

ALIEN INVASIVE AND OPEN SPACE MANAGEMENT PLAN

1. PURPOSE

Invasive alien species pose the second largest threat to biodiversity after direct habitat destruction. The purpose of this Alien Invasive and Open Space Management Plan is to provide a framework for the management of alien and invasive plant species and the integrated management of the natural and semi-natural areas within the development area during the construction and operation of the Castle Wind Energy Facility. The broad objectives of the plan includes the following:

- » Ensure alien plants do not become dominant in parts or throughout the whole site in project areas through the control and management of alien and invasive species presence, dispersal and encroachment.
- » Managing and maintaining the ecosystem in a near-natural state and restoring and/or rehabilitating the ecosystems to such a state.
- » Develop and implement a monitoring and eradication programme for alien and invasive species.
- » Promote the natural re-establishment and planting of indigenous species in order to prevent erosion and alien plant invasion.

2. RELEVANT ASPECTS OF THE SITE

The disturbance associated with the construction of the facility will encourage the invasion of alien species into areas with very low current levels of invasion. Some alien invasion is inevitable and regular alien clearing activities would be required to limit the extent of this problem. Once the natural vegetation has returned to the disturbed areas, the site will be less vulnerable to alien plant invasion, however, the roadsides and turbine service areas are likely to remain foci of alien plant invasion. This impact is highly likely to occur during the operational phase of the development. The construction phase is considered too short for significant alien plant invasion to occur despite the fact that many alien species are likely to be imported at this point. Levels of invasion are low, several alien species were present including:

- » *Prosopis glandulosa*

Although the presence of these species within the development area are not directly of concern to the development of the wind energy facility, these are the species that are likely to become a problem within the disturbed areas of the site on account of seed input from adjacent areas.

3. LEGISLATIVE CONTEXT

Conservation of Agricultural Resources Act (Act No. 43 of 1983)

In terms of the amendments to the regulations under the Conservation of Agricultural Resources Act (Act No. 43 of 1983), all declared aliens must be effectively controlled. Landowners are legally responsible for the control of invasive alien plants on their properties. In terms of this Act, 198 alien species were listed as declared weeds and invaders and ascribed to one of the following categories:

- » Category 1: Prohibited and must be controlled.
- » Category 2 (commercially used plants): May be grown in demarcated areas provided that there is a permit and that steps are taken to prevent their spread.
- » Category 3 (ornamentally used plants): May no longer be planted. Existing plants may be retained as long as all reasonable steps are taken to prevent the spreading thereof, except within the flood line of watercourses and wetlands.

National Environmental Management: Biodiversity Act, 2004 (Act No.10 of 2004)

The National Environmental Management: Biodiversity Act (NEM:BA) regulates all invasive organisms in South Africa, including a wide range of fauna and flora. Regulations have been published in Government Notices R.506, R.507, R.508 and R.509 of 2013 under NEMBA. According to this Act and the regulations, any species designated under Section 70 cannot be propagated, grown, bought or sold without a permit. Below is an explanation of the three categories:

- » Category 1a: Invasive species requiring compulsory control. Any specimens of Category 1a listed species need, by law, to be eradicated from the environment. No permits will be issued.
- » Category 1b: Invasive species requiring compulsory control as part of an invasive species control programme. Remove and destroy. These plants are deemed to have such a high invasive potential that infestations can qualify to be placed under a government sponsored invasive species management programme. No permits will be issued.
- » Category 2: Invasive species regulated by area. A demarcation permit is required to import, possess, grow, breed, move, sell, buy or accept as a gift any plants listed as Category 2 plants. No permits will be issued for Cat 2 plants to exist in riparian zones.
- » Category 3: Invasive species regulated by activity. An individual plant permit is required to undertake any of the following restricted activities (import, possess, grow, breed, move, sell, buy or accept as a gift) involving a Category 3 species. No permits will be issued for Cat 3 plants to exist in riparian zones.

Plants listed under the categories above are detailed within the Alien and Invasive Species published in GNR1003 of 18 September 2020. The following guide is a useful starting point for the identification of alien species: Bromilow, C. 2010. Problem Plants and Alien Weeds of South Africa. Briza, Pretoria.

It is important to note that alien species that are regulated in terms of the Conservation of Agricultural Resources Act (Act 43 of 1983) (CARA) as weeds and invader plants are exempted from NEM:BA. This implies that the provisions of the CARA in respect of listed weed and invader plants supersede those of NEM:BA.

4. ALIEN PLANT MANAGEMENT PRINCIPLES

4.1. Prevention and early eradication

A prevention strategy should be considered and established, including regular surveys and monitoring for the presence of invasive alien plants, effective rehabilitation of disturbed areas and prevention of unnecessary disturbance of natural areas.

Monitoring plans should be developed which are designed to identify Invasive Alien Plant Species shortly after they establish in the project area. Keeping up to date on which weeds are an immediate threat to the site is important, but efforts should be planned to update this information on a regular basis. All alien plant re-growth (mostly forbs) must be monitored, and should it occur, these plants should be eradicated. The scale of the operation does however not warrant the use of a Landscape Architect and / or Landscape Contractor.

When new Invasive Alien Plant Species are recorded on site, an immediate response of identifying the area for future monitoring and either hand-pulling the weeds or an application of a suitable herbicide should be planned. It is, however, better to monitor regularly and act swiftly than to allow invasive alien plants to become established on site.

4.2. Containment and control

If any alien invasive plants are found to become established on site, action plans for their control should be developed, depending on the size of the infestations, budgets, manpower considerations and time. Separate plans and control actions should be developed for each location and/or each species. Appropriate registered chemicals and other possible control agents should be considered in the action plans for each site/species. The key is to ensure that no invasions get out of control. Effective containment and control will ensure that the least energy and resources are required to maintain this status over the long-term. This will also be an indicator that natural systems are impacted to the smallest degree possible.

4.3. General Clearing and Guiding Principles

Alien control programs are long-term management projects and should include a clearing plan which includes follow up actions for rehabilitation of the cleared area. The lighter infested areas should be cleared first to prevent the build-up of alien seed banks. Pre-existing dense mature stands ideally should be left for last, as they probably will not increase in density or pose a greater threat than they are currently. Collective management and planning with neighbours may be required in the case of large woody invaders as seeds of aliens are easily dispersed across boundaries by wind or watercourses. All clearing actions should be monitored and documented to keep records of which areas are due for follow-up clearing.

i. Clearing Methods

Different species require different clearing methods such as manual, chemical or biological methods or a combination of both. Care should however be taken that the clearing methods used do not encourage further invasion. As such, regardless of the methods used, disturbance to the soil should be kept to a minimum.

Fire shall not be used for alien control or vegetation management at the site. The best-practice clearing method for each species identified should be used. The preferred clearing methods for most alien species can be obtained from the Department of Water Affairs and Forestry (DWAF) Working for Water (WfW) group.

» **Mechanical control**

This entails damaging or removing the plant by physical action. Different techniques could be used, e.g. uprooting, felling, slashing, mowing, ringbarking or bark stripping. This control option is only really feasible in sparse infestations or on small scale, and for controlling species that do not coppice after cutting. Species that tend to coppice, need to have the cut stumps or coppice growth treated with herbicides following the mechanical treatment. Mechanical control is labour intensive and therefore expensive, and could cause severe soil disturbance and erosion.

» **Chemical Control**

Although it is usually preferable to use manual clearing methods where possible, such methods may create additional disturbance which stimulates alien invasion and may also be ineffective for many woody species which re-sprout. Where herbicides are to be used, the impact of the operation on the natural environment should be minimised by observing the following:

- * Area contamination must be minimised by careful, accurate application with a minimum amount of herbicide to achieve good control.
- * All care must be taken to prevent contamination of any water bodies. This includes due care in storage, application, cleaning equipment and disposal of containers, product and spray mixtures.
- * Equipment should be washed where there is no danger of contaminating water sources and washings carefully disposed of at a suitable site.
- * To avoid damage to indigenous or other desirable vegetation, products should be selected that will have the least effect on non-target vegetation.
- * Coarse droplet nozzles should be fitted to avoid drift onto neighbouring vegetation.
- * The appropriate health and safety procedures should also be followed regarding the storage, handling and disposal of herbicides.

For all herbicide applications, the following Regulations and guidelines should be followed:

- * Working for Water: Policy on the Use of Herbicides for the Control of Alien Vegetation.
- * Pesticide Management Policy for South Africa published in terms of the Fertilizers, Farm Feeds, Agricultural Remedies and Stock Remedies Act, 1947 (Act No. 36 of 1947) – GNR 1120 of 2010.
- * South African Bureau of Standards, Standard SANS 10206 (2010)

According to Government Notice No. 13424 dated 26 July 1992, it is an offence to “*acquire, dispose, sell or use an agricultural or stock remedy for a purpose or in a manner other than that specified on the label on a container thereof or on such a container*”.

Contractors using herbicides need to have a valid Pest Control Operators License (limited weeds controller) according to the Fertilizer, Farm Feeds, Agricultural Remedies and Stock Remedies Act (Act No. 36 of 1947). This is regulated by the Department of Agriculture, Forestry and Fisheries (DAFF).

» **Biological control**

Biological weed control consists in the use of natural enemies to reduce the vigour or reproductive potential of an invasive alien plant. Biological control agents include insects, mites, and micro-organisms such as fungi or bacteria. They usually attack specific parts of the plant, either the reproductive organs directly (flower buds, flowers or fruit) or the seeds after they have dropped. The stress caused by the biological control agent may kill a plant outright or it might impact on the plants reproductive capacity. In certain instances, the reproductive capacity is reduced to zero and the population is effectively sterilised. All of these outcomes will help to reduce the spread of the species.

To obtain appropriate biocontrol agents, provincial representatives of the Working for Water Programme or the Directorate: Land Use and Soil Management (LUSM), Department of Agriculture, Forestry and Fisheries (DAFF) can be contacted. In addition, any permits required for biocontrol agents will need to be obtained from the relevant provincial environmental authority representative.

4.4. General management practices

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

- » Establish an ongoing monitoring programme for the construction phase to detect and quantify any alien species that may become established and identify the problem species.
- » Alien vegetation regrowth on areas disturbed by construction must be immediately controlled once recorded - throughout the entire project site during construction and operation.
- » Care must be taken to avoid the introduction of alien invasive plant species to the project site. Particular attention must be paid to imported material such as building sand or dirty earth-moving equipment. Stockpiles should be checked regularly and any weeds emerging from material stockpiles should be removed.
- » Cleared areas that have become invaded by alien species can be sprayed with appropriate herbicides provided that these are such that they break down on contact with the soil. Residual herbicides should not be used. Mechanical/ manual method should however also be considered as an option.
- » The effectiveness of vegetation control varies seasonally and this is also likely to impact alien species. Control early in the wet season will allow species to re-grow and follow-up control is likely to be required. It is tempting to leave control until late in the wet season to avoid follow-up control. However, this may allow alien species to set seed before control and hence will not contribute towards reducing alien species abundance. Therefore, vegetation control should be aimed at the middle of the wet season, with a follow-up event towards the end of the wet season. There are no exact dates that can be specified here as each season is unique and management must therefore respond according to the state and progression of the vegetation.
- » Alien vegetation management is an iterative process and it may require repeated control efforts to significantly reduce the abundance of a species. This is often due to the presence of large and persistent seed banks. However, repeated control usually results in rapid decline once seed banks become depleted.
- » Some alien species are best individually pulled by hand and removed from the site.
- » Regular vegetation control to reduce plant biomass within the site should be conducted. This should be timed so as to coincide with the critical growth phases of the most important alien species on site. This will significantly reduce the cost of alien management as this should contribute towards the

control of the dominant alien species and additional targeted control will be required only for a limited number of species.

- » No alien species should be cultivated on-site. If vegetation is required for aesthetic purposes, then non-invasive, water-wise locally-occurring species should be used.
- » During operation, surveys for alien species should be conducted regularly. It is recommended that this be undertaken every 6 months for the first two years after construction and annually thereafter. All alien vegetation species identified should be cleared using appropriate means or as advised by a suitably qualified specialist.

4.5. Monitoring

In order to monitor the impact of clearing activities, follow-ups and rehabilitation efforts, monitoring must be undertaken. This section provides a description of a possible monitoring programme that will provide an assessment of the magnitude of alien invasion on site as well as an assessment of the success of the management programme.

In general, the following principles apply for monitoring:

- » Photographic records must be kept of areas to be cleared prior to work starting and at regular intervals during initial clearing activities. Similarly, photographic records should be kept of the area from immediately before and after follow-up clearing activities. Rehabilitation processes must also be recorded.
- » Simple records must be kept of daily operations, e.g. area/location cleared, labour units and, if ever used, the amount of herbicide used.
- » It is important that, if monitoring results in detection of invasive alien plants, that this leads to immediate action.

The following monitoring could be used as a baseline in the absence of a site specific monitoring plan (which would take preference) to ensure management of alien invasive plant species.

Construction Phase

Monitoring Action	Indicator	Timeframe
Document alien species present at the site	List of alien species	Preconstruction & monthly thereafter
Document alien plant distribution	Alien plant distribution map within priority areas	3 Monthly
Document & record alien control measures implemented	Record of clearing activities	3 Monthly
Review & evaluation of control success rate	Decline in documented alien abundance over time	Biannually

Operation Phase

Monitoring Action	Indicator	Timeframe
Document alien species distribution and abundance over time at the site	Alien plant distribution map	Biannually (first 2 years) / Annually
Document alien plant control measures implemented & success rate achieved	Records of control measures and their success rate.	Biannually (first 2 years) / Annually

Monitoring Action	Indicator	Timeframe
	A decline in alien distribution and cover over time at the site	
Document rehabilitation measures implemented and success achieved in problem areas	Decline in vulnerable bare areas over time	Biannually (first 2 years) / Annually

5. OPEN SPACE MANAGEMENT PRINCIPLES

The following elements are considered part of the Open Space Management Plan. The principles contained within the Alien Invasive Management Plan should also be considered to form part of the Open Space Management Plan.

Access Control:

- » Access to the facility should be strictly controlled.
- » All visitors and contractors should be required to sign-in.
- » Signage at the entrance should indicate that disturbance to fauna and flora is strictly prohibited.

Prohibited Activities:

The following activities should not be permitted by anyone except the landowner or his representatives:

- » No fires within the site.
- » No hunting, collecting or disturbance of fauna and flora, except where required for the safe operation of the facility and only by the Environmental Officer on duty and with the appropriate permits and landowner permission.
- » No driving off of demarcated roads.
- » No interfering with livestock.

Fire Risk Management:

Although fires are not a regular occurrence at the site, fires may occasionally occur. Ignition risk sources in the area include the following:

- » Lightning strikes
- » Personnel within the facility
- » Infrastructure such as transmission lines

The National Veld and Forest Fires Act places responsibility on the landowner to ensure that the appropriate equipment as well as trained personnel are available to combat fires. Therefore, the management of the facility should ensure that they have suitable equipment as well as trained personnel available to assist in the event of fire.

Firebreaks

Extensive firebreaks are not recommended as a fire-risk management strategy at the site. The site is very large compared to the extent of the infrastructure and the maintenance of firebreaks would impose a large management burden on the operation of the facility. In addition, the risk of fires is not distributed equally across the site and within many of the lowlands of the site, there is not sufficient biomass to carry fires and the risk of fires within these areas is very low. Rather targeted risk management should be implemented around vulnerable or sensitive elements of the facility such as substations or other high-risk components.

Within such areas, the extent over which management action needs to be applied is relatively limited and it is recommended that firebreaks are created by mowing and that burning to create firebreaks is not used as this in itself poses a risk of runaway fires. Where such firebreaks need to be built as per approved designs, such as around the substation, a strip of vegetation 5-10 m wide can be cleared manually and maintained relatively free of vegetation through manual clearing on an annual basis. However, if alien species colonise these areas, more regular clearing should be implemented.