

The Concordia pipeline upgrade entails the replacement of the existing pipeline with a new and larger pipeline (the Red line in Figure 2) in the same basic footprint (only one route alternative). The new pipeline will be:

- Approximately 8.2 km in length;
- With a maximum diameter of 0.35 m;
- It will pass through the urban edge of Okiep and Concordia (land owned by Nama Khoi Municipality) as well as land owned by the O'okiep Copper Company (OCC) and cross the Concordia commonage (owned by the Nama Khoi Municipality);
- It will cross a number of small seasonal streams / drainage lines within the same footprint as the original pipeline;
- It will cross natural veld (not listed in terms of NEMBA), within the existing servitude;
- It runs mostly parallel to the Okiep to Concordia tarred road, BUT NOT within the road reserve;

- The pipeline passes close to a type 2 CBA (as identified within the Namakwa Biodiversity Sector Plan) but is unlikely to interfere with any CBA;
- The new pipeline will be placed next to the old pipeline (so that the original pipeline can maintain water supply during construction);
- The new pipeline will be placed above ground within the rocky sections and below ground in sandy sections (in order to reduce construction cost as well as environmental impact);
- Placing the pipeline above ground will be more visual, but will result in a much reduced footprint and a very low physical disturbance.
- Because of the enormous additional cost implications, the applicant proposes that the original pipeline will only be removed where it is necessary for construction purposes. However, all absolute aboveground structures will be removed.
- Please note that large sections of the original pipeline are expected to still be asbestos or asbestos cement pipelines, which will need special handling and disposal (and which will increase the upgrade costs significantly).

Figure 2: A map showing the towns of Concordia and Carolusberg in relation to Okiep and the various route options

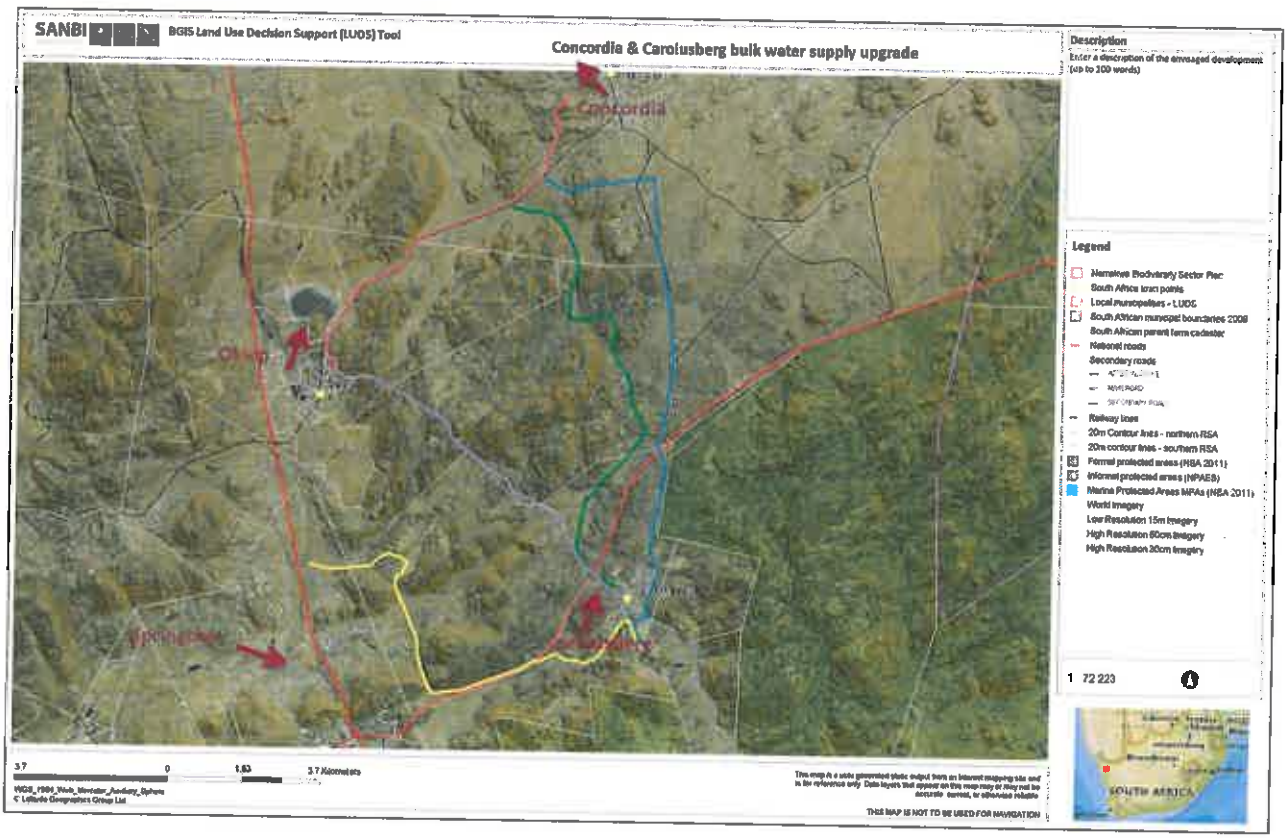
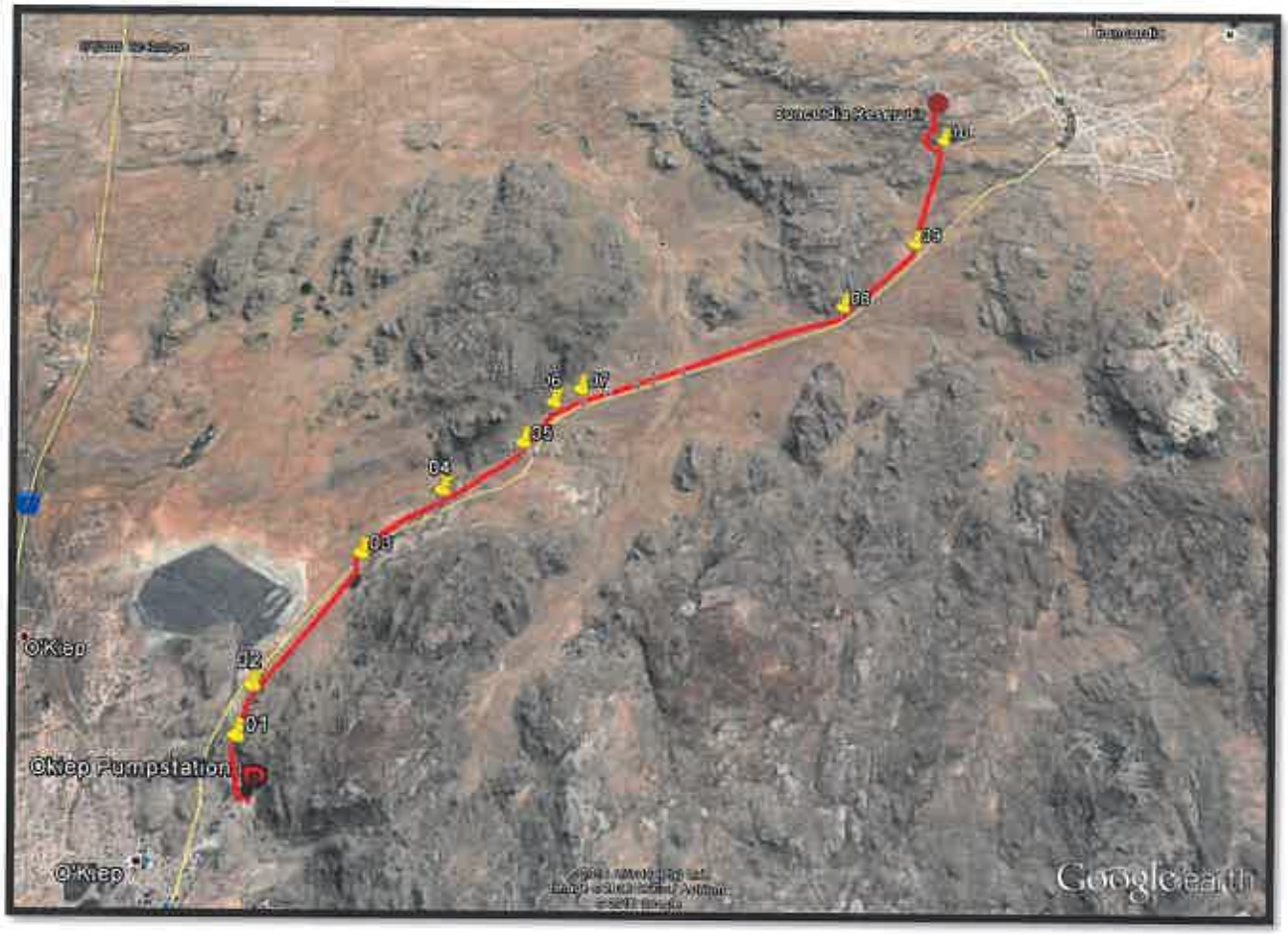


Table 1: Co-ordinates for the Concordia pipeline route as shown in Figure 3

ALTERNATIVE:	LATITUDE (S):	LONGITUDE (E):
• Starting point (Okiep Reservoir)	29°35'33.52"S	17°53'13.06"E
• Point 01 Okiep	29°35'23.68"S	17°53'6.05"E
• Point 02 Okiep	29°35'11.71"S	17°53'9.66"E
• Point 03 Road crossing	29°34'46.26"S	17°53'27.89"E
• Point 04 Entering CBA	29°34'30.71"SS	17°53'45.43"E

ALTERNATIVE:	LATITUDE (S):	LONGITUDE (E):
• Point 05 CBA area	29°34'19.75"S	17°54'4.86"E
• Point 06 Exiting CBA	29°34'8.95"S	17°54'11.89"E
• Point 07	29°34'5.03"S	17°54'18.68"E
• Point 08	29°33'40.67"S	17°55'29.20"
• Point 09	29°33'21.06"S	17°55'51.46"E
• Point 10 Rocky section	29°32'47.92"S	17°56'3.92"E
• End point (Concordia Reservoir)	29°32'33.77"S	17°56'4.98"E

Figure 3: Google image showing the pipeline route from Okiep to Concordia reservoir



3.2 CAROLUSBERG UPGRADE

In terms of the Carolusberg upgrade water is presently pumped from the Okiep Reservoir "over" the mountains (the shortest route) to Carolusberg (the purple line in Figure 2). Because the water has to be pumped from Okiep over the mountains the operational cost is ever increasing (rise in cost of electricity and difficult access).

The proposed preferred new route option (blue line in Figure 2 and Figure 3) entails linking the Carolusberg pipeline to the Concordia pipeline (tapping water from the Concordia pipeline) and routing it around the mountains to the south of Concordia up to Carolusberg. This will reduce pumping costs and thus operational

costs significantly. The terrain is also much easier to access, with existing roads, which will in term reduce maintenance costs.

Figure 4: Google image showing the Concordia pipeline (Red) and the preferred Carolusberg route option (Blue)

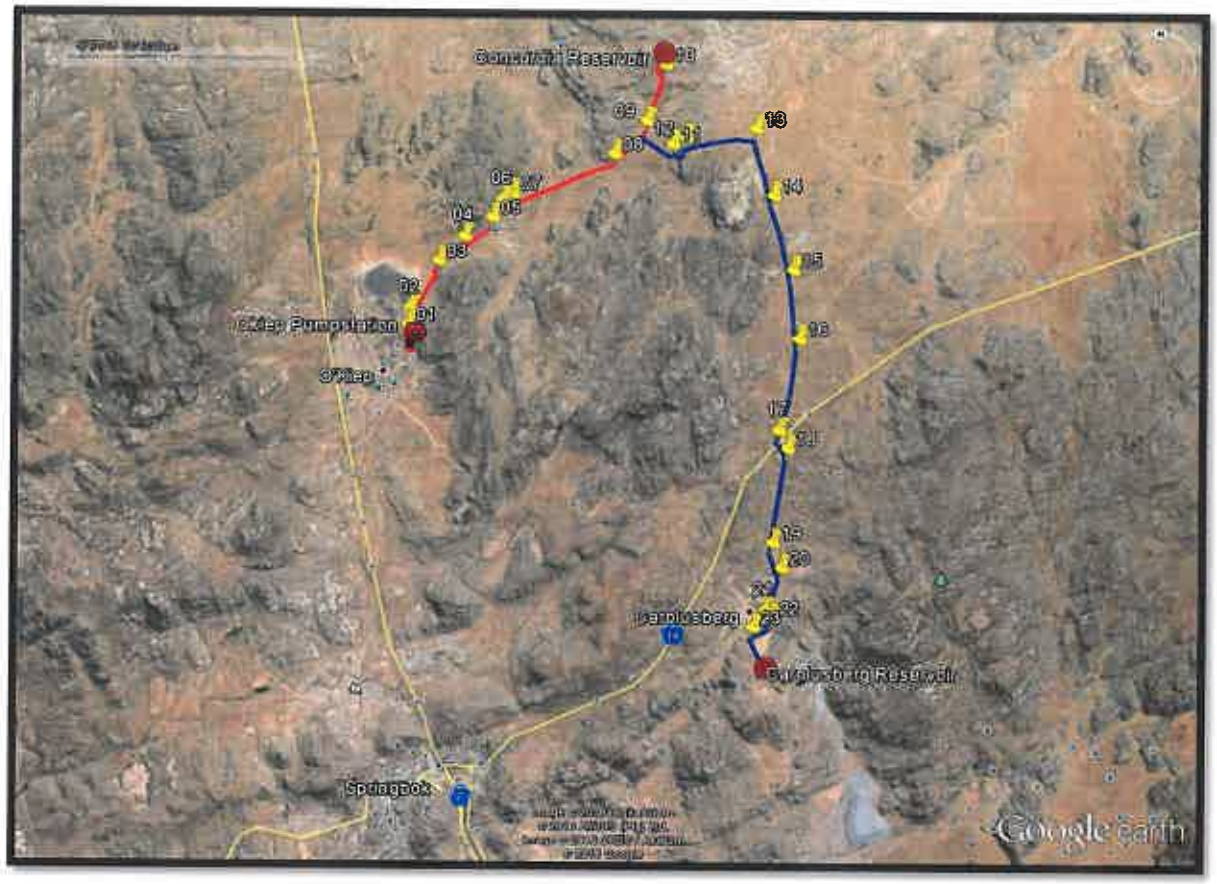


Table 2: Co-ordinates for the preferred Carolusberg pipeline replacement route as shown in Figure 4

ALTERNATIVE:	LATITUDE (S):	LONGITUDE (E):
• Starting point	29°33'22.87"S	17°55'50.22"E
• Point 11 (Start of rocky section)	29°33'34.98"S	17°56'9.09"E
• Point 12 (on top of rocky section)	29°33'31.59"S	17°56'17.75"E
• Point 13 (turning south towards Carolusberg)	29°33'26.10"S	17°57'6.31"E
• Point 14	29°34'6.16"S	17°57'18.37"E
• Point 15	29°34'50.87"S	17°57'32.33"E
• Point 16	29°35'32.11"S	17°57'36.76"E
• Point 17 (crossing underneath N14)	29°36'26.88"S	17°57'23.05"E
• Point 18	29°36'37.76"S	17°57'29.23"E
• Point 19	29°37'34.14"S	17°57'19.27"E
• Point 20	29°37'49.08"S	17°57'25.42"E
• Point 21	29°38'14.39"S	17°57'14.73"E
• Point 22	29°38'18.96"S	17°57'18.73"E
• Point 23	29°38'24.82"S	17°57'6.03"E
• End point (Carolusberg Reservoir)	29°38'41.20"S	17°57'16.18"E

The proposed new Carolusberg pipeline will tap into the Concordia line just south of Concordia and will then cross over a small koppie towards the main gravel road connecting Concordia and Carolusberg. The line will

then follow the road (placed within the road reserve wherever possible) all the way (and under the N14) to the Carolusberg Reservoir. The proposed pipeline will be:

- Approximately 12.7 km in length;
- With a maximum diameter of 0.25 m;
- It will pass over the Concordia commonage (mostly within the existing road reserve) into the urban edge of Carolusberg;
- It will cross a number of small seasonal drainage lines within the road reserve;
- It will cross natural veld (not listed in terms of NEMBA), within the road reserve;
- It is not expected to impact on any CBA or ESA (as identified within the Namakwa Biodiversity Sector Plan), but may pass within close proximity;
- The new pipeline will be placed above ground within the rocky sections and below ground in sandy sections (in order to reduce construction cost as well as environmental impact);
- Once the new pipeline is in operation all off the above ground sections of the original pipeline will be removed. In order to reduce costs the below ground sections will not be removed, but physical rehabilitation of significant remaining footprints will be done. It will result in a reduced construction footprint, which will reduce environmental disturbance significantly;

Please note that sections of the original pipeline are expected to still be asbestos or asbestos cement pipelines, which will need special handling and disposal (and which will increase the upgrade costs significantly if it has to be removed).

4. APPLICABLE LEGISLATION

Constitution of the Republic of South Africa (1996): of special relevance in terms of environment is section 24

Conservation of Agricultural Resources Act 43 of 1983 (CARA): supports conservation of natural agricultural resources (soil, water, plant biodiversity) by maintaining the production potential of the land and combating/preventing erosion; for example, by controlling or eradicating declared weeds and invader plants.

Fertilizer, Farm Feeds, Agricultural Remedies and Stock Remedies Act (Act No. 36 of 1947), to control the sell, purchase, use and disposal of agricultural or stock remedies.

Hazardous Substances Act 15 of 1973: to control substances that may cause injury, ill-health, or death through their toxic, corrosive, irritant, strongly sensitizing or flammable nature, or by the generation of pressure

National Environmental Management Act 107 of 1998 (as amended): replaces the Environmental Conservation Act (ECA) and establishes principles for decision-making on matters affecting the environment, and for matters connected therewith.

- **Environmental Impact Assessment Regulations** (R543 of 2010): procedures to be followed for application to conduct a listed activity.

National Environmental Management: Air Quality Act 39 of 2004 (NEMAQA): replaces the Atmospheric Pollution Prevention Act (No. 45 of 1965).

National Environmental Management: Biodiversity Act 10 of 2004 (NEMBA): supports conservation of plant and animal biodiversity, including the soil and water upon which it depends.

- **National list of ecosystems that are threatened and in need of protection** (GN 1002 of 9 December 2011).
- **Alien and invasive species list 2016** (GN R. 864 of 29 July 2016).

National Environmental Management: Protected Areas Act 57 of 2003 (as amended Act 31 of 2004) (NEMPAA): To provide for the protection and conservation of ecologically viable areas representative of South Africa's biological diversity and its natural landscapes and seascapes.

National Environmental Management: Waste Act 59 of 2008 (NEMWA): To reform the law regulating waste management in order to protect health and the environment by providing reasonable measures for the prevention of pollution and ecological degradation and for securing ecologically sustainable development.

- **List of Waste Management Activities that have, or are likely to have a detrimental effect on the environment** (GN 718 of 3 July 2009): Identifies activities in respect of which a waste management license is required.

National Forests Act 84 of 1998 (as amended): supports sustainable forest management and the restructuring of the forestry sector.

- **List of protected tree species** (GN 908 of 21 November 2014)

National Heritage Resources Act 25 of 1999: supports an integrated and interactive system for the management of national heritage resources, including supports soil, water and animal and plant biodiversity.

National Veld and Forest Fire Act 101 of 1998 (NVFFA): protects soil, water and plant life through the prevention and combating of veld, forest, and mountain fires

National Water Act 36 of 1998 (NWA): promotes the protection, use, development, conservation, management, and control of water resources in a sustainable and equitable manner.

Northern Cape Nature Conservation Act 9 of 2009 (NCNCA): which provides for the sustainable utilization of wild animals, aquatic biota and plants.

5. SITE SPECIFIC ENVIRONMENTAL CONCERNS

The purpose of this section of the EMP is to discuss possible significant environmental impacts that may be encountered. In other words, this section aims to give site specific guidance for impact minimisation in the context of the proposed development.

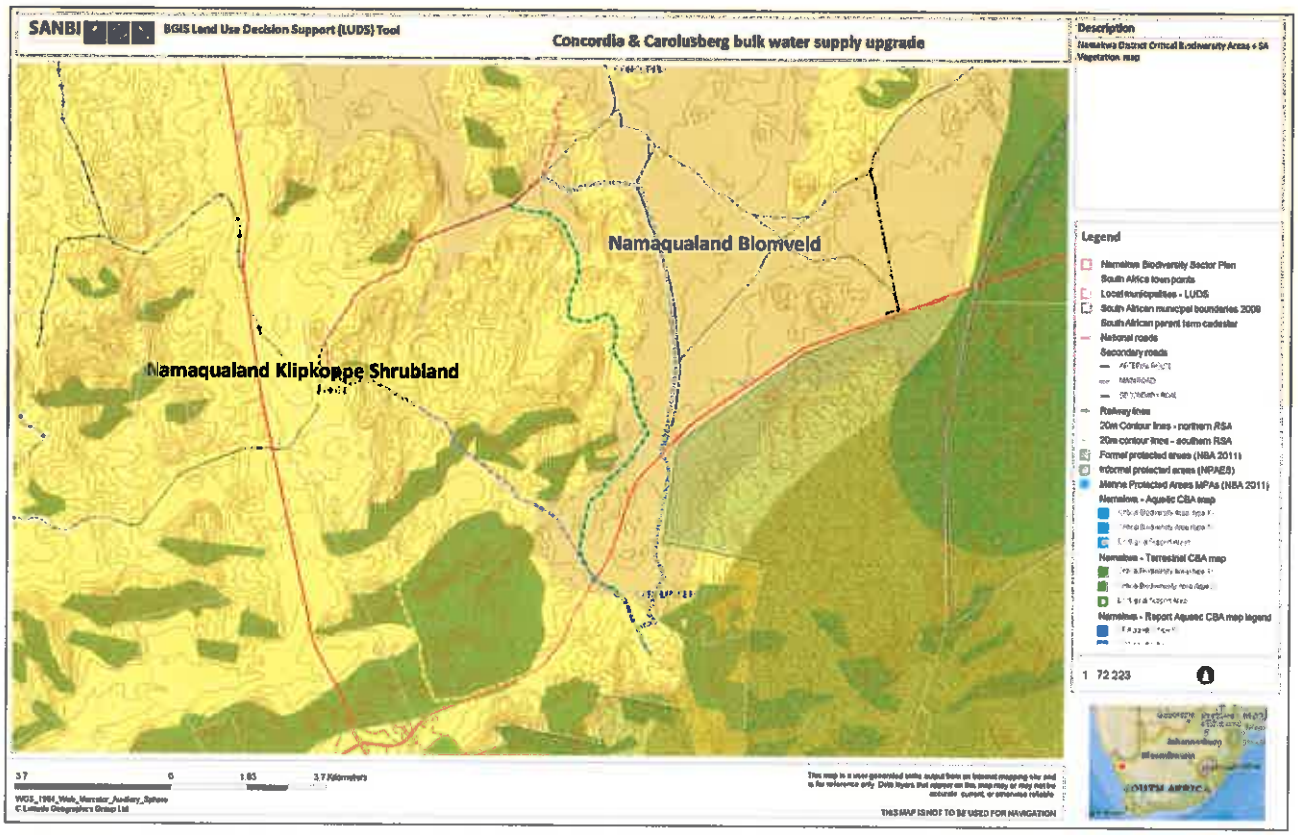
5.1 BIODIVERSITY ASSESSMENT

The following information is based on the biodiversity report commissioned for the project (PB Consult, 2016).

5.1.1 Vegetation

Between 95 – 97% of the areas that will be impacted by the preferred pipeline routes is still mostly natural veld of the Succulent Karoo Biome. The Succulent Karoo has little agricultural potential due to the lack of water. The scarcity of grasses limits grazing, and the low carrying capacity requires extensive supplementary feeds. Much soil has been lost from the biome, through sheet erosion, as a consequence of nearly 200 years of grazing. Tourism is a major industry with the spring mass flower displays one of the main attractions. Mining is important, especially in the north (Mucina et al, 2006).

Figure 5: Vegetation map of SA, Lesotho and Swaziland (2006), also showing CBA areas in green



The vegetation types encountered (Figure 5) were either Namaqualand Klipkoppe Shrubland associated with the huge granite and gneiss domes and disintegrating boulder koppies with Namaqualand Blommeveld in the valleys and flat areas between the granitic rocky hills of the Namaqualand Escarpment. Although poorly conserved, the vegetation types itself are not considered under threat (with more than 94% still remaining

according to the 2004 National Spatial Biodiversity Assessment). In some areas the vegetation has been subjected to intensive farming (ploughed) and it is also subject to constant grazing by goats and sheep. On the other hand the biome has a high number of rare and Red Data Book plant species and the high species richness and unique global status of the biome require urgent conservation attention. Thus, even though the vegetation types as such are not under threat, they are both in urgent need of further conservation and important in terms of species richness and uniqueness (the area surrounding Springbok specifically mentioned as a an area of special concern). It is thus important to minimise impacts on natural vegetation in good condition and especially to minimise impacts within critical biodiversity areas (CBA's) and ecological support areas (ESA's) networks as proposed within the Namakwa Municipal Biodiversity Sector Plan (2008), which are the proposed conservation network for achieving national conservation targets within the Namaqualand District.

The preferred Concordia pipeline will be located within the original construction footprint, and as such will minimise impact on natural vegetation. The preferred Carolusberg (A1) option, will be placed within the road reserve, which, although still natural veld in most instances, will reduce impact as a result of its placement near to existing road infrastructure (existing access). It is also proposed to place the pipeline aboveground when going over the klipkoppe, which will further reduce the construction footprint and thus impact significantly.

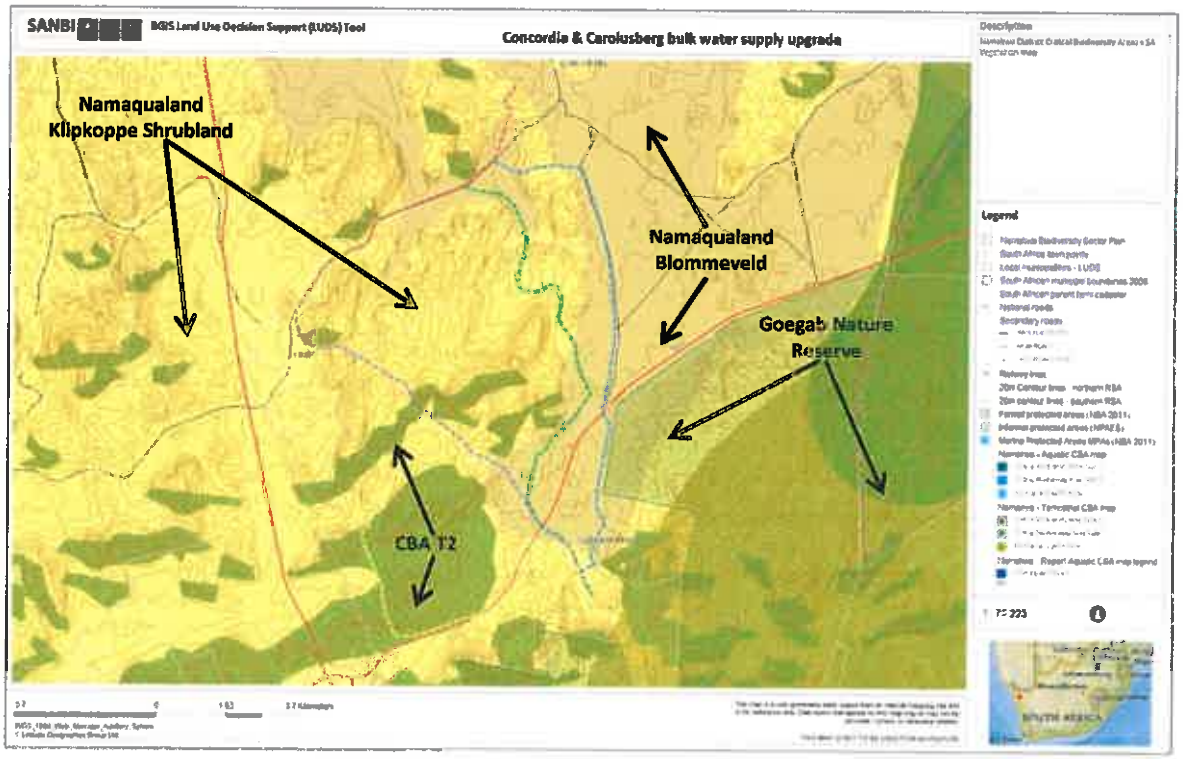
Mitigation

- Refer to recommendations (Heading 6).

5.1.2 Critical biodiversity areas

According to the Namakwa Municipal Biodiversity Sector Plan (2008) the preferred routes will not impact on any CBA area (Figure 6).

Figure 6: SANBI BGIS Vegetation map of South Africa (2012 update) combined with CBA overview



Mitigation

- Refer to recommendations (Heading 6).

5.1.3 Threatened and Protected plant species

South Africa has become the first country to fully assess the status of its entire flora. Major threats to the South African flora are identified in terms of the number of plant taxa Red-Listed as threatened with extinction as a result of threats like, habitat loss, invasive alien plant infestation, habitat degradation, unsustainable harvesting, demographic factors, pollution, loss of pollinators or dispersers, climate change and natural disasters. South Africa uses an amended IUCN system of categories in order to also highlight species that may be of low risk of extinction but are still of conservation concern (SANBI, 2015).

- **Red-listed plant species**: Two red-listed plant species was observed, namely the Kokerboom (*Aloidendron dichotomum*) and a small perennial herb, which is likely to be the listed *Moraea fenestralis*. However, both of these species are associated with the klipkoppe, which means that the above ground construction method to be used in the Klipkoppe area will minimise impact. Both preferred routes also minimise the impact on klipkoppe as a result of their placement.

In the Northern In the Northern Cape, species of conservation concern are also protected in terms of national and provincial legislation, namely:

- **Species protected in terms of NEM: BA** (National Environmental Management: Biodiversity Act, Act 10 of 2004): No species protected in terms of NEM: BA were encountered.
- **Species protected in terms of NFA** (National Forests Act, Act 84 of 1998): No species protected in terms of the NFA encountered.
- **Species protected in terms of the NCNCA** (Northern Cape Nature Conservation Act, Act 9 of 2009): Thirty (30) plant species protected in terms of the NCNCA were encountered (Refer to Table 10 within the Biodiversity Assessment – Appendix D1). Most of these species are locally common, but at least 6 species are recommended for search & rescue wherever they will be impacted.

Mitigation

- Before any work is done the construction footprint must be clearly demarcated (with the aim at minimal width/smallest footprint). The demarcation must include the total footprint necessary to execute the work, but must aim at minimum disturbance.
- All access to the klipkoppe areas must be approved by the ECO during construction, aiming at minimum disturbance.
- Before construction the footprint must be scanned by a botanist or suitably qualified ECO in order to identify plants of significance. The Botanist must advise on the best way to minimise the impact (e.g. through Search & Rescue) on such plants taking the following into account:
    - All *Aloe* (Alwyn), *Aloidendron dichotomum* (Kokerboom), *Bulbine, Crassula* and *Cotyledon* species encountered must be transplanted directly off the construction footprint wherever encountered.
    - A watering program must be implemented for transplanted plants.
    - All efforts must be made to protect all mature indigenous trees that might be encountered.

- Lay-down areas or construction sites must be located within already disturbed areas or areas of low ecological value and must be pre-approved by the ECO.
- Indiscriminate clearing of areas must be avoided.

5.1.4 Rivers & Wetland features

None of the proposed route options will cross any significant river system. But, both preferred routes will cross a number of small seasonal drainage lines (most of these very poorly defined). The Concordia line will cross these systems in the same footprint as the original pipeline, while the Carolusberg pipeline will cross them within the disturbed road reserve. The impact will be temporary (pipeline placed underneath these features) and with good environmental control all potential permanent impacts can be mitigated.

All water courses must be regarded as significant environmental aspects and care must be taken when working in or near such features. Emphasis must be on:

- minimising construction footprint (direct impact);
- rehabilitation of the river corridor and erosion control measures; and
- re-instating its functioning.

5.2 HERITAGE ASSESSMENT

The following information is based on the heritage impact assessment commissioned for the project (Agency for Cultural Resource Management, July 2016).

5.2.1 Heritage features encountered

Concordia to Okiep: No heritage resources were identified in the proposed (existing) route.

Carolusberg A1 (preferred route): Two stone cairns/graves, a stone farm boundary, and a kraal were recorded close to the proposed route (Refer to Figure 7).

Carolusberg A2: An abandoned farm house, a few isolated stone tools, a stone kraal, a probable pre-colonial Khoekhoen kraal with associated scatters of Later Stone Age implements, a `Christian' grave, and the remains of a dwelling were recorded close to the proposed route.

Carolusberg A3: Two graves and two possible graves/alternatively stone cairns marking old copper prospecting sites were recorded close to the proposed route.

Carolusberg A4: No heritage resources were identified in the proposed (existing) route.

5.2.2 Anticipated Impacts

Overall, as long as the recommendations made in this report are adhered too, no significant impacts to heritage resources are anticipated. In Carolusberg A1 (the preferred route) for example, no heritage resources will be impacted by the proposed construction of the water pipeline.

According to the SAHRIS fossil sensitivity map, the Springbok area is rated as having, a low (i.e. insignificant/zero) fossil sensitivity.

Figure 7: Google Image showing the Heritage features encountered relating to the Carolusberg A1 route option

5.2.3 Conclusion & recommendations

The HIA has identified no significant impacts to heritage resources that will need to be mitigated prior to, proposed activities commencing. Therefore, there are no objections to the authorization of the proposed project.

- **Concordia to Okiep**: No mitigation is required.
- **Carolusberg A1** (preferred route option): 1. Construction of the water pipeline must avoid a stone kraal (Site 339) which is located near the proposed route.

Table 3: Location of features encountered along the Carolusberg A1 route option

A1 Preferred				
339	S29 33.303 E17 56.258	Kraal	IIIa	Pipeline to avoid
340	S29 33.344 E17 56.162	Graves	IIIa	None required, will not be impacted by proposed construction activities
341	S29 33.334 E17 56.198	Stone farm boundary (historical)	IIIb	None required, will not be impacted by proposed construction activities

6. CONCLUSIONS AND RECOMENDATIONS

6.1 LEGAL REQUIREMENTS

Table 4: Summary of possible legal requirements applicable to the proposed project with recommendations

LEGAL REQUIREMENT	DISCUSSION	PROPOSED ACTION	RESPONSIBILITY
National Environmental Management: Biodiversity Act: The National Environmental Management: Biodiversity Act, Act 10 of 2004, provides for the protection of species through the "Lists of critically endangered, endangered, vulnerable and protected species".	No plant species protected in terms of NEM: BA was encountered	Not applicable.	
The National Forests Act: The NFA provides for the protection of forests as well as specific tree species. .	No protected tree species in terms of the NFA was observed.	Not Applicable	
Northern Cape Nature Conservation Act The Northern Cape Nature Conservation Act 9 of 2009 (NCNCA) provides for the sustainable utilization of wild animals, aquatic biota and plants.	**Thirty (30)** plant species protected in terms of the NCNCA were encountered (Refer to Table 10 within the Biodiversity Assessment – Appendix D1). Most of these species are locally common, but at least 6 species are recommended for search & rescue wherever they will be impacted	Apply for a DENC flora permit.	Applicant/EAP
The National Water Act: Section 21 of the NWA identifies a number of water uses that must be approved by the department. This includes impacts on any watercourse.	The Concordia pipeline is likely to be seen as existing lawful water use, which means that it is unlikely that a WULA will be applicable. A WULU application might be applicable in with regards to the temporary impact on the new Watercourses that will be impacted at the Carolusberg A1 route option.	Invite DWS to comment and establish the correct application procedure (if required).	Applicant/EAP
National Heritage Resources Act: In terms of Section 38 of the NHRA, a NID must be submitted to SAHRA for any linear activity exceeding 300 m or for any development that may change the character of a site involving 3 Ervin or more.	The HIA has identified no significant impacts to heritage resources that will need to be mitigated, but a number of features are listed to be avoided.	Refer to demarcation recommendations with regards to all identified Heritage features.	Applicant/ECO

6.2 RECOMMENDATIONS ON IMPACT MINIMISATION

- All construction must be done in accordance with an approved construction and operational phase Environmental Management Plan (EMP), which must be developed by a suitably experienced Environmental Assessment Practitioner.
- A suitably experienced ECO must be appointed to ensure compliance with environmental conditions of the Environmental Authorization.
- Application for a flora permit must be made in terms of the NCNCA with regards to protected species listed in Schedule 1 and 2 of the act.
- Access should be limited to existing routes and any additional temporary access routes must be approved by the ECO and rehabilitated on completion.
- When working near urban areas, construction should adhere to during reasonable working hours in order to minimise noise nuisance.

- All significant biodiversity features must be identified and mapped on the site plans. This includes all areas falling within Ecological support areas, Critical Biodiversity Areas (CBA1 & CBA2) as well as any river crossing. Special care must be taken when working in any of these areas.
- Before any work is done the construction footprint must be clearly demarcated (with the aim at minimal width/smallest footprint). The demarcation must include the total footprint necessary to execute the work, but must aim at minimum disturbance.
- All access to the klipkoppe areas must be approved by the ECO during construction, aiming at minimum disturbance.
- Before construction the footprint must be scanned by a botanist or suitably qualified ECO in order to identify plants of significance. The Botanist must advise on the best way to minimise the impact (e.g. through Search & Rescue) on such plants taking the following into account:
  - All *Aloe* (Alwyn), *Aloidendron dichotomum* (Kokerboom), *Bulbine, Crassula* and *Cotyledon* species encountered must be transplanted directly off the construction footprint wherever encountered.
  - A watering program must be implemented for transplanted plants.
  - All efforts must be made to protect all mature indigenous trees that might be encountered.
- Lay-down areas or construction sites must be located within already disturbed areas or areas of low ecological value and must be pre-approved by the ECO.
- Indiscriminate clearing of areas must be avoided.

- Identified heritage features must be demarcated as "No-Go" areas with a buffer zone of >20 m. Burial sites may not be disturbed or removed.
- SAHRA must be contacted should any archaeological or heritage remains be encountered during construction.

- In areas where the pipeline will be placed underground topsoil (the tope 15 – 20 cm of soil) must be removed and protected to be re-used during the rehabilitation after construction (the purpose being to re-use as much of the seed and bulb stock within the topsoil layer for re-establishing these species in the disturbed areas).

- All watercourses and stream must be classified as significant environmental features. When working within or near any watercourse:
  - The impact on the riparian corridor must be minimised through footprint minimisation.

- River or stream function must be restored as part of rehabilitation.
- River crossing should be done during low flow (dry season) wherever possible.
- River crossings should be diagonally to the river banks (the shortest route possible).
- Adequate measures must be implemented to ensure against erosion.

- All alien vegetation must be removed from within the construction footprint (the road reserve) and immediate surroundings (especially river corridors).
  - It is imperative that the correct alien eradication methods are employed (especially with regards to *Prosopis* control) as incorrect methods **WILL** aggravate the infestation (Please refer to the specific alien control methods described within the EMP).
  - Follow up work must be carried out after rehabilitation to ensure that no invasive alien plant re-establishes itself.

- All construction areas must be suitably rehabilitated on completion of the project.
  - This includes the removal of all excavated material, spoil and rocks, all construction related material and all waste material.
  - It also included replacing the topsoil back on top of the excavation as well as shaping the area to represent the original shape of the environment.
  - All absolute aboveground infrastructure associated with the original pipeline must be removed.
  - Not removing the old underground pipeline (especially within the rocky sections) should reduce the direct impact and footprint significantly, but any aboveground remains from the original pipeline should be removed.

7. CONSTRUCTION PHASE EMP

7.1 STRUCTURE AND RESPONSIBILITY

Implementation of the EMP and environmental control and management of the construction phase will be achieved through the responsibility structure set out below. The role players include the Applicant, the Construction Supervisor, the Environmental Control Officer (ECO) and the Contractor. All role players must familiarize themselves with the prescriptions of the EMP.

7.1.1 The applicant

The applicant (or the designated responsible person appointed by him) is responsible for:

- appointing a suitably experienced ECO, the Construction Supervisor and the Contractor for the duration of the construction contract, and
- ensuring that the Construction Supervisor and Contractor fulfil their obligations in terms of this EMP.

7.1.2 The construction supervisor

The Construction Supervisor is responsible to ensure that the construction is carried out to completion on time, within budged and that the Contractor fulfils his obligations in terms of the EMP. In addition, the Construction Supervisor and the ECO are expected to develop a close working relationship and to stay in contact with each other.

The responsibilities of the Construction Supervisor include:

- To issues site instructions to the Contractor.
- To serve as conduit for all communication between the ECO and the Contractor [The only exception is where the ECO or the Construction Supervisor needs to issue a "**STOP WORKS**" order on the contractor if serious environmental harm is about to happen or is happening as a result of construction activity. The "STOP WORKS" order must be confirmed by the other party as soon as reasonably possible].
- Discussing any problems that might lead to environmental damage with the ECO.
- When the ECO is not on site the Construction Supervisor will be responsible for the implementation of the EMP.

7.1.3 The contractor

The Contractor shall be responsible to:

- ensure that all sub-contractors, employees, suppliers, agents etc. are fully aware and adhere to the environmental conditions detailed in the EMP;
- liaise closely with the Construction Supervisor and the ECO;
- ensure that works on the site are conducted in an environmentally sensitive manner and in full accordance with the EMP;
- carry out instructions issued in the site instruction book;
- assist with solutions to environmental problems that may arise during the construction phase; and
- ensure that all "**No-Go**" areas are adequately fenced off.
- will report any deviation from the requirements of this EMP to the Principal Agent, and any pollution or environmental contaminant spill events.

- agrees to work stoppage and/or payment of penalties as required by this EMP and directed by the ECO/Construction Supervisor.
- agrees bear full costs for any work stoppage resulting from contravention of the requirements of this EMP, and/or the costs of remedying environmental damage resulting from their or their sub-contractors or employee's contravention of the requirements of this EMP.

NB: All contractors must sign the "Declaration of understanding" (page ii of this document) of this Environmental Management Plan before construction commences.

7.1.4 The Environmental Control Officer (ECO)

ECO will be responsible for overseeing the environmental aspects of the Construction phase and will work in close co-ordination with the Construction Supervisor.

7.1.4.1 ECO qualifications

The ECO must be independent and suitably qualified (a diploma or degree in environmental management with at least 5 or more years of environmental site management experience) and must have a sound knowledge of the environment in which the activity will take place.

7.1.4.2 ECO duties

An ECO must be appointed for the duration of the construction phase (as required by the EA). The ECO:

- will be primarily responsible for ensuring the implementation of the EMP and will perform regular site inspections/audits with the specific aim to ensure environmental conformance by the Contractor;
- to visit the site on a regular basis while construction is in progress;
- will keep environmental records (including photographs) of the construction activities;
- must ensure that "No-Go" and "Open Space" areas are adequately protected and adhered to;
- must approve and be present during the demarcation of the necessary areas for storage of materials, ablutions, eating areas of contract workers etc.;
- to conduct a start-up meeting before construction commences and will provide environmental training at the beginning of the project and will provide environmental awareness training throughout the life of the project;
- must be informed of site and technical meetings to be able to comment and report on environmental issues;
- will call for, and approve, method statements for construction activities that might pose an environmental impact and must ensure that method statements are approved before commencement of the work;
- must implement immediate mitigating action in the case of critical environmental impacts
- must deal with public complaints/queries regarding environmental issues;
- will record his findings and all environmental non-conformances in an environmental completion report (which will be forwarded to the Applicant and the Construction Supervisor);
- will conduct a closing down visit ASAP after completion of the Development;
- will commission an independent Environmental Compliance Audit within 6 months after completion of the contract.

7.1.4.3 ECO Authority

The ECO has the authority to stop works if there is a serious threat to or impact on, the environment as a direct cause of construction. However, this authority is limited only to emergency situations where immediate consultation with the Construction Supervisor is not possible.

- The ECO is to inform the applicant and site representative of the reasons for the stoppage as soon as possible. A relevant reason should be supplied as soon as possible after stoppage of such works.
- Upon failure by the contractor or his employee to show adequate consideration to the environmental aspects of this contract i.e. wilful destruction of the environment, the ECO may recommend to the applicant or site representative to have the contractor's representative or any employee(s) removed from the site or work suspended until the matter is remedied.
- No extension of time will be considered in the case of such suspensions and all costs will be borne by the contractor

7.1.5 Health & safety officer:

A health & safety (H&S) officer for the project must be designated or appointed by the Contractor or Principal Agent, and his/her role is to support the successful implementation of the EMP through:

- Site evaluation on a regular basis.
- Identifying issues relating to day to day construction activities and that can have a detrimental effect on the environment.
- Subcontractor audits to ensure compliance.
- Assist in the direct implementation of the EMP.
- Ensure that the requirements of the EMP are communicated understood by personnel on site *via* induction sessions.
- Ensure that the contractors on site develop, implement and monitor the required H&S management functions.
- Evaluate the applicability and accuracy of the EMP and the method statements throughout the construction phase.
- Coordinate all statutory requirements including permit authorisation and license requirements.
- Conduct or have conducted a hazard analysis and take the necessary corrective action.
- Where it is not possible to remove any remaining hazard's to inform employees thereof and what precautionary action is to be taken.
- Detail mitigation measures required to be taken, and the procedures for their implementation to the project manager.
- Representing H&S issues at the production meetings.
- Coordinate H&S training of personnel.
- Coordinating spill response personnel.
- The H&S officer shall inspect the integrity of the hazardous waste containers/bins/skips on a weekly basis.

7.1.5.1 Health & Safety Officer qualifications

The Health and Safety Officer must be independent and suitably qualified, with a sound knowledge of the Occupational Health & Safety Act (Act no. 85 of 1993), and must have experience of the implementation of the act with regards to the construction and environmental environments in which the activity will take place.

7.2 COMMENCEMENT OF WORKS

The site project contractors must timeously receive a copy of the construction phase EMP (CEMP) and any other further additional information that pertains to site conditions/amendments or deviations from original site plan.

- This EMP must be included to form part of the Contractors site specification documentation.
- A copy of the EMP must be on site at all times and available for presentation to any authority requesting to see such document.

NO WORK ON SITE MAY TAKE PLACE UNTIL

- The Declaration of Understanding/Environmental Contract is signed between the relevant parties.
- One week's written notice given to the Department before commencement of any construction activity (As per EA).
- On-Site Start-Up Meeting has been held
- Site and No-Go areas has been identified **and demarcated**.
- Contractors are in possession of the EMP and other relevant documentation
- Contractors/Sub contractors have signed the Declaration Of Understanding
- All mandatory site equipment is in place
- On Site Environmental Education & Awareness training session has taken place with all relevant construction personnel present.

NB: Work refers to: Camp Establishment, Earthmoving activities and any pre-limitary construction activities.

7.3 ISSUES OF CONCERN

Issues of concern that were identified in the Environmental Impact Assessment process and included in the EA or detailed in the Basic Assessment Report must be addressed during the "On Site Start-Up Meeting" and must be included in the On-Site Start-Up Report. Issues of Concern include but shall not be limited or restricted to the following:

- Demarcation;
- Establishment of construction site;
- Establishment of temporary laydown areas;
- Mandatory site equipment;
- Above ground bulk fuel storage facilities;
- Use and storing of hazardous substances;
- Waste management and disposal;
- Concrete works & batching plant facilities;
- Topsoil removal;
- Topsoil storage and protection; and
- Soil erosion & sediment control.

7.4 SITE SPECIFIC ARRANGEMENTS & CONSTRUCTION PROCEDURES

7.4.1 On-site start-up meeting

The mandatory **On-Site Start-Up Meeting** must be conducted prior to commencement of any site/camp establishment, earthworks and/or construction activities and will focus on site specific conditions and requirements that may be applicable to the project and may require additional or special measures of control.

On-Site Start-Up Meeting points of discussion are:

- The Construction EMP & other relevant site documents
- Project to be discussed and all uncertainties are cleared
- Method statement/s to be discussed
- Power line installation access routes
- Road and construction area to be demarcated
- Materials stockpile and lay down areas to be demarcated
- Method of stockpiling to be discussed
- Firefighting procedures
- Mandatory firefighting equipment & fire preventative measures
- Solid waste removal intentions
- Placement, type and service of toilets to be agreed on
- Placement and type of rubbish bins and removal of rubbish to be agreed on
- Labour overnight camp to be demarcated and services agreed on
- Environmental Education and awareness training session to all contractors & onsite staff/labour.
- Location & establishment of concrete batching plant facility.

7.4.2 Start-up meeting participants

Minutes of the onsite Start-Up Meeting will be condensed to a report format and circulated to all attendees of the above named meeting for their perusal and comments. The On-site Start-up Meeting report will form part of this EMP. If any discrepancies between the start-up report and the EMP arise the EMP will take precedence until clarification on the discrepancy is clarified. If any discrepancies between the EMP and the EA then the EA will take precedence until clarification on the discrepancy is clarified.

Participants to the start-up meeting can include:

- Applicants Representative.
- Main Contractor's Representative.
- Resident Engineer
- Site foreman.
- Environmental Consultant.
- Environmental Control Officer.

NB: It is the responsibility of the main contractors to ensure that all sub- contractors, that work on the site during and after the civil's contract, are informed of the environmental conditions pertaining to the site.

7.5 ENVIRONMENTAL AWARENESS TRAINING

7.5.1 Environmental awareness course

Environmental awareness training courses shall be run for all personnel on site. The ECO will be responsible for the initial awareness course which shall include all relevant management, the Construction Supervisor, the Contractor and all foremen. All attendees shall remain for the duration of the course.

The Contractor shall be responsible to ensure that all his personnel and subcontractors (if applicable) are informed and made aware of the environmental constraints and shall also supply the ECO with a monthly report indicating the number of employees used by him. If refresher courses are deemed necessary, for

instance, where personnel disregard the requirements of the EMP, the time lost and the cost of the course would be for the account of the Contractor.

7.5.2 Specific training

All contractors and workers shall be informed about any special habitat, biodiversity feature, vegetation and/or rare plant species that might be present on the specific construction site (if applicable).

7.6 MEHTOD STATEMENTS

Method statements from the contractor will be required for specific sensitive actions on request of the authorities, the Applicant or ECO.

A method statement forms the base line information on which sensitive area work takes place and is a "live document" in that modifications are negotiated between the Contractor and ECO/applicant, as circumstances unfold.

All method statements will form part of the EMP documentation and are subject to all terms and conditions contained within the EMP main document.

These documents must be available to the authorities for inspection or on request.

A method statement describes the scope of the intended work in a step-by-step description in order for the ECO and Applicant to understand the contractor's intentions. This will enable them to assist in devising any mitigation measures, which would minimize environmental impact during these tasks.

The Contractor must submit the method statement before any particular construction activity is due to start. Work may not commence until the ECO and applicant have approved the method statement.

Method statements need to be compiled by the contractor for approval by Applicant and the ECO. The contractor must submit written method statements to Applicant for the purposes of the environmental specification, a "Method Statement" is defined as a written submission by the contractor to Applicant setting out the plant, materials, labour and method the contractor proposes using to carry out an activity, in such detail that Applicant and the ECO is able to assess whether the contractor's proposal is in accordance with the specifications and/ or will produce results in accordance with specifications.

The method statement must cover applicable details with regard to:

- Construction procedures
- Materials and equipment to be used
- Getting the equipment to and from site
- How the equipment/ material will be moved while on site
- How and where material will be stored
- Location & establishment of concrete batching plant facility.
- The containment (or action to be taken if containment is not possible) of leaks or spills of any liquid or material (of any potential hazardous material) that may occur
- Timing and location of activities
- Compliance/ non-compliance with the Specifications, and
- Any other information deemed necessary by the Applicant and the ECO

The Contractor must abide by these approved method statements, and any activity covered by a method statement must not commence until Applicant and the ECO has approved of such method Statement.

7.6.1 Additional method statements

Any additional method statements (with regards to a specific aspect of construction) that may be required must be **submitted** and approved before commencement of the specific works and must be available at the site offices.

7.7 NON-COMPLIANCE

Applicant (on recommendation by the ECO) reserves the right at all times for the duration of this agreement to impose restrictions and associate penalties on the contractor with respect to the specific nature, timing and extent of construction activities on environmentally sensitive sites.

7.7.1 Corrective action instruction

The ECO may issue an onsite corrective action instruction to the site agent, or, by means of an entry into the Site Instruction Register for remedial work to be carried out to rectify any non-compliance that has been carried out within a reasonable agreeable time frame to carry out and complete the remedial work.

7.7.2 Written warning

In instances of non-compliance with the EMP by the contractor (or any of their employees) or sub-contractor/s (or any of their employees) that move on or off the site, the onsite ECO must issue a written warning indicating the non-conformance to the contractor.

If repeated instructions by the ECO to the site agent to respond to the corrective action instruction have not been carried out the ECO can issue a Written Warning notation instructing the site agent to timeously carry out the corrective measures as per the original non-compliance.

7.7.3 Penalty fines

In the event of the site agent negligence to respond and correct the noted non-compliance the ECO may in collaboration with the relevant parties recommend that a Penalty Fine be imposed on the contractor.

- The applicant, in consultation with the ECO must determine the amount of the penalty applicable;
- Such penalty amount must be in writing;
- Applicant may recover penalties by deducting the fine from the offending contractor;
- The contractor will be responsible for all costs incurred where emergency procedures are implemented to deal with accidents impacting on the environment as well as the rehabilitation of such damage in conjunction with the ECO and site engineer;
- In serious cases, at the discretion of Applicant and the Environmental Consultant/ECO, any multiple offences can be added together.

7.7.4 Stop works

The ECO (after consultation with Environmental Consultant/Applicant/Engineer) may also stop the works or part thereof until the situation is resolved; no extension of time is claimable by the contractor.

These penalties do not preclude any prosecution under any law or regulation.

7.8 CHANGES TO EMP

Although care has been taken to address all known relevant environmental issues for the construction phase, it may become necessary to add or amend certain procedures or instructions to improve the efficiency of the Environmental Management Plan (EMP).

- Only those additions or amendments of this EMP that will either improve environmental protection or can be proved not to have any negative effect to the immediate and surrounding environment will be considered.
- Changes or deviations have to be motivated in writing by means of a Method Statement and the same procedures for a standard Method Statement have to be followed.
- Any additions or amendments must be submitted by the ECO to DEA (if so requested) after the ECO has consulted with the Environmental Consultant and Applicant.
- No deviation from the contents of the EMP will be allowed without following the above procedures.

7.9 RECORD KEEPING

All records relating to the implementation of this Environmental Management Plan must be kept together, be readily retrievable and available for scrutiny by any relevant authority. Records include the following:

- Declarations of understanding;
- ECO Checklist, audits and/or diary;
- Method statements
- Photographs (must be taken before, during and immediately after construction as a visual reference);
- The Environmental completion statement.

These records must be available for scrutiny by any relevant authorities.

7.10 STANDARD MANAGEMENT PROCEDURES

7.10.1 Construction footprint establishment

Approved layout plans will be used to establish the construction footprint, and also to indicate significant environmental features (Refer to Par. 7.10.5 – No-Go Areas). The construction footprint refers to the total area that might be impacted during the construction activity.

- The construction footprint and No-Go areas will be discussed and agreed upon at the Start-up meeting (Refer to Par. 7.4.1);
- All relevant parties must be present during the process of agreeing on the construction footprint and no-go areas;
- All relevant parties must understand the implications of the construction footprint and no-go areas;
- The Start-up report will reflect the site specific environmental agreements, between the contractor, the applicant and ECO (Refer to Appendix 2);
- The construction footprint will be only area in which construction personnel and vehicles may operate in order to complete the development activity.

7.10.2 Demarcation

All sensitive areas or any area where construction may result in impact on the surrounding environment must be demarcated as well as any other area required by the environmental authorization or that have been agreed upon during the start-up meeting.

- A Method Statement may be required detailing the methods to be used.
- Demarcation must be done prior to the commencement of any work, including site establishment, placing of construction material or equipment on site, etc.;
- Site demarcation must be sturdy and visible and may not result in general waste (e.g. windblown danger type). A well-established method is to use dropper poles in combination with orange baler twine. The baler twine is attached to the dropper poles to demarcate boundaries and no-go areas (alternative fencing may be agreed upon depending on site requirements).
- All demarcation must be approved by the ECO.
- Individual sensitive features (e.g. trees, rocks, graves etc.) threatened by construction activities, may require additional demarcation.
- NB: Also note the requirements discussed under the following paragraphs: 7.10.6; 7.10.7; 7.10.4; 7.10.11; 7.10.8; 7.10.9.
- Demarcation, fencing and barriers must be maintained in good order for the duration of construction activities.
- Demarcation may not be moved, re-located or altered or changed without the approval of the ECO.
- Any temporary fencing removed for the execution of any portion of the works is to be reinstated by the Contractor as soon as practicable.
- The Contractor at the end of the contract must remove all demarcation, fencing or barriers not forming part of the final works on Site.

7.10.3 Access & haul routes

The Contractor must control all access (vehicles and plant) to and from the construction site, including that of his suppliers so that they remain on the pre-approved designated routes. In addition such vehicles and plant must be so routed and operated as to minimise disruption to regular users of the routes.

- Where heavy duty vehicles and construction plant are required, both the type of vehicles/machinery and the area/s these are to access shall be specified in a Method Statement.
- Access routes/haul roads will utilise only existing roads or tracks, unless such routes are not available or new routes are to be constructed as part of the project, in which case a Method Statement must be submitted for the construction of any new access/ haul roads (including temporary routes).
- No new roads or tracks may be created except where such routes are specifically approved by the ECO, in the EA or in this EMP.
- Any new access roads/haul roads must be designed so as to minimise erosion and must run across slopes and not directly up-hill.
- All vehicles and access to the site must remain within demarcated access routes and working areas on site.
- All reasonable measures must be implemented to minimize impacts on local commuters e.g. limiting construction vehicles travelling on public roadways during the morning and late afternoon commute time and avoid using roads through densely populated built-up areas so as not to disturb existing retail and commercial operations.
- On gravel or earth roads on site, the vehicles of the Contractor and his suppliers may not exceed a speed of 25 km/h.
- On public roads adjacent to the site vehicles will adhere to municipal and provincial traffic regulations.
- All temporary access routes must be rehabilitated at the end of the contract to the satisfaction of the ECO.

If so required by the owner of the land the following may also apply with regard to access and vehicular movement on site:

- All Contractors, subcontractors and staff shall be identified by clothing with company logos and be in possession of valid SA identity documents.
- Deliveries, removals etc. to be completed during normal working hours (unless otherwise agreed upon by the Construction Supervisor.
- No personnel shall stay permanently on site, unless permission to stay on site provided as part of the construction contract.
- Access routes must be demarcated by orange twine/danger tape on steel posts or temporary fencing.
- The Contractor shall at his cost document the existing condition of all access roads prior to commencement.
- Should any damage occur to the access road as a result of the upgrade activities, the road will be rehabilitated to its original state with all costs borne by the contractor.

7.10.4 Appropriate use of machinery

Contractor must at all times carefully consider what machinery is appropriate to the task while minimizing the extent of environmental damage.

- The contractor may not operate any machinery including a fuel driven compressor outside the demarcated area.
- All vehicles and equipment must be routinely inspected for fuel and oil leaks and kept in good working order and serviced regularly. Leaking equipment must be repaired immediately or removed from the Site. When servicing equipment, drip trays must be used to collect the waste oil and other lubricants. Drip trays must also be provided in construction areas for stationary plant (such as compressors) and for "parked" plant (such as scrapers, loaders, vehicles). Drip trays will be kept free of water that will float the oil to overspill. All drip trays / bungs to attain a 120% capacity of the plant fuel / oil capacity.

- Where practical, all maintenance of plant and machinery on Site must be performed in workshops. If it is necessary to do maintenance outside of a workshop area, the Contractor must obtain the approval of the Engineer and the ECO prior to commencing activities.
- Appropriate 2.5 kg (minimum requirement) dry powder SABS approved and service certified firefighting extinguisher must be a mandatory item on all vehicles working and moving on or off the construction site.
- The servicing, repairs and maintenance of all construction machinery must take place at the designated service and maintenance yard and not along the proposed new road construction route.

7.10.5 "No-Go" areas

Specifications of the Environmental Authorisation (EA), the Environmental Management Plan (EMP) or the On Site Start-Up Meeting (OSSM) can require that certain areas are to be considered as "No go" areas as a result of their environmental significance or proximity to environmental significant features.

- No-Go areas will be demarcated and indicated on a site plan.
- A Method Statement may be required by the ECO, detailing the method of fencing for protection of such conservation areas.
- No-Go areas are out of bounds to the Contractor and his staff, sub-contractors and their staff or suppliers and their staff or any other person involved in the project, without the written permission specified by the ECO.
- The Contractor must ensure that, insofar as he has the authority, no person, machinery, equipment or material enters the designated "No Go" areas at any time.
- All contractors must be made aware of the importance of these features and the consequences of non-compliance.

7.10.6 Protection of natural veld

Habitat fragmentation is usually defined as a landscape-scale process involving both habitat loss and the breaking apart of habitat. Habitat loss has large, consistently negative effects on biodiversity. Habitat fragmentation per se has much weaker effects on biodiversity, but could be just as negative. As such the construction activities must endeavour to minimise its impact on any remaining natural features and natural corridors.

- All remaining natural corridors identified as significant biodiversity features during the environmental assessment stage, must be mapped and identified as "No-Go" areas on the site plans and protected measures must be installed (demarcated);
- Except to the extent necessary for the carrying out of the works, no flora may be removed, damaged or disturbed;
- Trapping, poisoning and/or shooting of animals is strictly forbidden. No domestic pets or livestock are permitted on Site;
- Where the use of herbicides, pesticides and other poisonous substances are to be used, the Contractor must submit a Method Statement;
- The Contractor may not deface, paint, damage or mark any natural features, if these should occur (e.g. trees, rock formations, buildings, etc.) situated in or around the Site for survey or other purposes unless agreed beforehand with the Engineer and the ECO. Any features affected by the Contractor in contravention of this clause must be restored/rehabilitated to the satisfaction of the Engineer and the ECO.
- All incidents of harm to any animal or natural vegetation (apart from the agreed upon areas) must be reported to the ECO.

7.10.7 Protection of flora

A plant rescue and protection plan which allows for the maximum transplant of conservation important species from areas to be transformed must be implemented.

- The areas of vegetation that are to be protected during construction must be demarcated and indicated as "No-Go" areas on a site plan. Include the area under the canopy of trees so that tree roots will not be damaged by soil compaction.
- All flora identified to be rescued must be removed and placed in an area specifically allocated for these plants to ensure that the necessary care thereof will take place until being relocated and planted in designated areas.
- The specialist must also advise and oversee a re-vegetation and habitat rehabilitation plan during the construction and operation of the facility. Restoration must be undertaken as soon as possible after completion of construction activities to reduce the amount of habitat converted at any one time and to speed up the recovery to natural habitats.
- Also refer to the requirements of the rehabilitation and restoration guidelines (Refer to paragraph 7.10.28).

7.10.8 Protection of fauna and Avi-fauna

Trapping, poisoning and/or killing of animals is strictly forbidden. No domestic pets or livestock are permitted on Site. Many slow moving animals, local amphibian and other species follow instinctive movements along roadside corridors where they travel from place to place.

- Every effort must be implemented on a daily on-going basis by the contractor to ensure that the construction areas have been checked for any animals and to ensure their removal and protection from direct and in-direct impacts during the construction activities.
- The removal of fauna from the site must be done in accordance with the requirements of the Nature Conservation Ordinance regulating these activities.
- Environmental corridors and "No-Go" areas must be demarcated and protected.

7.10.9 Clearing of vegetation

The contractor shall take all reasonable steps to minimise the impact of his activities on the environment. If natural vegetation has to be removed for construction purposes, it must be done in accordance with the conditions of the approved environmental authorisation.

Vegetation clearing:

- A Method Statement may be required detailing the methods to be used for vegetation clearing.
- All cleared areas must be stabilised as soon as possible.
- Burning of cleared vegetation on site is prohibited.
- The burying of cleared vegetation or use as part of backfill or landscape shaping is prohibited unless written approval is obtained from the ECO.
- Cleared vegetation may be used for mulch or slope stabilisation of the Site.
- Should bulk vegetation be removed from the designated working areas (foot print area) then tall vegetation shall first be removed through brush cutting and chipping of larger shrub material; this may be added to the topsoil material stockpiles as mulch.
- Unless otherwise agreed upon, only indigenous plant material shall be used for this purpose.

7.10.10 Topsoil removal

Topsoil is described as the top 15 – 20 cm of soil, containing >80% of the seedbed and possibly bulb species. Please note that "topsoil" in this case, does not refer to the organic layer described as topsoil in agriculture or gardening. Topsoil must be carefully removed and protected to be re-used during rehabilitation.

- A Method Statement may be required detailing the methods to be used.
- Topsoil must be stripped on the construction footprint. Only by specialist recommendation may topsoil be left (e.g. instances where topsoil removal may result in a larger impact than not stripping the topsoil as in some semi-desert karroid areas).
- Topsoil must be stripped prior to any activity within the footprint area, to a depth of 200 mm (deeper if specified by the ECO through a site instruction approved by the applicant).
- Topsoil must be stockpiled and protected in a designated area for re-use during rehabilitation (separate demarcation may be required).
- Topsoil may not be contaminated (not even by clean spoil or sub-soil) or compacted.
- Topsoil from different soil types must be stockpiled separately and replaced in the same areas from which they were taken. This is very important in areas that may contain rare or endangered species.
- Where topsoil needs to be stored for extended periods or is likely to be subjected to erosion (wind or water) the ECO may require additional protection methods (e.g. covering the topsoil with netting or hessian).

7.10.11 Erosion & sedimentation control

The Contractor must take appropriate on-going and active measures to prevent erosion resulting from his own construction activities and operations as well as storm water control measures to the satisfaction of the ECO. During construction the Contractor must protect areas susceptible to erosion by installing all the necessary temporary and permanent drainage works as soon as possible.

In order to achieve erosion and sediment control, the following are applicable to all sites:

- No new development, without written authority approval, will be allowed on slopes greater than 12% (CARA, regulation 3). If applicable terraces will be made in accordance with agricultural regulations.
- Install erosion and sediment controls before work starts and maintain these features throughout the construction and operational phases (as applicable).
- Leave as much vegetation as possible.
- Install temporary fences to define "No Go" areas in those areas that are not to be disturbed.
- Divert run-off from upslope away from the site, but ensure that it does not cause downstream erosion. For example, dig drainage channels (catch drains sized to accommodate the upslope catchment).
- Install sediment controls down slope of the site to catch sediment (if applicable).
- Inspect and maintain erosion and sediment controls regularly.
- Limit vehicle movement to the site and control access points. Clearly mark such access points and inform all suppliers.
- Save and re-use topsoil during re-vegetation. Never store topsoil around trees as this may kill them. Spread the topsoil back when the work is finished and re-vegetate the site as soon as possible to control erosion. Remove the sediment and erosion controls only after re-vegetation was successfully implemented.
- Store all stockpiles and building materials behind sediment fences. Cover them with plastic to prevent erosion by wind.

- It is illegal to discharge water into a public stream if the quality does not conform to the required health or water standards. Other measures as may be necessary must be taken to prevent the surface water from being concentrated in streams and from scouring the slopes, banks or other areas. All potential hazardous fluids / materials must be protected from the rain to prevent them being washed into storm water channels. All such measures must be discussed with and approved by the ECO.
- Build a dam below the area used for cutting tiles, concrete and bricks. Surround the wash-out area with a sediment fence that slows down the water flow. Filter or settle-out all water pumped off the site. The water must be clear before it enters the storm water system or creeks. Gypsum can be applied to muddy (turbid) water to help clay particles settle.
- Fill in all trenches immediately after services have been laid.

7.10.12 Alien invasive management plan

In accordance with Regulation 15 and 16 of the Conservation of Agricultural Resources Act, 1983 (Act no. 43 of 1983) (CARA) as amended, all listed alien invasive plant species must management on any land in SA. As such an alien invasive management plan may be required to be implemented during construction and operation phase of the project. If such a plan is required, it must include mitigation measures to reduce the invasion of alien species and ensure that the removal of alien species is undertaken. Wetlands and rivers are especially susceptible to many of species.

- In accordance with CARA all identified alien invasive plants encountered on the property and its immediate surroundings must be controlled.
- All alien invasive species must be identified and removed from each site and its immediate surroundings. This is especially true for any remaining natural corridor on site.
- No vegetation may be buried or burned on site.
- Where the use of herbicides and other poisonous substances are to be used, the Contractor must submit a Method Statement.

The invader status of the various invasive alien species in South Africa is described in accordance with Regulation 15 and 16 of the Conservation of Agricultural Resources Act, 1983 (Act no. 43 of 1983) (CARA) as amended (the 3 categories and its control are summarised underneath).

Category 1 (Declared Weed)

- Prohibited on any land or water surface in South Africa
- Must be controlled or eradicated (except in biological control reserves).

Category 2 (Declared Invader – commercial value)

- Allowed only in demarcated areas under controlled conditions
- Outside of controlled areas invaders must be controlled or eradicated where possible
- Prohibited within 30 m off the 1:50 year flood line of watercourses or wetlands unless authorization has been obtained

Category 3 (Plant Invaders – ornamental value)

- Allowed only in areas where they were already in existence with the promulgation of the regulations.
- Prohibited within 30 m of the 1:50 year flood line of watercourses or wetlands unless authorization has been obtained.
- All reasonable steps must be taken to ensure that they do not spread.
- Propagative materials of these plants (e.g. seeds or cuttings) may no longer be planted, propagated, imported, bought, sold or traded in any way.

7.10.13 Protection of archaeological & paleontological remains

Archaeological remains are ancient man-made objects, structures, or ancient burials that have been preserved on the earth's surface, underground, or underwater and serve as the historical sources that make it possible to reconstruct the past history of human society, including mankind's prehistory. Palaeontology or Palaeontology, on the other hand, is the study of prehistoric life. It includes the study of fossils to determine organisms' evolution and interactions with each other and their environments (their paleoecology). Palaeontology lays on the border between biology and geology, and shares with archaeology a border that is difficult to define.

- Basic archaeological remains include work tools, weapons, domestic utensils, clothing, and ornaments; settlements including campsites, fortified and unfortified settlements, and separate dwellings; ancient fortifications; the remains of ancient hydraulic structures; ancient agricultural fields; roads; mining pits and workshops; ancient burial grounds and various burial and religious structures (stelae, stone figurines, stone fish monoliths (vishaps), menhirs, cromlechs, dolmens, sanctuaries); drawings and inscriptions carved into individual stones and cliffs; and architectural monuments. Archaeological remains also include ancient ships and their cargoes that sank in rivers and seas and settlements that came to be underwater as a result of shifts in the earth's crust
- Should any unmarked human burials/remains or ostrich eggshell water flask caches be uncovered, or exposed during construction activities, these must immediately be reported to the ECO and South African Heritage Resources Agency (SAHRA) (At: Ms Mariagrazia Galimberti 021 462 4502) for information on the appropriate course of action to be taken. Burials, etc. must not be removed or disturbed until inspected by an archaeologist or without written approval from SAHRA.
- Should any substantial fossil remains (*e.g.* vertebrate bones and teeth, shells, petrified wood) be encountered during excavation, however, these should be reported to SAHRA for possible mitigation by a professional palaeontologist.
- Note that the Contractor may not, without a permit issued by the responsible heritage resource authority; destroy damage, excavate, alter, deface or otherwise disturb any archaeological site or archaeological material. The latter is a criminal offence under the Heritage Resources Act.

SAHRA contact details:

PO Box 4637, CAPE TOWN, 8000

111 Harrington Street, Cape Town

Tel: (021) 462 4502

Fax: (021) 462 4509

Website: www.sahra.org.za

7.10.14 Storage of construction material & stockpiling

New construction material will be stored in demarcated areas on the affected properties prior to commencement of reconstruction of decommissioned power line. The Contractor must provide a method statement (for approval by the ECO) of the construction activities which will indicate:

- the type and quantity of material to be stored;
- whether any oil contaminated/containing equipment will be stored;
- how (including what type of vehicles will be required) it will be deliver the material on site at the necessary storage area; and
- whether there is any risk of spill or runoff of any building materials or chemicals and how this is to be mitigated.

In addition:

- The Contractor must ensure that any delivery drivers are informed of all procedures and restrictions (including "no go" areas) required to comply with the Specifications. The Contractor must ensure that these delivery drivers are supervised during off-loading, by someone with an adequate understanding of the requirements of the Specifications.
- All manufactured and/or imported material must be stored within the demarcated area, and, if so required, out of the rain. All lay down areas outside of the construction camp must be subject to the Engineer and the ECO's approval in such a way as not to cause a nuisance or environmental damage.
- All building materials are to be prepared at the batching plant, to enable the effects of cement and other substances, and the resulting effluent to be more easily managed.
- It is essential that any imported material i.e. base material for road works, building sand, bedding base sand for pipe / cable lines etc. must be screened and of which the origins must be identified prior to arriving at the receiving environment, this must be approved by the Engineer / ECO.
- Special care must be taken to prevent bringing in materials contaminated with seed of Invasive Alien Plants. Contractors shall not import construction materials such as sand, gravel or fill contaminated with seed of Invasive Alien Plants, or quarried from areas surrounded by Invasive Alien plant species such as Port Jackson or Rooikrans.
- The Contractor must negotiate appropriate space on for this purpose on an area away from natural vegetation and any wetland habitat with the ECO.
- The Contractor must ensure that all staff, contractors and subcontractors are aware of and keep material within these designated storage areas. The Construction Supervisor shall ensure that the consultant team is familiar with same.
- Contractors will not be allowed to store new construction material on the sides of the access road, or within natural vegetation or next to the existing access road.
- Stockpiling of gravel, cut, fill or any other material including spoil should only be allowed in degraded areas or areas below the future cover of buildings and tar or paved parking surface.
- Any area used for stockpiling and not covered by building development must be returned to at least the state they were in before stockpiling and it must be ensured that the erosion potential of these areas is not increased.
- The Contractor must ensure that the material does not blow or wash away or mix with each other. If the stockpiled material is in danger of being washed or blown away, the Contractor must cover it with a suitable material, such as hessian, netting or plastic.
- Also refer to the traffic- and transportation management plans and their requirements.

7.10.15 Oil storage and management

An important potential environmental impact is oil spills from any oil filled equipment and machinery that may occur during transportation or storage of decommissioned and new construction material/ equipment. The following conditions shall apply:

- Vehicles must be checked for oil leaks prior to going on site
- Care should be taken to prevent any potential oil spillage during upgrading activities.
- Sufficient measures should be put in place to ensure that any potential oil spills are mitigated.
- An oil spill kit should be available on site at all times during the construction activities;
- Oil containment facilities should be provided for any oil filled equipment onsite;
- All oil spills must be reported to the ECO within 24 hours, indicating the containment and rehabilitation measures implemented

Oil spill kits are available from:

- Drizit (021) 531 5335
- Enretech (021) 683 1858
- Pinelands Environmental Technology (021) 531 3749

7.10.16 Storing of petroleum products

Petroleum fuels contain harmful substances known to cause health problems and can easily have adverse effects on water quality, and the environment. Petroleum spills can move rapidly into the soil and quickly contaminate drinking water. In order to prevent pollution it is important to, use proper methods when handling, using, and storing diesel fuel, gasoline, kerosene, or other petroleum products.

The South African National Standards pertaining to the installation of a storage tank include:

- Sans 310, which requires that an aboveground storage tank be of sufficient structural strength, based on sound engineering practices, to withstand normal operations and use;
- Sans 1668, for fibre-reinforced plastic tanks for the underground storage of petroleum products;
- Sans 10089-1, which deals with the storage and distribution of petroleum products in aboveground bulk installations; and
- Sans 1535, for glass- reinforced polyester-coated steel tanks, for the underground storage of hydro-carbons and oxygenated solvents, which are intended to be buried horizontally.

Above ground fuel storage tanks

Any fuel storage proposals must be cleared by the ECO before any storage or stockpiling takes place. If the contractor proposes to install above-ground fuel storage tanks for use during the construction phase of the project, the following basic requirements must be adhered to:

- A Method Statement, explaining the method of storage and mitigation measures to prevent spillages must be submitted to the ECO and accepted prior to the installation of such a fuel storage facility (please note that storage of any hazardous substance of 5 000 litres or more require environmental authorization).
- The fuel tank must be placed within a completely sealed concrete bund (containment structure) which must be able to contain at least 120% of the total capacity of the fuel tank.
- The bunded area should be built to be at least a third wider (on all sides) than the base of the fuel tank in order to maximise its capability to contain spillages and leakages.
- The fuel distributor must also be located within bunded area to better prevent against accidental spillages during refuelling.
- In addition, drip trays are to be used during refuelling.
- All vehicles, equipment, fuel and petroleum services and containers must be maintained in a good condition that prevents leakage and possible contamination of soil or water supplies.
- Fuel storage areas must comply with general fire safety requirements.

Storing of smaller quantities of fuel or oil

Any fuel storage proposals must be cleared by the ECO before any storage or stockpiling takes place. If the contractor proposes to use only small fuel storage facilities (< 200 litres) the following basic requirements must be adhered to:

- Fuels and oils must be safely located out of harm's way from the elements and safety and fire prevention must be strictly adhered to.
- All fuel oil containers must be placed within suitable drip trays to prevent accidental spillage of oils and fuels.

- A suitable leak proof container for the storage of oiled equipment (filters, drip tray contents and oil changes etc.) must be established.
- All spills are to be recorded in the ECO diary.

7.10.17 Storing of hazardous substances

If potentially hazardous substances are to be stored on site, the Contractor must submit a Method Statement detailing the substances and/or materials to be used, together with the storage, handling and disposal procedures of the materials to the ECO.

- Hazardous materials must be stored under lock and key in designated areas with properly displayed and visible warning signs.
- No works related to the submitted Method Statement may commence until the Method Statement has been studied and approved in writing.
- An effective monitoring system to detect any leakage or spillage of all hazardous substances during their transportation, handling, use and storage must be implemented. This must include precautionary measures to limit the possibility of oil and other toxic liquids from entering the soil or storm water systems.
- Measures to protect hydrological features such as streams, rivers, pans, wetlands, dams and their catchments, and other environmental sensitive areas from construction impacts including the direct or indirect spillage of pollutants must be implemented.
- **Paints:** - No paint products may be disposed of on Site and brush/roller wash facilities must be established to the satisfaction of the Engineer and the ECO. Oil based paints and chemical additives and cleaners such as thinners and turpentine must be strictly controlled. A Method Statement detailing the paint management procedures is required.
- **Hazardous building materials:** -Hazardous building materials (e.g. asbestos, fibre claddings, refrigerants, coolants, sub-station cooling oils, etc.) must be identified and dealt with in accordance with the relevant safety and health legislation. All such material must be separated on Site and disposed of at appropriate licensed disposal sites. The Contractor must supply the ECO with a certificate of disposal.

7.10.18 Use of cement or concrete

The Contractor is advised that cement and concrete are highly hazardous to the natural environment because of the high pH levels of the material, and the chemicals contained therein. Wash-out water with high pH is the number one environmental issue for the ready mix concrete industry. The alkalinity levels of wash water can be as high as pH 12, which is toxic to fish and other aquatic life.

The Site Supervisor or Contractor must indicate the need for and the proposed location of concrete batching plants which includes the location of cement stores, sand and aggregate stockpile areas. A Method Statement indicating the layout, type of concrete batching preparation (dry or wet mix). The site agent must indicate on the Method Statement proposed total volume of concrete that is needed for the completion of the entire project.

Concrete/cement mixing:

- Concrete and cement may only be mixed on existing hard surfaced areas, or edged mortar boards or a suitable container. Concrete may not be mixed or stored directly on the ground under any circumstances;

- The visible remains of the batch and concrete, either solid, or from washings, must be physically removed immediately and disposed of as hazardous waste.
- Washing of equipment shall be done in a container to prevent any runoff of contaminated washing water.
- Extreme care must be taken to limit the amount of water contaminated by washing equipment. Water from concrete washing can be re-used in concrete mixes or must be stored in drums, then removed from the site and disposed of at a licensed municipal dump site.

Concrete batching plants

The following procedures must be implemented to control waste water run-off from concrete batching plant locations:

- The location of concrete batching areas must be approved by the ECO (if possible/appropriate, the use of ready-mix concrete is preferred).
- Concrete batching facilities must have suitable bunding methods in place to ensure minimal waste water run-off occurs during batching operations.
- Contaminated water may not enter a natural or man-made (e.g. trench / sloot or dam) water system. Preventative measures include establishing sumps from where contaminated water can be either treated in situ or removed to an appropriate waste site.
- Dry mixing batching areas to be carefully placed in consultation with the ECO.
- Cement bags are to be stored securely out of harm's way from the elements (wind and rain). Bags have to be covered and placed on plastic sheeting. Used cement bags must be disposed of on a regular basis via the solid waste management system, and must not be used for any other purpose.
- Sand and stone used for cement or concrete batching must be stored on plastic layers (or on ECO approved disturbed areas) in order to prevent contamination of the natural environment.
- Cleaning of equipment and flushing of mixers must not result in pollution of the surrounding environment. All wastewater resulting from batching of concrete must be disposed of *via* the contaminated water management procedure.
- Excess or spilled concrete must be confined within the works area and all visible remains of excess concrete must be physically removed and disposed of on completion of cement work. Washing the remains into the ground is not acceptable. All excess aggregate must also be removed.
- Wash-down areas must be confined to within the concrete batching areas only.

7.10.19 Blasting / drilling

In the event where blasting or rock drilling is required, the following must be implemented:

- A Method statement must be provided for each case separately **prior** to commencement of blasting works.
- The contractor must take all necessary precautions to prevent damage to special features and the general environment, which includes the removal of fly rock.
- The contractor must ensure that no pollution results from drilling operations, either as a result of oil and fuel drips, or from drilling fluid. The contractor must take all reasonable measures to limit dust generation as a result of drilling operations.
- The ECO must be given 24-hour notice before blasting events.

7.10.20 Fire fighting

Adequate firefighting equipment according to the fire hazard during the construction period must be available on site and in good working order (at least one type ABC (all purpose) 2.5 kg extinguisher and 3 fire beaters per working area). The persons on site must be trained in the use of such equipment.

- The main contractor must provide a list of all authorities involved in firefighting in the region. This list must include emergency contact numbers and must be visible at the site office.
- Welding, gas cutting or cutting of metal will only be permitted inside the working areas.
- The Contractor must pay the costs incurred to organizations called to put out any fires started by him. The Contractor must also pay any costs incurred to reinstate burnt areas as deemed necessary by the land owner.
- It is required that contractors have available [if there is cell phone reception] the emergency telephone numbers of the nearest local Fire Fighting Station and that an emergency firefighting re-action plan has been drawn up with onsite workers and the resident land-owner / farmer.

7.10.21 Emergency Procedures

It is the responsibility of the contractor to assess the potential risks to the environment as a result of the project. As such, the contractor must have the necessary standard emergency operating procedures in place to deal with any potential emergency such as oil spills or fire.

- All staff should be made aware of the necessary basic emergency procedures in the event of an emergency including injuries to staff. The appropriate equipment and identified personnel to deal with such basic emergencies should be available on site.
- **Fire:** The Contractor must advise the relevant authority of a fire as soon as one starts and must not wait until he can no longer control it. The Contractor must ensure that his employees are aware of the procedure to be followed in the event of a fire.
- **Hazardous Material Spills:** The Contractor must ensure that his employees are aware of the procedure to be followed for dealing with spills and leaks, which must include notifying the Engineer, the ECO and the relevant authorities. Treatment and remediation of the spill areas must be undertaken to the reasonable satisfaction of the ECO and Local Authority.

7.10.22 Solid waste management

Waste refers to all solid waste, including domestic waste, hazardous waste and construction debris. The Contractor are responsible for the establishment of a refuse control system (which must consider recycling wherever possible) that is acceptable to the ECO. Disposal arrangements must be made in advance and cleared with the ECO before construction starts.

- No littering or on-site burying or dumping of any waste materials, vegetation, litter or refuse may occur.
- All solid waste must be disposed of offsite at an approved landfill site in terms of section 20 of the Environment Conservation Act (Act No. 73 of 1989). The Contractor must supply the ECO with a certificate of disposal.
- The Contractor must provide problem animal- and weatherproof bins with lids of sufficient number and capacity to store the solid waste produced on a daily basis. The lids must be kept firmly on the bins at all times. Bins must not be allowed to become overfull and must be emptied regularly.
- Waste from bins may be temporarily stored on Site in a central waste area that is weatherproof and scavenger proof and which the Engineer and the ECO has approved.
- All hazardous waste must be disposed of at a registered hazardous waste disposal site and certificates of safe disposal must be obtained.

- All waste generated during the decommissioning and reconstruction activities must be removed by the Contractor as soon as possible, and within the period specified in the EMP and disposed of at a registered landfill site.
- The Contractor must make provision for workers to clean up the Contractor's camp and working areas on a daily basis so that no litter is left lying around and so that the site is in a neat and tidy state. The Contractor must remove from site the refuse collected at least once a week.

7.10.23 Toilets & Ablution Facilities

The Contractor must provide suitable sanitary arrangements at designated points of the construction site for all site employees. A minimum of one toilet must be provided per 15 persons at each working area (station) or as stipulated in the Management plan.

- The toilet must be within easy reach (max 300m) of the working area and be in good working condition and cleaned on a daily basis. Toilet paper must be provided. The toilets must be emptied on a weekly basis or when full or when instructed by the ECO on site.
- Disposal arrangements must be made in advance and cleared with the ECO before construction starts. Sanitation provision and servicing must be to the satisfaction of the ECO.
- The Contractor must ensure that toilets are emptied prior to any builders' holidays, and/or weekends.
- Toilets must be of a neat construction and must be provided with doors and locks and must be secured to prevent them blowing over.
- NB: No burying of any waste material on or near the construction site nor anywhere on the surrounding property is permitted.
- Eating areas that are allocated for workers must be established in an environmentally acceptable manner and in line with all OH & Safety Act regulations. All on site and on route workers temporary eating areas must be have acceptable toilet and refuse management systems in place and these areas must have suitable refuse receptacles' available for the containment and disposal of general litter and refuse.

7.10.24 Discharge of construction water

Potential pollutants of any kind and in any form must be kept, stored, and used in such a manner that any escape can be contained and the water table not endangered. This particularly applies to water emanating from runoff from fuel depots/workshops/truck washing areas.

- The contractor, being responsible for the construction and effective containment and maintenance of settlement ponds must ensure that the surrounding environment is not adversely affected as a result of construction activities.
- Wash down areas must be placed and constructed in such a manner so as to ensure that the surrounding areas are not polluted. Contaminated water includes water that is carrying excess sediment due to construction activities.
- Contaminated water storage facilities must not be allowed to overflow and appropriate protection from rain and flooding must be implemented.
- Contaminated water that is removed from site must be disposed of at a facility approved by the ECO and Local Authority.
- No contaminated water that does not meet the water quality standards and criteria under the National Water Act may be released into a natural system, whether it is to surface or groundwater.
- All cement effluent from mixer washings, and run-off from batching areas and other work areas must be contained in suitable sedimentation ponds.

- Sedimentation ponds must be allowed to dry out on a regular basis to allow for solid material to be removed.
- This material must be disposed of in a suitable manner, depending on the nature of the material, and to the discretion of the ECO

7.10.25 Treating (flushing / testing) of pipelines

Cleaning/sterilization/flushing of pipelines shall not impair surrounding environmental quality.

- Any contaminated water from such activities shall be contained until it complies with the standards contained in the National Water Act or other relevant Acts, as well as those laid down by the Local Authority.
- Alternatively, it shall be removed from site and disposed of at an approved waste disposal site.

7.10.26 Eating facilities

The Contractor must designate eating areas for the approval of the ECO, which must be clearly demarcated. No eating of meals must take place outside these designated areas without the approval of the Contractor/ESO.

- The feeding or leaving of food for animals is strictly prohibited.
- Sufficient waste bins must be present in this area and emptied regularly.
- The contractor must supply cooking facilities that are suitable for the environment and are not liable to cause the outbreak of fires.
- No overnight camping/stay on site allowed. If overnighting is necessary for security purposes then it must be cleared with the ECO on site.
- No washing in dams or streams are allowed.

7.10.27 Dust Control

The Contractor must take all reasonable measures to minimize the generation of dust as a result of construction activities resulting from along-construction-route activities (but must also take into account possible water constrictions of the area).

- The onsite construction site agent must take into account prevailing wind strength and wind direction and must have preventative measures on standby to minimize dust pollution that may cause damage to people and property.

7.10.28 Restoration and rehabilitation

The Contractor must ensure that all structures, equipment, materials and facilities used or created on site for or during construction activities are removed once the project has been completed. On completion of the project or phase, all areas impacted by the construction activities must be reinstated and/or rehabilitated to the satisfaction of the ECO with emphasis on the following:

- Immediately after the demolition of the camp site, the contractor shall restore the site to its original state, paying particular attention to its appearance relative to the general landscape.
- The contractor's procedure for rehabilitation shall be approved by the ECO and Engineer.
- Site offices must be removed and the areas rehabilitated or reinstated to the satisfaction of the ECO.

- Labourer's facilities (if applicable) must be removed and the areas rehabilitated or reinstated to the satisfaction of the ECO.
- All construction site areas must be rehabilitated or reinstated to the satisfaction of the ECO.
- All temporary fencing and demarcation must be removed and the areas reinstated to the satisfaction of the ECO.
- Temporary storage areas must be rehabilitated or reinstated to the satisfaction of the ECO.
- All remaining construction material must be removed and the areas rehabilitated or reinstated to the satisfaction of the ECO.

Any additional **disturbed** areas must be rehabilitated or reinstated to the satisfaction of the ECO. This shall include but not be limited to:

- Earthworks to reinstate the physical characteristics of the site. Here attention to the natural vertical and lateral heterogeneity in landform shall guide the reinstatement of natural areas.
- Replacement of topsoil material – care shall be taken to ensure that the same material that was removed from each area is replaced there, since this will carry the seed complement appropriate for re-establishment of each plant community type.
- Final landscaping by machine, but landscaping by hand may be required in many areas under rehabilitation.
- Re-seeding and / or replanting of rehabilitated areas.
- The Contractor shall not be permitted to use fertilisers or pesticides.
- It is imperative that any potential erosion problems are addressed. This may require subsequent site visits to monitor the efficacy of erosion control measures.

7.10.29 Land Management

- Vehicles accessing the construction site must be made aware of driving in hazardous road conditions, sharp bends, narrow roads, bad weather, on or near children or domestic animals along the road.
- Vehicle movements should be kept to a minimum during rain to avoid damage to access roads.
- No fences or gates on the relevant construction property must be damaged. All access gates to the property (construction site) to be kept closed at all times to prevent domestic and or wild animals from getting out. Access by unauthorised personnel should be controlled. The access gates to the construction areas must always be closed.
- Soil erosion must be prevented at all times along the access roads and around construction areas.

7.10.30 Socio-Cultural Issues

- Property owners or property occupiers must be treated with respect and courtesy at all times.
- The cultural lifestyles of the communities living in close proximity to the construction areas must be respected.

7.11 EMERGENCY PREPAREDNESS & RESPONCE

The following potential emergency situations have been identified and include the procedure for responding to, and for preventing and mitigating the environmental impacts that may be associated with them (also refer to Penalties and Fines).

7.11.1 Accidental fires

Fire safety in Fynbos Area is a very real risk and must be stringently controlled. No fires will be permitted on site for any reason. If required, a designated smoking area will be provided, and clearly demarcated and signposted, with a facility for safe containment and disposal of cigarette butts.

The following measures must be implemented:

- Adequate firefighting equipment must be available on site and in good working order (including at least one type ABC (all purpose) 2.5 kg fire extinguisher and 3 fire beaters per working area). The persons on site must be trained in the use of such equipment.
- The main contractor must provide a list of all authorities involved in firefighting in the region. This list must include emergency contact numbers and must be visible at the site office.
- The contractors must establish an emergency procedure (with contact numbers) to the satisfaction of ECO (whenever work is done in any fire prone areas).

7.11.2 Hydrocarbon spills

Since the project is in proportion relative small, no fuel storage or distribution facilities will be established. As a result the significance of any spill is much reduced. The following must be observed:

- Vehicles will arrive on site already fuelled for the project.
- If additional fuel is needed, it will be brought in as needed (minimal volumes) and refuelling will be done using a pump and not a funnel (to minimize the risk of spills).
- Spill trays shall be used during re-fuelling.
- In the case of accidental spillages or leakage, the contractor will be responsible for immediate containment and corrective action (e.g. stopping the leakage), and to inform the Construction Supervisor and ECO.
- The ECO will recommend the best possible environmental solution.
- The Contractor will be liable for any costs incurred.

7.11.3 Concrete/cement spillages

The Contractor/supplier will be liable for the safe and correct deliverance of substantial loads of concrete or cement.

- Should a spill occur the Contractor/supplier will be liable for all costs of the rehabilitation needed.

8. OPERATIONAL EMP (OEMP)

The most important part of the operational phase will be regular maintenance and emergency repair services. The applicant will be overall responsible for the environmental performance of the site and must be aware of the legal requirements and obligations. The applicant must also be aware of the legal action that can be taken against him as a person with regards to negligence leading to environmental pollution.

The applicant must implement an operational and maintenance management plan which must include:

Access management and control;
Energy management and control;
Water management supply and management;
Erosion management;
Waste and pollution management;
Fire Management;
Emergency plans which will cover all reasonable aspects regarding the operation of the property.

8.1 MAINTENANCE

The pipeline will require regular maintenance, which might include emergency repair works. In order to perform regular maintenance and repair work Sedibeng water will require suitable access to the pipeline and associated infrastructure. Maintenance and repair work will include:

- Regular monitoring and patrol of the pipeline.
- Excavation and replacement of portions of the pipeline (in case of leakages).
- Such work might include work within a watercourse or within 32m of a watercourse, but must be limited to the original construction corridor (approximately 30 m wide).

8.1.1 Access routes

The applicant must control access to the site and prevent unnecessary road establishment.

- Only existing approved access roads may be used for monitoring and maintenance purposes.
- No permanent new roads may be established unless approved by the applicable authority (DENC).
- Vehicles will adhere to municipal and provincial traffic regulations on all roads.

8.1.2 Energy management

All reasonable steps must be taken to ensure the efficient management of energy. Energy management and conservation measures must be propagated and encouraged even during regular monitoring and maintenance operations.

8.1.3 Water management

All reasonable efforts must be implemented to encourage and ensure the conservation and responsible use of drinking water and any other water used on site.

- Ensure that all water uses are correctly registered;
- Water conservation measures must be encouraged and implemented;

- Every reasonable effort must be made to reduce leakages and conserve water;
- Water monitor must be implemented (records must be kept).

8.1.4 Erosion & sediment control

Soil erosion (through wind & water) removes valuable top soil which is the most productive part of the soil profile (containing plant nutrients, seeds and bulbs). In accordance with the Conservation of agricultural Resources Act, 1983 (Act No. 43 of 1983) (CARA), the aim of erosion management is to prevent any form of soil erosion through proactive thinking and prevention as well as immediate rehabilitation.

In order to achieve erosion and sediment control, the following are applicable to all properties:

- Monitor, evaluate and implement erosion and sediment controls continuously;
- Install sediment catchment controls where needed;

8.2 WASTE & POLLUTION MANAGEMENT

An integrated waste management approach based on waste minimisation (e.g. reduction, recycling, re-use and disposal) must be implemented.

- No on-site burying or dumping of any waste materials, vegetation, litter or refuse are allowed;
- Domestic waste must be stored in approved containers (e.g. bins with removable lids);
- All solid waste must be disposed of at an approved Municipal landfill site.

8.2.1 Recycling

Whenever possible, a suitable recycle arrangement must be negotiated with a local recycle agent to ensure the re-use of recyclable material. Recycling should aim at sorting as much of the following materials as practical:

- Paper and cardboard
- Aluminium
- Copper
- Metals (other than aluminium and copper)
- Glass
- Organic waste
- Batteries
- Electronic equipment

8.2.2 Pollution management

All possible pollution sources must be identified and all reasonable steps taken to prevent pollution or accidental spillages.

- Ensure that all concentrated potential sources of pollution are protected (bunded) in order to minimise the risk of accidental spillage or pollution. Storage tanks should be bunded in such a way to contain at least 120% of the storage tank's capacity.

8.3 FIRE MANAGEMENT

Refer to emergency preparedness and response paragraph 8.6.

8.4 MINIMISE DUST AND AIR EMISSIONS

Refer to erosion and sedimentation control paragraph 8.1.4.

8.5 MANAGEMENT OF NATURAL AREAS

The objective regarding the management of natural areas are to identify critical or conservation worthy features and to manage such areas in such a manner as to promote sustainable biodiversity.

- Natural areas must be managed as close to natural as possible (no interference wherever possible).
- All listed invasive alien vegetation must be removed in accordance with CARA legislation (The Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983)) as revised.

8.6 EMERGENCY PREPAREDNESS AND RESPONSE

The following potential emergency situations have been identified and include the procedure for responding to, and for preventing and mitigating the environmental impacts that may be associated with them.

8.6.1 Accidental fires

Adequate firefighting equipment according to the fire hazard during the construction period must be available on site and in good working order (at least one type ABC (all purpose) 2.5 kg extinguisher and 3 fire beaters per working area). The persons on site must be trained in the use of such equipment.

- No open fires will allowed as part of maintenance, monitoring or emergency repairs.
- Hot works like, welding, gas cutting or cutting of metal may only be permitted if adequate firefighting equipment is available on site.
- The applicant must establish an emergency firefighting re-action plan in co-operation with local fire fighting.

APPENDIX 1: ENVIRONMENTAL AUTHORIZATION

APPENDIX 2: START-UP REPORT

To be included after start-up meeting.

APPENDIX 3: ENVIRONMENTAL EDUCATION

ENVIRONMENTAL TRAINING FOR CONSTRUCTION.

The why, what and how…

BUT WHY…

… should we care about the environment?

The environment provides us with everything we need to survive – food, water, fuel, air, etc. Human activity uses resources and has an impact on those resources. Managing our resource use and ensuring that our impact is minimized will ensure that these resources are not depleted.

The Constitution says that all people in South Africa have the right to a healthy environment. If you damage the environment, you are taking away that basic right of others as well as future generations – your children and grandchildren!

…environmental management if there is already conservation?

Historically, development and environmental conservation have been in conflict, because conservation was understood as the protection of resources, and development as the use, or exploitation of resources. The two competed for the same resources, but both are needed! Enter: *SUSTAINABLE DEVELOPMENT.*

> Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs.

Sustainable development thus aims to improve the quality of human life while living within our ecological means = the wise use of resources!

…environmental management of construction?

South Africa's effort to attain sustainable development is based on the concept of Integrated Environmental Management (IEM). The purpose of IEM is to resolve or lessen any negative environmental impacts and to enhance positive aspects of development.

IEM is designed to ensure that the environmental consequences of development proposals are understood and adequately considered in the planning, implementation and management of all developments.

It is intended to guide, rather than impede the development process by providing a method of gathering, analysing and utilising information about the environmental impacts of development. IEM and other principles of Environmental Management are set out in the National Environmental Management Act (No. 107 of 1998) & National Environmental Management Amendment Act (No. 62 of 2008)

BUT WHAT…

…exactly is the 'environment'? What if we're not working near rivers or fynbos or leopard toad habitat?

The environment is not only the 'conservation-worthy' such as rare plants and endangered animals. The environment is everything around you!

It is made up of living things (e.g. people, plants & animals) and non-living things (e.g. soil, water, buildings & cars). People and man-made things are also important parts of the environment.

Protection of the environment means that all living and non-living things are protected. During construction, Environmental Management Programmes (EMP's) are implemented not only to protect fynbos or leopard toads but also to protect people (both on site and off), property (houses, cars, etc.) as well as natural resources such as water, air and soil.

...do Environmental Management Programmes (EMP's) do? What does this mean for my contract?

EMPs are tools to facilitate environmental management during the construction phase of development projects and thereby avoid *unnecessary* impacts to the environment.

In the past, the functionality and efficiency of EMPs was hampered by resistance from contractors and engineers, the difficulties of costing for compliance and the lack of legal enforceability.

Now Environmental Management Programmes (EMP's) are stipulated in the Environmental Authorisations (ROD) as a condition of the approval to go ahead with the development, in other words it is *legally binding.*

When you sign a contract do work on a project with an EMP, you are legally bound to comply with that EMP!

Methods of implementing EMPs are becoming more and more stringent and issues of enforceability are being addressed. Those individuals and companies that are familiar with compliance with EMPs will be at a competitive advantage!

...do EMPs consist of?

EMPs usually contain an environmental policy statement, organisational structure detailing the responsibilities and authorities involved in the project, procedures for communication and record-keeping and environmental specifications.

EMPs are adapted to the scale and sensitivity of the construction project. They can be thick documents detailing specifications for every eventuality specifically adapted to the project, or they can be short and brief documents setting out standard environmental procedures and controls. Sometimes EMPs include extensive penalty and incentive schemes.

A WORD ON METHOD STATEMENTS:

A method statement can be requested or proposed when an activity is either not included in the EMP at all, if the EMP specifications for an activity are not deemed adequate, if an activity is required that is not allowed by the EMP, etc. In other words, when the EMP does no give enough information to manage the environmental impact of a specific activity.

A method statement is defined as a written submission by the Contractor setting out the plant, materials, labour and method proposed to carry out an activity. Method statements must provide enough detail that the environmental impact of the activity can be assessed. Method statements must therefore be submitted well in advance of the activity (usually at least 5 days but sometimes more).

Method statements are therefore an extension of the EMP, are also legally binding and are intended to ensure that the environmental implications of an activity outside of the EMP can be addressed.

Method statements usually require the approval by the engineer, the ECO/ESO/DEO, etc. before the activity can take place. If such an activity takes place without approval and result in environmental damage, the contractor is responsible for the cost of rehabilitation/clean-up/etc.

...is an ECO, ESO, DEO, etc.?

EMPs usually require the appointment of an ECO, ESO, DEO, etc. to oversee the implementation of and compliance with the EMP on behalf of the engineer or the contractor(s). Ultimate responsibility for compliance with the EMP lies with the contractor(s) and the engineer.

ESO = Environmental Site Officer – usually on site permanently or often. Can be independent consultant or from contractor/engineer.

ECO = Environmental Control Officer – usually visits site on a regular basis and audits compliance with the EMP. Usually independent consultant.

DEO = Designated Environmental Officer – usually on site permanently, usually member of contractor or engineer site staff.

Organisational structures and responsibilities differ from project to project and depend on environmental sensitivity of the project, scale of the project, etc. Increasingly nowadays, each party is required to appoint their own person responsible for environmental management on site, e.g. the engineer would have an ESO/ECO and the main contractor(s) would have an ESO/DEO etc.

It is therefore important to familiarise yourself with that part of the EMP that deals with organisation and responsibilities for each contract that you are involved in.

BUT HOW...

...do EMPs promote sustainable development?

They don't!

It is the people on site that protect the environment. The EMP, like any other plan or policy, is not worth anything if there isn't a commitment from those working on the project to compliance with the EMP.

...can I ensure my work comply with the EMP?

Environmental specifications in different EMPs can vary from vague to very detailed.

- Firstly, it is obviously important to know what those specifications are, vague or not, so READ THE DOCUMENT! Ignorance does not absolve you from your responsibility. A copy of the EMP must be kept at the site office at all times.
- It also helps to understand WHY those specifications are there – some things are obvious but others may not be. Some EMPs may have specifications that are not relevant. Don't be afraid to question the EMP; it can only increase its efficiency!
- Know where the sensitive areas on site are – watercourses, wetland areas, residential areas, etc. – and be extra vigilant when working in these areas.

Mostly environmental management of construction activities and compliance with EMPs require only common sense and with good housekeeping the battle is half won!

The enclosed environmental hand-out sets out the standard environmental specifications

DO'S AND DON'TS (1)

Workers & equipment must stay inside the site boundaries at all times.
Nobody may enter areas marked as No-go areas.

Why? Construction activities, equipment and people cause damage and disturbance to the area surrounding the site. As small an area as possible will be affected if all workers and equipment stay within the site boundaries. This is especially important if there are people who live around the site or natural areas around the site which should not be disturbed.

Do not swim in or drink from streams.
Do not throw oil, petrol, diesel, concrete or rubbish in streams.
Do not work in the stream without direct instruction.
Do not damage the banks or plants of streams.

Why? River water may be polluted which could make you sick.
Oil, petrol, diesel, concrete or rubbish will kill plants and animals living in the water. They may also make people who may drink the water downstream sick. Rubbish in the stream also makes it look ugly.
People and machinery working in the stream will damage it and kill plants and animals living in the stream. It may also cause erosion, which is expensive to repair.
The plants on the edge of the stream bind the soil together and prevent soil from getting washed away. Soil washed into a stream may affect people using the water downstream (e.g. for irrigation).

Protect animals on the site.
Ask your supervisor to remove animals found on site.

Why? Animals are an important part of the environment. All animals have a purpose, even snakes which catch mice and rats. Other important animals are owls, chameleons and frogs.

Do not damage or cut down any trees or plants without permission.
Do not pick flowers.

Why? Some plants are rare and may take a long time to grow back, if at all. Plants in the "no go" areas should not be damaged.
Some plants will die if their flowers are picked. Rare plants may be lost.

Put cigarette butts in a rubbish bin.
Do not smoke near gas, paints or petrol.
Do not light any fires without permission.
Know the positions of firefighting equipment.
Report all fires.
Do not burn rubbish/ vegetation without permission.

Why? Leaving a burning cigarette butt on the ground may lead to runaway fires which are dangerous to construction workers, people living around the site, equipment, houses, plants and animals.
Smoking near flammable material is dangerous and may cause an explosion.
Lighting a fire without permission may cause a runaway fire (see above).
Reacting quickly to fires that break out will prevent them from spreading and causing damage.

DO'S AND DON'TS (2)

Work with petrol, oil & diesel only in designated areas.
Report any petrol, oil & diesel leaks or spills.
Use a drip tray under vehicles & machinery.
Empty drip trays after rain & throw away were instructed.

Why? Designated areas should have measures to protect against petrol, oil & diesel spills. Oil, petrol and diesel can drip onto the soil and soak into it. Plants will not grow and animals will not live in dirty soil. It also looks ugly to people living around the area.
Drip trays will prevent oil, petrol or diesel from soaking into the soil and killing plants and animals.
If drip trays are not emptied they may overflow and pollute the surrounding soil. If oil, petrol or diesel is put into a stream, plants and animals living in the stream will be killed. They may also make people who may drink the water downstream sick. Ask your supervisor where drip tray water may be disposed of on site.

Try to avoid producing dust – wet dry ground and stockpiles.

Why? Dust can be irritating to people and can reduce production on site. It can cause problems such as eye irritations and coughs. It also reduces visibility on and around the site, which can be dangerous to drivers and pedestrians, and can cause damage to the surrounding environment.
Soil should not be made too wet because that will cause safety problems and soil may be washed away.

Do not make loud noises around the site, especially near schools and homes.
Report or repair noisy vehicles.

Why? Loud noises are irritating to workers and people living around the site. Loud noise can also be harmful to people (especially children) and affect their hearing.
By keeping vehicles in good condition, loud noise can be prevented.

Use the toilets provided.
Report full or leaking toilets.

Why? Sewage attracts flies and other irritating pests. If the site is near a river or stream, sewage makes the water smell and people who swim in it or use it to wash their clothes will get sick. It also causes plants to grow too much which blocks the river, which may cause flooding of houses and property.
Regular emptying of toilets is hygienic and will also prevent overflows.

Make sure that you eat where there is a rubbish bin nearby.
Never eat near a river or stream.
Put packaging & leftover food into rubbish bins.

Why? Eating areas generate a lot of rubbish and litter (e.g. bottles and packets) which will pollute the site and surrounding areas. Therefore, eating must be done near bins which are placed in the eating.

Rubbish in a stream looks ugly and can be harmful to people's health. It may also kill the plants and animals living in the stream. Rubbish and food left lying around will attract pests (such as rats) which are dangerous to people and cause a health hazard. Also, rubbish left lying around is ugly and unpleasant to look at.

Do not litter–put all rubbish (especially cement bags) into the bins provided.
Ask your supervisor for a bin if there is none. Bins must be provided.
Report full bins to your supervisor.
The responsible person should empty bins regularly.

Why? Litter is ugly. It is also dangerous and unhealthy to adults, children and animals walking around the area. Not putting the lid back on the bin will cause rubbish to be blown away.
Regularly emptying bins will prevent litter and rubbish flying around the site.

Always keep to the speed limit.
Drivers - check & report leaks.
Ensure loads are secure & do not spill.

Why? Speeding is dangerous to people who live in the area, especially children. Speed kills!
Faulty vehicles are dangerous to the driver, pedestrians and other motorists. Leaks can also pollute the ground and water and smoke from vehicles can cause health problems.
This is a potential danger to other motorists. Also, do not overload vehicles.

Know all the emergency phone numbers.

Why? Prompt reaction to an accident, fire or spill will reduce the risk of serious damage to the environment and to workers.

<u>If rules are broken:</u>
- Spot fines
- Removal from site.
- Construction may be stopped.

Why? Failure to adhere to the EMP may result in spot fines being issued to the company. It is then the Site Agent's responsibility to collect these fines from guilty individuals and he may even deduct fines off your wages.
The fines are meant to act as an incentive for workers to take the EMP seriously.
A person may be removed from site if they continually disregard the specifications in the EMP.
If the EMP is not adhered to, the local Environmental Authority may stop construction.

Report any breaks, floods, fires, leaks and injuries to your supervisor.

Ask questions!

Thank you for your attention.

APPENDIX 4: BASIC RULES OF CONDUCT

BASIC RULES OF CONDUCT

The following list represents the basic Do's and Don'ts towards environmental awareness, which all participants in this project must consider whilst carrying out their tasks. These are not exhaustive and serve as a quick reference aid.

NOTE: **ALL new site personnel must** attend an environmental awareness presentation. Please inform your foreman or manager if you have not attended such a presentation or contact the ESO.

DO:

- Use the toilet facilities provided – report dirty or full facilities
- Clear your work areas of litter and building rubbish at the end of each day – use the waste bins provided and ensure that litter will not blow away.
- Report all fuel or oil spills immediately & stop the spill continuing.
- Dispose of cigarettes and matches carefully. (Littering is an offence.)
- Confine work and storage of equipment to within the immediate work area.
- Use all safety equipment and comply with all safety procedures.
- Prevent contamination or pollution of streams and water channels.
- Ensure a working fire extinguisher is immediately at hand if any "hot work" is undertaken e.g. welding, grinding, gas cutting etc.
- Report any injury of an animal.
- Drive on designated routes only.
- Prevent excessive dust and noise.

Do not:

- Remove or damage vegetation without direct instruction.
- Make any fires.
- Injure, trap, feed or harm any animals – this includes birds, frogs, snakes, lizards etc.
- Enter any fenced off or marked area.
- Allow cement or cement bags to blow around.
- Speed or drive recklessly
- Allow waste, litter, oils or foreign materials into the stream
- Swim in the dam.
- Litter or leave food laying around

Notes:

If any animals such as tortoises, chameleons or snakes be encountered then do not harm them. The ECO or Site Supervisor must be contacted to remove these safely. The harming of any animal will result in disciplinary action.

Construction and heavy machine operators must be particularly sensitive to staying within access routes and prevention of unnecessary damage. Dust and noise is also of particular concern. Ensure that vehicles and machinery do not leak fuel or oils. Refuelling or maintenance must be done within the maintenance camp area only.

Alien plant clearing and control work teams must be closely supervised.

BASIESE GEDRAGSKODES

Die volgende lys verteenwoordig die moets en moenies vir omgewingsbewustheid wat alle deelnemers aan hierdie projek in ag moet neem tydens die uitvoer van hul take. Hierdie lys is nie volledig nie en dien slegs as 'n vinnige verwysing.

Nota: **alle nuwe terreinpersoneel moet** 'n aanbieding ten opsigte van omgewingsbewustheid bywoon. Indien u nog nie so 'n aanbieding bygewoon het nie, lig asseblief u voorman of bestuurder in of kontak die omgewings terreinbeampte.

Moets:

- Gebruik die beskikbare toilet-geriewe – rapporteer vuil of vol geriewe.
- Maak u werkplek skoon van rommel of bourommel aan die einde van elke dag – gebruik beskikbare vullisdromme en verseker dat rommel nie rondwaai nie.
- Rapporteer alle brandstof- en olie stortings onmiddellik – stop verdere storting.
- Wees versigtig met die wegdoen van sigarette en vuurhoutjies. (rommelstrooi is 'n oortreding.)
- Beperk werkaktiwiteite en die stoor van toerusting tot die onmiddellike werkarea.
- Gebruik veiligheidstoerusting en voldoen aan alle veiligheids-maatreëls.
- Voorkom besoedeling van strome en waterbane
- Verseker dat 'n brandblusser in werkende toestand byderhand is wanneer "warm" werk verrig word bv. Sweis, wegslyp, gasny, ens.
- Rapporteer beseerde diere.
- Ry slegs op aangewese roetes.
- Voorkom oormatige stof en geraas.

Moenie:

- Plantegroei verwyder of beskadig sonder direkte instruksie nie.
- Enige vure maak nie.
- Enige diere dood, beseer, vang of voer nie, insluitende voëls, paddas, slange, akkedisse, ens.
- Enige omheinde of afgesperde areas binnetree nie.
- Sement of sementsakke laat rondwaai nie.
- Vinnig of roekeloos bestuur nie.
- Enige rommel, afval, olie or enige vreemde materiaal in strome laat beland nie.
- In die dam swem nie.
- Rommelstrooi of kos laat rondlê nie.

Notas:

Indien enige diere soos skilpaaie, verkleurmannetjies of slange teëgekom word, moet hulle nie beseer of dood nie. Kontak die otb of ri om hulle veilig te verwyder. Die besering van diere sal lei tot dissiplinêre optrede.

Operateurs van konstruksie- en swaar masjiene moet veral versigtig wees om binne toegangsroetes te bly en om enige onnodige skade te voorkom. Verseker dat voertuie en masjiene nie olie of brandstof lek nie. Brandstofaanvulling en voertuigonderhoud mag slegs binne die onderhoudsarea gedoen word.

Streng toesig moet gehou word oor indringerplantbeheerspanne.

EZIPPHAMBILI EKUNYANZELEKILEYO UKUBA ZENZIWE

Zonke ezi zinto zilandelayo zizinto ekufuneka zenziwe nekufuneka zingenziwanga.

Wonke umntu ofikayo kufuncka afundiswe ngemigaqo kupala. Needa yazisa iforman yakho ikuba awukhange uye kufundiswa.

Izinto emazenziwe

- Sebenzisa izindlu zangasese, yazisa xa kukho umonakalo.
- Zama ukucoca apho ubusebenza khona.
- Sebenzisa imigqomo yenkukuma ungayeki iphaphtieke.
- Yazisa xa ubona ioil echithskalayo okanye ipetrol.
- Cima lozoli cigarette xa ugqibibile ukutshaya
- Zonke izixhobo usebenza zibuyisele apho zihlaka khona xa ucgibile apho zihlala khona xa ugqibile ukuzisebenzisa.
- Zisebenzise izikhuselixa uzinkiwe.
- Sukugalela izinto emlanjeni.
- Masibekho isicima mlilo xausebenza ngomlilo.
- Yazisa msinyane xa ubone isilwanyana ezonzakeleyo.
- Xauqhuba isithuthi hamba endleleni qha ungafathulinje.
- Naphina zamaungenzi thuli okanye ingxolo xa usebenza.

Emazingenziwa

- Sukususa nesiphina isityalo ungakhange uxelelwe
- Sukwenza mlilo nokuba sekubanda
- Amagqara ukubulala izilwanyana nokuzifida akuvumelekanga
- Sukungena xa kuvaliwe ngaphandle kwe mvume
- Ingxowa zesamente mazincedwe zingalahlwa nje
- Sukuqhuba ngesantya esiphakamileyo
- Sukugalele nayiphi into phaya emlanjeni
- Sukuqubha edameni q oqosha yonk inkukuma

APPENDIX 5: INFO ON METHOD STATEMENTS

INFORMATION ON METHOD STATEMENT

Method Statements are to be completed by the person undertaking the work (i.e. the Contractor). The Method Statement will enable the potential negative environmental impacts associated with the proposed activity to be assessed.

The Method Statement can only be implemented once approved by the ECO

The Contractor (and, where relevant, any sub-contractors) must also sign the Method Statement, thereby indicating that the works will be carried out according to the methodology contained in the approved Method Statement.

The ECO will use the Method Statement to audit compliance by the Contractor with the requirements of the approved Method Statement.

Changes to the way the works are to be carried out must be reflected by amendments to the original approved Method Statement; amendments require the signature of the ECO denoting that the changed methodology or works are necessary for the successful completion of the works, and are environmentally acceptable. The Contractor will also be required to sign the amended Method Statement thereby committing him/herself to the amended Method Statement.

This Method Statement MUST contain sufficient information and detail to enable the ECO to apply their minds to the potential impacts of the works on the environment. The Contractor will also need to thoroughly understand what is required of him/her in order to undertake the works.

THE TIME TAKEN TO PROVIDE A THOROUGH, DETAILED METHOD STATEMENT IS TIME WELL SPENT. INSUFFICIENT DETAIL WILL RESULT IN DELAYS TO THE WORKS WHILE THE METHOD STATEMENT IS REWRITTEN TO THE ER'S AND ESO'S SATISFACTION.

The page overleaf provides a *pro forma* method statement sheet, which needs to be completed for each activity requiring a method statement in terms of the EMP.

APPENDIX 6: EXAMPLE OF METHOD STATEMENT

CONTRACT:..... **DATE:**.....

PROPOSED ACTIVITY (give title of method statement and reference number):

WHAT WORK IS TO BE UNDERTAKEN (give a brief description of the works):

WHERE ARE THE WORKS TO BE UNDERTAKEN (where possible, provide an annotated plan and a full description of the extent of the works):

START AND END DATE OF THE WORKS FOR WHICH THE METHOD STATEMENT IS REQUIRED:

Start Date:

End Date:

HOW ARE THE WORKS TO BE UNDERTAKEN (provide as much detail as possible, including annotated maps and plans where possible):

Note: please attach extra pages if more space is required

DECLARATIONS

1) ENVIRONMENTAL CONSULTANT AND/OR ENVIRONMENTAL CONTROL OFFICER

The work described in this Method Statement, if carried out according to the methodology described, is satisfactorily mitigated to prevent avoidable environmental harm:

_____ _____

(Signed) (Print name)

_____ _____

(Signed) (Print name)

Dated: _____

2) PERSON UNDERTAKING THE WORKS

I understand the contents of this Method Statement and the scope of the works required of me. I further understand that this Method Statement may be amended on application to other signatories and that the ESO will audit my compliance with the contents of this Method Statement

_____ _____

(Signed) (Print name)

Dated: _____

3) THE APPLICANT

The works described in this Method Statement are approved.

_____ _____ _____

(Signed) (Print name) (Designation)

Dated: _____

APPENDIX 7: CONTRACTOR ENVIRONMENTAL CHECKLIST

CONTRACTOR/S REPRESENTATIVE: ENVIRONMENTAL WEEKLY CHECKLIST

SITE: _____

PHASE OF WORK AND % OF COMPLETION: _____

ENVIRONMENTAL ASPECT	YES/ NO (✓ or X)	COMMENTS
How many workers are on site		
All new personnel on site are aware of the contents of the EMP and have been through the environmental awareness course.		
Contractor's camp is neat and tidy and the labourers' facilities are of an acceptable standard.		
Sufficient and appropriate firefighting equipment is visible and readily available.		
Waste control and removal system is being maintained.		
Refuse bins in place and maintained		
Toilets are in place and clean		
Demarcation and other fences are being maintained.		
What machinery are on site		
Drip trays are being utilised where there is a risk of incidental spillage		
Bunds/ drip trays are being emptied on a regular basis (especially after rain).		
No leakages (oil & fuel) are visible from construction vehicles		
No go areas, remaining natural features and trees have not been damaged.		
Dust control measures (if necessary) are in place and are effectively controlling dust.		
Noise Control measures (if necessary) is in place and is working effectively.		
Erosion control measures (if necessary) are in place and are effective in controlling erosion. (Access road, site areas etc.)		
Stockpiles are located within the boundary of the site, do not exceed 2 m in height and are protected from erosion.		

Completed by:..... **Sign:**..... **Date:**.....

To be submitted at the end of each week to the Environmental Site Officer (ESO)

Received by:

Environmental Site Officer: :..... **Sign:** **Date:**.....

APPENDIX 8: ECO/ESO REPORT/CHECKLIST

ECO CONSTRUCTION SITE ENVIRONMENTAL INSPECTION REPORT

Project Name: _____ **Report no** _____

Main Contractor: _____ **Date** _____

ECO: _____ **EnviroAfrica Ref. no.** _____

ENVIRONMENTAL ASPECT	RATING	FINDINGS & RECOMMENDATIONS
RATING: 1 = EXTREMELY POOR 2 = POOR 3 = AVERAGE 4 = GOOD 5 = EXCELLENT		
1. **DEMARCATION** Boundaries of "no go" areas, construction sites, -offices, temporary storage areas as well as labourer's facilities must be demarcated (EMP and ECO requirements) and maintained for the length of the construction period.		
2. **NO-GO AREAS** Identified "No-Go Areas", must be demarcated for protection from construction damage (including secondary impact). • All areas outside of the demarcated construction site(s) and access road(s) to be regarded as NO-GO areas, including remaining natural veld identified trees. • Special attention to identified areas with significant vegetation.		
3. **SEARCH & RESCUE** All flora identified for search & rescue must be removed before any construction take place and re-used in pre-approved way.		
4. **VEGETATION & TOPSOIL REMOVAL** Before any construction or earthworks, topsoil must be stripped (>150mm) and stockpiled for rehabilitation/ landscaping. Stockpiles: • must be protected (erosion) and stored separately. • may not be moved further than 50m or mixed with any other soil. • must be convex and should not exceed 2m in height. In addition: • Cleared areas must be stabilized. • Burning or burying of cleared vegetation is prohibited (may be used for mulch or slope stabilisation on site).		
5. **CONSTRUCTION CAMP & SITE OFFICES** Must be demarcated, organised and free of day-to-day litter (good housekeeping standards).		

ENVIRONMENTAL ASPECT	RATING	FINDINGS & RECOMMENDATIONS
RATING: 1 = EXTREMELY POOR 2 = POOR 3 = AVERAGE 4 = GOOD 5 = EXCELLENT		
6. **LABOURER'S FACILITIES** Facilities must be of acceptable standards suitably demarcated, well maintained, neat and tidy and with adequate ablution facilities.		
7. **ENTRANCE AND HAUL ROADS** Only approved entrance and haul roads may be used. No new roads or parking areas may be developed without written approval from the ECO.		
8. **MANDATORY SITE EQUIPMENT** Mandatory site equipment must be in place, well maintained and in accordance with EMP and ECO requirements. • Sufficient refuse bins, well placed and cleaned regularly. • Sufficient fire extinguishers, readily available, maintained and functional. • Drip trays must be used at all fuel and oil storage and refuelling sites. • Toilets and sanitation facilities must be kept clean neat and hygienic.		
9. **FUEL STORAGE** Fuel storage areas must be situated within the demarcated construction camp site (or an area approved by the ECO). • Larger containers must be bunded (containment of accidental spillages). • Drip trays must be used during refuelling or under stationary refuelling vehicles. • Fuel and oil storage and refuelling sites must be maintained.		
10. **STOCKPILING & TEMPORARY STORAGE** May only be placed on pre-approved sites, demarcated, stabilised or organised and neat.		
11. **WASTE CONTROL** The contractor is expected to control all construction related waste material and general litter on actual construction sites and its immediate surroundings. • Waste management must be in accordance with the EMP, of acceptable standards, with regular removal of general waste, hazardous waste as well as construction waste (e.g. concrete waste and spoil).		
12. **CEMENT MIXING & BATCHING AREAS** Mixing areas must be approved by the ECO, suitably demarcated and may not result in pollution. • Polluted cement water may only be released into sedimentation ponds.		

ENVIRONMENTAL ASPECT	RATING	FINDINGS & RECOMMENDATIONS
RATING: 1 = EXTREMELY POOR 2 = POOR 3 = AVERAGE 4 = GOOD 5 = EXCELLENT		
• Sedimentation ponds must be maintained and cleaned regularly (and reinstated after use).		
13. **CONSTRUCTION VEHICLE MAINTENANCE** Construction vehicles must be in good working order and well maintained to prevent oil and fuel leakages and to reduce noise levels.		
14. **HEAVY EARTHMOVING EQUIPMENT** Construction vehicles and equipment may only operate within the demarcated site boundaries (and approved access roads), especially heavy earthmoving vehicles.		
15. **DUST CONTROL** Adequate control measures must be in place to prevent dust nuisance or pollution (entrance-, haul roads and exposed surfaces). • Areas of concern must be watered regularly during construction AND periods of strong winds, BUT must take water saving into account.		
16. **EROSION CONTROL** Erosion resulting from works must be controlled. • Temporary and permanent drainage areas must be maintained. • Erosion damage and damage in drainage courses must be reinstated.		
17. **NOISE CONTROL** Effective noise control measures must be in place and acceptable working hours must be kept (deviations must be approval by the ECO).		
18. **ARCHAEOLOGICAL & HERITAGE FINDS** Should any archaeological or heritage remains be exposed during excavations or any activity on site, these must immediately reported to The site agent/engineer, the ECO HWC or SAHRA.		
19. **METHOD STATEMENTS** Method statements must be submitted and approved before commencement of the works. **Possibly Required:** 1. Demarcation & No-Go Areas (Map) 2. Clearing of vegetation & topsoil conservation 3. Stockpiling & temporary storage 4. Construction camp & site offices		

ENVIRONMENTAL ASPECT	RATING	FINDINGS & RECOMMENDATIONS
RATING: 1 = EXTREMELY POOR 2 = POOR 3 = AVERAGE 4 = GOOD 5 = EXCELLENT		
5. Labourer's facilities 6. Mandatory site equipment 7. Fuel storage 8. Entrance & haul roads 9. Waste management 10. Cement/Concrete mixing 11. Dust control 12. Erosion control 13. Noise control 14. Rehabilitation **Additional Method Statements**		
20. **ENVIRONMENTAL CONDUCT** Environmental conduct of construction personnel must be acceptable (e.g. no burning or burying of refuse; no littering and no cement bags or other construction waste material lying around).		
21. **ENVIRONMENTAL CHECKLIST** The contractor must ensure that the weekly environmental checklist is completed at the end of each week and it must be available at the site offices.		
22. **REHABILITATION** On completion of the project or phase, all areas impacted by the construction activities must be reinstated and/or rehabilitated to the satisfaction of the ECO with emphasis on the following: • Site offices must be removed and the areas rehabilitated or reinstated to the satisfaction of the ECO. • Labourer's facilities must be removed and the areas rehabilitated or reinstated to the satisfaction of the ECO. • All construction site areas must be rehabilitated or reinstated to the satisfaction of the ECO. • All temporary fencing and demarcation must be removed and the areas reinstated to the satisfaction of the ECO. • Temporary storage areas must be rehabilitated or reinstated to the satisfaction of the ECO. • All remaining construction material must be removed and the areas rehabilitated or reinstated to the satisfaction of the ECO. • Any additional disturbed areas must be rehabilitated or reinstated to the satisfaction of the ECO.		

ENVIRONMENTAL ASPECT	RATING	FINDINGS & RECOMMENDATIONS
RATING: 1 = EXTREMELY POOR 2 = POOR 3 = AVERAGE 4 = GOOD 5 = EXCELLENT		
23. **SPOT FINES & PENALTIES** Spot fines and penalties must be recorded and documented by the ECO (in accordance with the EMP).		
24. **FIXED POINT PHOTOS** Photographs must be taken by the ECO, Site Engineer and or Site Manager, prior to, during and immediately after construction as visual reference. These photographs must be stored with other records relating to the EMP.		

ECO COMMENTS

End of report

ECO Signature

APPENDIX 9: Environmental incident report format

ENVIRONMENTAL INCIDENT REPORT

No. _____

PROJECT NAME			
PROJECT LOCATION			
SITE AGENT			
DATE OF INCIDENT		TIME	

BRIEF DESCRIPTION AND CAUSE OF INCIDENT:

WHAT IMMEDIATE ACTIONS / CONTROL MEASURES WERE TAKEN:

WHAT CORRECTIVE ACTIONS WERE TAKEN TO ENSURE NO REPEATS OF THE INCIDENT:

ECO/ESO RESPONSE TO INCIDENT AND RECOMMENDATIONS:

IS THIS INCIDENT A: ☐ FIRST OFFENCE ☐ SECOND OFFENCE ☐ THIRD OFFENCE

SIGNATURE OF SITE AGENT: _____ **DATE** _____

SIGNATURE OF ECO/ESO _____ **DATE** _____

REMEMBER TO BE FACTUAL WHEN DESCRIBING THE INCIDENT

APPENDIX 10: Environmental complaints register

COMPLAINTS REGISTER FORM

(To be completed by Site Agent/Supervisor)

NO.	DATE	NAME OF COMPLAINANT	CONTACT NO.	NATURE OF COMPLAINT	ACTION TAKEN TO RECTIFY COMPLAINT

APPENDIX 11: Method statement register

METHOD STATEMENT REGISTER		SITE AGENT:			PROJECT NAME:		
		CONTRACTOR:			PROJECT LOCATION:		
No.	METHOD STATEMENT ACTIVITY REFERENCE	DATE CREATED	DATE RECEIVED	CREATED BY	ACCEPTED / REJECTED	DATE APPROVED	APPROVED BY
1	Demarcation						
2	Clearing of vegetation and topsoil removal						
3	Stockpiling						
4	Temporary storage facilities						
5	Construction camp and site offices						
6	Fuel storage						
7	Labourer's facilities						
8	Entrance and haul roads						
9	Mandatory site equipment						
10	Waste management/control						
11	Cement mixing and batching areas						
12	Construction vehicle maintenance						
13	Dust control						
14	Erosion control						
15	Noise control						
16	Archaeological and heritage finds						
17	Rehabilitation						
18							

APPENDIX 12: Maps & Drawings

APPENDIX 13: Other information

APPENDIX 14: Proof of compliance

APPENDIX H

DETAILS OF EAP AND EXPERTISE

RELEVANT QUALIFICATIONS & EXPERIENCE OF THE EAP

Mr. Peet Botes holds a BSc. (Hons.) degree in Plant Ecology from the University of Stellenbosch (Nature Conservation III & IV as extra subjects). Since qualifying with his degree, he had worked for more than 20 years in the environmental management field, first at the Overberg Test Range (a Division of Denel) managing the environmental department of OTB and being responsible for developing and implementing an ISO14001 environmental management system, ensuring environmental compliance, performing environmental risk assessments with regards to missile tests and planning the management of the 26 000 ha of natural veld, working closely with CapeNature (De Hoop Nature Reserve). In 2005 he joined Enviroscientific, an independent environmental consultancy specializing in wastewater management, botanical and biodiversity assessments, developing environmental management plans and strategies, environmental control work as well as doing environmental compliance audits and was also responsible for helping develop the biodiversity part of the Farming for the Future audit system implemented by Woolworths. During his time with Enviroscientific he performed more than 400 biodiversity and environmental legal compliance audits. During 2010 he joined EnviroAfrica in order to move back to the biodiversity aspects of environmental management. Experience with EnviroAfrica includes EIA applications, biodiversity assessment, botanical assessment, environmental compliance audits and environmental control work.

Mr. Botes is also a registered Professional Botanical, Environmental and Ecological Scientists at SACNASP (South African Council for Natural Scientific Professions) as required in terms of Section 18(1)(a) of the Natural Scientific Professions Act, 2003, since 2005.

INDEPENDENCE & CONDITIONS

EnviroAfrica is an independent consultant and has no interest in the activity other than fair remuneration for services rendered. Remunerations for services are not linked to approval by decision making authorities and EnviroAfrica have no interest in secondary or downstream development as a result of the authorization of this proposed project. There are no circumstances that compromise the objectivity of this report. The findings, results, observations and recommendations given in this report are based on the EAP's best scientific and professional knowledge and available information. EnviroAfrica reserve the right to modify aspects of this report, including the recommendations if new information becomes available which may have a significant impact on the findings of this report.

Yours sincerely,

P.J.J. Botes *(Pr.Sci.Nat: 400184/05)*
Registered Professional Environmental and Ecological Scientist