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# PROPOSED CASTLE WIND ENERGY FACILITY, LOCATED NEAR DE AAR IN THE NORTHERN CAPE PROVINCE

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## CONSTRUCTION & OPERATION ENVIRONMENTAL MANAGEMENT PROGRAMME

DFFE REFERENCE: 14/12/16/3/3/2/278

REVISION 2

Submitted in order to comply with per EA conditions 15 and 16 of the Environmental  
Authorisation  
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## PROJECT DETAILS

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<b><u>Revision</u></b>		<u>2</u>

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## DEFINITIONS AND TERMINOLOGY

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**Alien species:** A species that is not indigenous to the area or out of its natural distribution range.

**Alternatives:** Alternatives are different means of meeting the general purpose and need of a proposed activity. Alternatives may include location or site alternatives, activity alternatives, process, or technology alternatives, temporal alternatives or the 'do nothing' alternative.

**Ambient sound level:** The reading on an integrating impulse sound level meter taken at a measuring point in the absence of any alleged disturbing noise at the end of a total period of at least 10 minutes after such meter was put into operation.

**Assessment:** The process of collecting, organising, analysing, interpreting and communicating information which is relevant.

**Biological diversity:** The variables among living organisms from all sources including, terrestrial, marine and other aquatic ecosystems and the ecological complexes they belong to.

**Commencement:** The start of any physical activity, including site preparation and any other activity on site furtherance of a listed activity or specified activity, but does not include any activity required for the purposes of an investigation or feasibility study as long as such investigation or feasibility study does not constitute a listed activity or specified activity.

**Commercial Operation date:** The date after which all testing and commissioning has been completed and is the initiation date to which the seller can start producing electricity for sale (i.e. when the project has been substantially completed).

**Commissioning:** Commissioning commences once construction is completed. Commissioning covers all activities including testing after all components of the power station are installed.

**Construction:** Construction means the building, erection or establishment of a facility, structure or infrastructure that is necessary for the undertaking of a listed or specified activity as per the EIA Regulations. Construction begins with any activity which requires Environmental Authorisation.

**Cumulative impacts:** Impacts that result from the incremental impact of the proposed activity on a common resource when added to the impacts of other past, present or reasonably foreseeable future activities (e.g. discharges of nutrients and heated water to a river that combine to cause algal bloom and subsequent loss of dissolved oxygen that is greater than the additive impacts of each pollutant). Cumulative impacts can occur from the collective impacts of individual minor actions over a period and can include both direct and indirect impacts.

**Cut-in speed:** The minimum wind speed at which the wind turbine will generate usable power.

**Cut-out speed:** The wind speed at which shut down occurs.

**Decommissioning:** To take out of active service permanently or dismantle partly or wholly, or closure of a facility to the extent that it cannot be readily re-commissioned. This usually occurs at the end of the life of a facility.

**Department/ the competent authority:** Refers to the Department of Forestry, Fisheries and the Environmental or any other relevant authority responsible for administering environmental laws.

**Development footprint:** In respect of land, means any evidence of it's physical transformation as a result of the undertaking of any activity.

**Direct impacts:** Impacts that are caused directly by the activity and generally occur at the same time and at the place of the activity (e.g. noise generated by blasting operations on the site of the activity). These impacts are usually associated with the construction, operation, or maintenance of an activity and are generally obvious and quantifiable.

**Disturbing noise:** A noise level that exceeds the ambient sound level measured continuously at the same measuring point by 7 dB or more. A disturbing noise would be a noise that increases the rating level with more than 7 dBA. Therefore, for this area the rating level is 35 dBA, and if the operation of the wind energy facility results in a noise level higher than 42 dBA, and that change can be attributed to the wind energy facility, that would be a disturbing noise.

**'Do nothing' alternative:** The 'do nothing' alternative is the option of not undertaking the proposed activity or any of its alternatives. The 'do nothing' alternative also provides the baseline against which the impacts of other alternatives should be compared.

**Ecosystem:** A dynamic system of plant, animal and micro-organism communities and their non-living environment interacting as a functional unit.

**Endangered species:** Taxa in danger of extinction and whose survival is unlikely if the causal factors continue operating. Included here are taxa whose numbers of individuals have been reduced to a critical level or whose habitats have been so drastically reduced that they are deemed to be in immediate danger of extinction.

**Endemic:** An "endemic" is a species that grows in a particular area (is endemic to that region) and has a restricted distribution. It is only found in a particular place. Whether something is endemic or not depends on the geographical boundaries of the area in question and the area can be defined at different scales.

**Environment:** the surroundings within which humans exist and that are made up of:

(i) The land, water and atmosphere of the earth;

- (ii) Micro-organisms, plant and animal life;
- (iii) Any part or combination of (i) and (ii) and the interrelationships among and between them; and
- (iv) The physical, chemical, aesthetic and cultural properties and conditions of the foregoing that influence human health and well-being.

**Environmental assessment practitioner:** An individual responsible for the planning, management and coordinating of the environmental impact assessment process or any other appropriate environmental instruments introduced by legislation.

**Environmental Impact:** An action or series of actions that have an effect on the environment.

**Environmental impact assessment:** Environmental Impact Assessment (EIA), as defined in the NEMA EIA Regulations and in relation to an application to which scoping must be applied, means the process of collecting, organising, analysing, interpreting and communicating information that is relevant to the consideration of that application.

**Environmental management:** Ensuring that environmental concerns are included in all stages of development, so that development is sustainable and does not exceed the carrying capacity of the environment.

**Environmental management inspector:** A person designated as an environmental management inspector in terms of Section 31B or 31C on the National Environmental Management Act 107 of 1998.

**Environmental management programme:** A programme that organises and co-ordinates mitigation, rehabilitation and monitoring measures in order to guide the implementation of a proposal and its on-going maintenance after implementation.

**Generator:** The generator is what converts the turning motion of a wind turbine's blades into electricity.

**Habitat:** The place in which a species or ecological community occurs naturally.

**Hazardous waste:** Any waste that contains organic or inorganic elements or compounds that may, owing to the inherent physical, chemical or toxicological characteristics of that waste, have a detrimental impact on health and the environment (Van der Linde and Feris, 2010;pg 185).

**Indigenous:** All biological organisms that occurred naturally within the study area prior to 1800

**Indirect impacts:** Indirect or induced changes that may occur because of the activity (e.g. the reduction of water in a stream that supply water to a reservoir that supply water to the activity). These types of impacts include all the potential impacts that do not manifest immediately when the activity is undertaken or which occur at a different place because of the activity.

**Interested and affected party:** Individuals or groups concerned with or affected by an activity and its consequences. These include the authorities, local communities, investors, work force, consumers, environmental interest groups and the general public.

**Method statement:** A method statement is a written submission to the ECO and the Proponent's Representative by an appointed Contractor(s) in collaboration with his/her EO.

**Nacelle:** The nacelle contains the generator, control equipment, gearbox, and anemometer for monitoring the wind speed and direction.

**Natural properties of an ecosystem (sensu Convention on Wetlands):** Defined in Handbook 1 as the "...physical, biological or chemical components, such as soil, water, plants, animals and nutrients, and the interactions between them". (Ramsar Convention Secretariat. 2004. Ramsar handbooks for the wise use of wetlands. 2nd Edition. Handbook 1. Ramsar Convention Secretariat, Gland, Switzerland.) (see <http://www.ramsar.org/>).

**Perennial and non-perennial:** Perennial systems contain flow or standing water for all or a large proportion of any given year, while non-perennial systems are episodic or ephemeral and thus contains flows for short periods, such as a few hours or days in the case of drainage lines.

**Pollution:** A change in the environment caused by substances (radio-active or other waves, noise, odours, dust or heat emitted from any activity, including the storage or treatment or waste or substances.

**Pre-construction:** The period prior to the commencement of construction, which may include activities which do not require Environmental Authorisation (e.g. geotechnical surveys).

**Rare species:** Taxa with small world populations that are not at present Endangered or Vulnerable, but are at risk as some unexpected threat could easily cause a critical decline. These taxa are usually localised within restricted geographical areas or habitats or are thinly scattered over a more extensive range. This category was termed Critically Rare by Hall and Veldhuis (1985) to distinguish it from the more generally used word "rare."

**Red data species:** Species listed in terms of the International Union for Conservation of Nature and Natural Resources (IUCN) Red List of Threatened Species, and/or in terms of the South African Red Data list. In terms of the South African Red Data list, species are classified as being extinct, endangered, vulnerable, rare, indeterminate, insufficiently known or not threatened (see other definitions within this glossary).

**Rotor:** The portion of the wind turbine that collects energy from the wind is called the rotor. The rotor converts the energy in the wind into rotational energy to turn the generator. The rotor has three blades that rotate at a constant speed of about 15 to 28 revolutions per minute (rpm).

**Significant impact:** An impact that by its magnitude, duration, intensity, or probability of occurrence may have a notable effect on one or more aspects of the environment.

**Tower:** The tower, which supports the nacelle to which the rotor is attached, is constructed from tubular steel or concrete. It is approximately 90 m to 150m tall. The nacelle and the rotor are attached to the top of the tower. The tower on which a wind turbine is mounted is not just a support structure. It also raises the wind turbine so that its blades safely clear the ground and so it can reach the stronger winds at higher elevations. Larger wind turbines are usually mounted on towers ranging from 40 to 150 m tall. The tower must be strong enough to support the nacelle and blades, and to sustain vibration, wind loading and the overall weather elements for the lifetime of the wind turbine.

**Waste:** Is defined as follows:

- a) any substance, material or object, that is unwanted, rejected, abandoned, discarded or
- b) disposed of, or that is intended or required to be discarded or disposed of, by the holder of that substance, material or object, whether or not such substance, material or object can be re-used, recycled or recovered and includes all wastes as defined in Schedule 3 to this Act; or
- c) any other substance, material or object that is not included in Schedule 3 that may be defined as a waste by the Minister by notice in the Gazette, but any waste or portion of waste, referred to in paragraphs (a) and (b), ceases to be a waste.

**Watercourse:** as per the National Water Act means -

(a) a river or spring;

(b) a natural channel in which water flows regularly or intermittently;

(c) a wetland, lake or dam into which, or from which, water flows; and

(d) any collection of water which the Minister may, by notice in the Gazette, declare to be a watercourse, and a reference to a watercourse includes, where relevant, its bed and banks.

**Wetland:** Wetlands are defined in the National Water Act as 'land which is transitional between terrestrial and aquatic systems where the water table is usually at or near the surface, or the land is periodically covered with shallow water, and which land in normal circumstances supports or would support vegetation typically adapted to life in saturated soil.

- » **Intermittent or seasonal wetlands:** are vleis or larger drainage lines where water tends to accumulate during the rainy season, and may persist for a week or longer, usually several months. In this case there is enough seasonal moisture accumulation to ensure that surface soils remain waterlogged for a longer period, hence also supporting specially adapted flora that will grow in (seasonally) saturated soils.
- » **Perennial<sup>1</sup> wetlands:** are all dams, rivers and other water bodies that carry water permanently, and will only have severely reduced flows or water during periods of prolonged severe droughts.

**Wind power:** A measure of the energy available in the wind.

**Wind speed:** The rate at which air flows past a point above the earth's surface.

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<sup>1</sup> Perennial: from Latin per, "through", annus, "year", lasting or active through the year or through many years, indefinitely.

## **ABBREVIATIONS AND ACRONYMS**

<u>DFFE</u>	<u>National Department of Forestry, Fisheries and the Environment</u>
DWS	Department of Water and Sanitation
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme
EO	Environmental Office
GG	Government Gazette
GN	Government Notice
Ha	Hectare
I&AP	Interested and Affected Party
km <sup>2</sup>	Square kilometres
kV	Kilovolt
m <sup>2</sup>	Square meters
m/s	Meters per second
MW	Mega Watt
NEMA	National Environmental Management Act (Act No 107 of 1998)
NHRA	National Heritage Resources Act (Act No 25 of 1999)
NIRP	National Integrated Resource Planning
NWA	National Water Act (Act No 36 of 1998)
PM	Project Manager
SHE	Safety, Health and Environment
SAHRA	South African Heritage Resources Agency
SANRAL	South African National Roads Agency Limited



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## CHAPTER 1: PURPOSE AND OBJECTIVES OF THE EMPR

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An Environmental Management Programme (EMPr) is defined as “an environmental management tool used to ensure that undue or reasonably avoidable adverse impacts of the construction, operation and decommissioning of a project are prevented or mitigated, and that the positive benefits of the projects are enhanced”<sup>2</sup>. The objective of this EMPr is to provide consistent information and guidance for implementing the management and monitoring measures established in the permitting process and help achieve environmental policy goals. The purpose of an EMPr is to help ensure continuous improvement of environmental performance, reducing negative impacts and enhancing positive effects during the construction and operation of the facility. An effective EMPr is concerned with both the immediate outcome as well as the long-term impacts of the project.

The EMPr provides specific environmental guidance for the construction and operation phases of a project, and is intended to manage and mitigate construction and operation activities so that unnecessary or preventable environmental impacts do not result. These impacts range from those incurred during start up (site clearing and site establishment) through those incurred during the construction activities themselves (erosion, noise, dust) to those incurred during site rehabilitation (soil stabilisation, re-vegetation) and operation. The EMPr also defines monitoring requirements in order to ensure that the specified objectives are met.

The EMPr has been developed as a set of environmental specifications (i.e. principles of environmental management for the proposed Castle Wind Energy Facility), which are appropriately contextualised to provide clear guidance in terms of the on-site implementation of these specifications (i.e. on-site contextualisation is provided through the inclusion of various monitoring and implementation tools for assisted use of the EMPr by the project implementer as well as compliance monitors).

The EMPr has the following objectives:

- » To outline mitigation measures and environmental specifications which are required to be implemented for the planning, construction, rehabilitation and operation phases of the project in order to minimise the extent of environmental impacts, and to manage environmental impacts associated with the wind energy facility.
- » To ensure that the construction and operation phases do not result in undue or reasonably avoidable adverse environmental impacts, and ensure that any potential environmental benefits are enhanced.
- » To identify entities who will be responsible for the implementation of the measures and outline functions and responsibilities.
- » To propose mechanisms and frequency for monitoring compliance, and preventing long-term or permanent environmental degradation.

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<sup>2</sup> Provincial Government Western Cape, Department of Environmental Affairs and Development Planning: *Guideline for Environmental Management Plans*. 2005

- » To facilitate appropriate and proactive responses to unforeseen events or changes in project implementation that was not considered in the EIA process.

The mitigation measures identified within the Environmental Impact Assessment process are systematically addressed in the EMPr, ensuring the minimisation of adverse environmental impacts to an acceptable level.

Castle Wind Farm (Pty) Ltd must ensure that the implementation of the project complies with the requirements of any and all environmental authorisations (**Appendix M**) and permits (once issued), as well as with obligations emanating from all relevant environmental legislation. This obligation is partly met through the development of the EMPr, and the implementation of the EMPr through its integration into the contract documentation for activities associated with both construction and operation. Since this EMPr is part of the EIA process undertaken for the proposed Castle Energy Wind Facility, it is important that this document be read in conjunction with the Scoping Report (November 2013) and EIA Report (November 2014), as well as any relevant specialist studies conducted in accordance with the EA conditions 15 and 16. This will contextualise the EMPr and enable a thorough understanding of its role and purpose in the integrated environmental management process. This EMPr for pre-construction, construction, operational and decommissioning activities has been compiled in accordance with Appendix 4 of the EIA Regulations (2014) as amended and in terms of specific requirements listed in any authorisations issued for the proposed project.

To achieve effective environmental management, it is important that Contractors are aware of their responsibilities in terms of the relevant environmental legislation and the contents of this EMPr. The Contractor is responsible for informing employees and sub-contractors of their environmental obligations in terms of the environmental specifications, and for ensuring that employees are adequately experienced and properly trained in order to execute the works in a manner that will minimise environmental impacts. The Contractors obligations in this regard include the following:

- » Ensuring that employees have a basic understanding of the key environmental features of the construction site and the surrounding environment.
- » Ensuring that a copy of the EMPr is readily available on-site, and that all site staff are aware of the location and have access to the document. Employees must be familiar with the requirements of the EMPr and the environmental specifications as they apply to the construction of the facility.
- » Ensuring that, prior to commencing any site works, all employees and sub-contractors have attended an appropriate Environmental Awareness Training course. The course must provide the site staff with an appreciation of the project's environmental requirements, the EMPr specifications, and how they are to be implemented.
- » Basic training in the identification of archaeological sites/objects, and protected or Red List flora and fauna that may be encountered on the site.
- » Awareness of any other environmental matters, which are deemed to be necessary by the Environmental Control Officer (ECO).

An Environmental Authorisation (EA) for the Castle Wind Energy Facility and associated infrastructure, in the Northern Cape Province (DEA ref: 14/12/16/3/3/2/278) was obtained by Castle Wind Farm (Pty) Ltd on 8 May 2015. The project comprises a wind farm of up to 118MW.

There have been advancements to wind turbine technology since the issuing of the EA, and the turbine model authorised in the EA is therefore no longer considered to be the most suitable in terms of production and economic factors.

In this regard, Castle Wind Farm (Pty) Ltd is considering an alternative turbine model for the project and is proposing the following amendments to the project description considered in the EIA process, as follows:

1. An increase in rotor diameter for each turbine of **up to 200m**;
2. An increase in hub height of **up to 150m**; and
3. An increase in the individual generating capacity of each turbine **of up to 7.9 MW**.

The 2019 amendment application entailed an updated turbine model for the project and amendments to various conditions. This amendment is included in **Appendix M**. The EMPr is a dynamic document, which must be updated when required. It is considered critical that this EMPr be updated to include site-specific information and specifications as required throughout the life-cycle of the facility. This will ensure that the project activities are planned and implemented taking sensitive environmental features into account.

### 1.1. EMPr and Layout update as required in section 12 and 16.

This EMPr and Layout update is being undertaken in accordance with the requirements of Condition 12 and 16 of the EA dated, 08 May 2015.

**Table 1.1:** Indicates how the conditions of the EA have been addressed in this EMPr/Layout update:

EA Condition Reference	Section of EMPr where Condition has been addressed
12. A copy of the final site layout plan must be submitted to the Department for written approval prior to commencement of the activity. All available biodiversity information must be used in the finalisation of the layout plan. The layout map must indicate the following:	The Final Layout and EMPr will be submitted to the Department on the 11 March 2022 for consideration.
12.1 Turbine positions;	It can be confirmed the turbine positions and associated infrastructure have been included in the final layout. Please refer to <b>Appendix K</b> of the EMPr.
12.2 Foundation footprint;	
12.3 Construction period lay down footprint;	
12.4 Internal roads indicated width (construction period width and operation period width) and with numbered section between the other site elements which they serve (to make commenting on sections possible)	It is very difficult to see the internal width of the access roads on the layout map, however they are indicated in the EMPr. Note that the EMPr stipulates that the road width will be approximately 8m wide.
12.5 Internal roads indicated width	It is very difficult to see the internal width of the access roads on the layout map, however they are indicated in the EMPr. Note that the EMPr stipulates that the road width will be approximately 8m wide, which will be

EA Condition Reference	Section of EMPr where Condition has been addressed
	complied with.
12.6 Wetlands, drainage lines, rivers, stream and water crossing of roads and cables	The location of all wetlands, drainage lines, rivers, stream and water crossing were taken into consideration when finalising the location of the roads and cables. The walkthrough assessment confirmed the suitability of the location of the roads and cables. Please refer to the combined Layout and sensitivity map in <b>Appendix K</b> of the EMPr which shows the location of these freshwater features..
12.7 The location of heritage sites;	All sensitive features (Important Bird Areas, Critical Biodiversity Areas, Ecological Support Areas, heritage sites, wetlands, pans and drainage channels) identified during the EIA and the Specialist walkthrough assessment were identified and the micro-sitting of the infrastructure in the final layout took the environmental sensitivities that will be affected by the facility and associated infrastructure into consideration. Please refer to the combined Layout and sensitivity map in <b>Appendix K</b> of the EMPr.
12.8 Sub-station(s) and/or transformer(s) sites including their entire footprint;	The substation and the associated infrastructures location has been included in the final layout (location is highlighted in maroon on the final layout).
12.10 Connection routes (including pylon positions) to the distribution/transmission network;	All grid connection routes connecting to the facility substation have been included in the Final layout) on the layout map. The section of the overhead 132 KV line from the facility substation was included for context. It should however be noted that the main 132kV grid connection was authorised separately.
12.11 Cut and fill areas at turbine sites along roads and at sub-station/transformer sites indicating the expected volume of each cut and fill	Refer to <b>Appendix K</b> .
12.12 Borrow pits	
12.13 Spoil heaps (temporary for topsoil and subsoil and permanently for excess material);	All temporary infrastructures (site camp, batching plants and laydown area). Soil/ material storage will occur within the laydown / site camp areas.
12.14 All existing infrastructure on the site, especially roads;	All existing infrastructure on the site, such as roads have been included in the final layout map.
12.15 Buildings, including accommodation;	The location of the Operations & Maintenance building has been included in the final layout. No other buildings are proposed, and no accommodation facilities are offered on site.
12.16 All "no-go" areas	The facility layout was optimised to avoid all identified no-go areas. The final walkthroughs that were conducted also confirm that no infrastructures were placed in no-go areas. All no-go areas are shown in the combined Layout and sensitivity map in <b>Appendix K</b> of the EMPr
12.17 A map combining the final layout plan superimposed (overlain) on the environmental sensitivity	A map combining the final layout plan superimposed (overlain) on the environmental sensitivity map has been

EA Condition Reference	Section of EMPr where Condition has been addressed
map. This map must reflect the proposed location of turbines as stated in the EIR dated February 2015 and this authorisation.	included in Chapter 2.
<b>The EMPr amendments must include the following:</b>	
16. The EMPr amendments must include the following	This is the updated EMPr Rev 2 which has been updated to take into account all measures arising from the final specialist walkthrough and micro-siting exercise, and the resultant final layout. This EMPr has been submitted for comment to the registered interested and affected parties and the public for comment from 12 July 2021 to 12 August 2021. All comments received have been considered and the EMPr amended as such.
16.1 All recommendations and mitigation measures recorded in the EIAR dated February 2015.	The recommendations and mitigation measure recorded in the EIAR have been incorporated into the EMPr. Refer to Chapters 4, 5 and 6 of the EMPr. Where amendments and/or additions have been made, these have been underlined for an ease of reference.
16.2. The requirements and conditions of this authorisation.	The conditions of the EA dated 08 May 2022 have been incorporated into the EMPr. Refer to Chapters 4, 5 and 6 of the EMPr. Where amendments and/or additions have been made, these have been underlined for an ease of reference.
16.3 A plant rescue and protection plan which allows for the maximum transplant of conservation important species from areas to be transformed. This plan must be compiled by a vegetation specialist familiar with the site in consultation with the ECO and be implemented prior to the commencement of the construction phase.	The Plant and Rescue Protection Plan has been appended to the EMPr as <b>Appendix C</b> of the EMPr.
16.4 An Open space management plan to be implemented during the construction and operation of the facility.	An Alien Invasive Management Plan (inclusive of an Open Space Management Plan) has been included as <b>Appendix B</b> of the EMPr..
16.5. A re-vegetation and habitat rehabilitation plan to be implemented 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.	A Re-Vegetation and Rehabilitation Plan has been included in the EMPr as Appendix D.
16.6. An alien invasive management plan to be implemented during the construction and operation of the facility. The plan must include mitigation measures to reduce the invasion of alien species and ensure that the continuous monitoring and removal of alien species is undertaken.	An Alien Invasive Management Plan (inclusive of an Open Space Management Plan) has been included as <b>Appendix B</b> of the EMPr. The plan includes mitigation measures to be implemented to reduce the invasion of alien plant species within the project footprint and the surrounding area.
16.7. A stormwater management plan to be implemented during the construction and operation of the facility. The plan must ensure compliance with applicable regulations and prevent off-site migration of contaminated stormwater or increased soil erosion. The plan must include the construction of appropriate design measures	A Storm Water Management Plan has been included in the EMPr as <b>Appendix F</b> .



EA Condition Reference	Section of EMPr where Condition has been addressed
that allow surface and subsurface movement of water along drainage lines so as not to impede natural surface and subsurface flows. Drainage measures must promote the dissipation of stormwater run-off.	
16.8 An effective monitoring system to detect any leakage or spillage of all hazardous substances during their transportation, handling, use and storage. This must include precautionary measures to limit to the possibility of oil and other toxic liquids from entering the soil or storm water systems.	An Emergency Preparedness and Responses Plan has been included in the EMPr as <b>Appendix G</b> .
16.9 An erosion management plan for monitoring and rehabilitation erosion events associated with the facility. Appropriate erosion mitigation must form part of this plan to prevent and reduce the risk of any potential erosion	An Erosion Management Plan has been included in the EMPr as <b>Appendix H</b> .
16.10 A Transportation plan for the transportation of turbines components, main assembly cranes and other large pieces of equipment.	A Transportation and Traffic Management Plan has been included in the EMPr as <b>Appendix E</b> .
16.11 A traffic management plan for the site access roads to ensure that no hazards would result from the increase truck traffic flow would not be adversely impacted. This plan must include measures 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 as not to disturb existing retail and commercial operations.	
16.12 An Avifauna and Bat monitoring programme to document the effect of the operation of the energy facility on avifauna and bats. This must be compiled by a qualified specialist.	A post construction Avifaunal and Bat monitoring plan has been included as <b>Appendix I and J</b> .
16.13. An environmental sensitivity map indicating environmental sensitive areas and features identified during the EIA process.	A sensitivity map has been included in <b>Appendix K</b> .
16.14. 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.	The Stormwater Management Plan, including measures to protect hydrological features within the development area of the facility and the surrounding area has been included in <b>Appendix F</b> .

## CHAPTER 2: PROJECT DETAILS

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### 2.1. Overview of the Proposed Project

**Castle Wind Farm (Pty) Ltd** is proposing the establishment of a commercial wind energy facility and associated infrastructure on an identified site located near De Aar in the Northern Cape Province of South Africa. The proposed site is located within the Emthanjeni Local Municipality and Renosterberg Local Municipality, ~28 km north-east of De Aar and ~22 km south-west of Philipstown. This proposed project will be referred to as the **Castle Wind Energy Facility**.

The Castle Wind Energy Facility is proposed to be located on the following farm portions:

- » Portion 12 of Farm 165 (Vendussie Kuil);
- » Portion 13 of Farm 165 (Vendussie Kuil); and
- » The Remaining Extent of Portion 0 of Farm 8 (Knapdaar).

The project will include the following infrastructure<sup>3</sup>:

- » **Up to 24 Wind turbines** with a generating capacity of up to **7,9MW** each, with a **hub height between 90m to 150m** and a **rotor diameter between 110 to 200m**.
- » Turbine foundation/footprint.
- » **Cabling** between turbines to be laid underground (1m deep) along the road verge where practical to connect to an on-site substation.
- » Laydown area (footprint (20m x20m)).
- » **On-site substation** (132kV) which will be an approximate compound size of 100 m x 100 m).
- » **Internal access roads** (approximately 7m wide) linking the wind turbines and other infrastructure on the site. Existing farm roads will be used as far as possible. Due to the dispersed distribution pattern of wind turbines however, this will necessitate the construction of new access road roads in some areas.
- » Workshop area / office for control, maintenance and storage.

### 2.2. Conclusions and Recommendations of the EIA

This EMPr has been developed based on the findings of the Environmental Impact Assessment (EIA) (Savannah Environmental, 2014), and must be implemented to protect sensitive on-site and off-site features through controlling construction and operation activities that could have a detrimental effect on the environment, and through avoiding or minimising potential impacts.

The construction of the Castle Wind Farm will lead to permanent disturbance of an area of approximately 357 415m<sup>2</sup> in extent (i.e. 1.09% of the site). Permanently affected areas include the turbine footprints and associated infrastructure, as well as the internal underground internal connection cable routes and the internal access roads. From the specialist investigations undertaken for the proposed wind energy facility

development site, it was concluded that the majority of impacts identified through the EIA are of moderate to low significance with the implementation of appropriate mitigation. Limited areas of potential high sensitivity were identified (refer to the sensitivity map - Figure 1.2). These potentially sensitive areas include:

- » **Ecology:** The major sensitive features of the site are the larger drainage lines which are fairly well-developed, with significant amounts of tall woody biomass which contrasts with the surrounding landscape. The steeper, south-facing slopes are also considered ecologically sensitive on account of their woody biomass and more mesic environment. The less steep rocky areas are considered moderately sensitive on account of the presence of a variety of species of conservation concern. The remaining flats and gentle slopes are of lower sensitivity and typically consist of low shrubland or grassy shrubland representative of the Northern Upper Karoo vegetation type (which is a least threatened vegetation type). The majority of the turbines are located within these lower sensitivity areas. There are 4 turbines located within the moderately sensitive rocky areas, and no turbines are located on very steep slopes or within drainage lines (i.e. within highly sensitive areas).
- » **Freshwater ecosystems:** The Brak River and its larger tributaries within the study area are considered to be of a moderate to low ecological importance and Sensitivity. The ecological importance and sensitivity of the ephemeral tributaries are considered to be negligible. The ecological importance and sensitivity of the pans is very similar to that of the ephemeral streams, that is, marginal or negligible while the valley bottom wetlands are directly related to the Brak River and its larger tributaries, that is, moderate to low. There are no turbines located within a 100m of any delineated drainage line/streams or wetlands/pans, with the exception of turbine 5 which is approximately 50m away from a small drainage line. It is recommended that the turbine be shifted further southwards. Turbines 27 and 28 were previously located approximately 70m away from small drainage lines. However, the turbines have been relocated further away from these drainage lines as recommended by the specialist.
- » **Bat sensitive areas:** Potential roosting sites are present along several drainage lines and rocky elevations found throughout the proposed study site. These areas often have favourable weather conditions which cause increases in insect abundance and thus possible increases in bat activity. No turbines are located within any of the bat high sensitivity areas and their respective buffers, which are considered to be critical for resident bat populations, capable of elevated levels of bat activity and support greater bat diversity than the rest of the site. These areas are 'no-go' areas and turbines should not be located in these areas.
- » **Bird Habitat and Sensitive Areas:**

The species recorded flying most frequently on site were the Northern Black Korhaan, and Southern Pale Chanting Goshawk. The Lesser Kestrel and Amur Falcon were recorded infrequently on site, which may be as a result of low food occurrence during the monitoring programme (and these flocking species may occur in high numbers on site at some point during the lifespan of this project when food is more abundant). Due to the overall low flight activity recorded on site, the collision risk index that was developed highlighted very little in the way of spatial patterns in flight activity. No turbine re-positioning is recommended as a result of the collision risk index. Most flight activity recorded was in the flatter lower lying areas to the east, which are not targeted for turbine placement. Based on a formal risk assessment, two species emerge as being of 'medium' risk of impact by the proposed wind farm, the Northern Black Korhaan and the Southern Pale Chanting Goshawk. The significance of impacts on avifauna as a result of habitat destruction, disturbance of birds, and displacement of birds

is rated as medium significance. Collision of birds with turbines is rated as low significance. Site sensitivity mapping has identified buffers around dams, within which no turbines should ideally be built. The Avifaunal Assessment Report identified three turbines: T3; T4; and T13 which were slightly located within the bird sensitive buffer areas. As a migratory strategy the turbines have subsequently been relocated outside the sensitivity buffer areas previously identified.

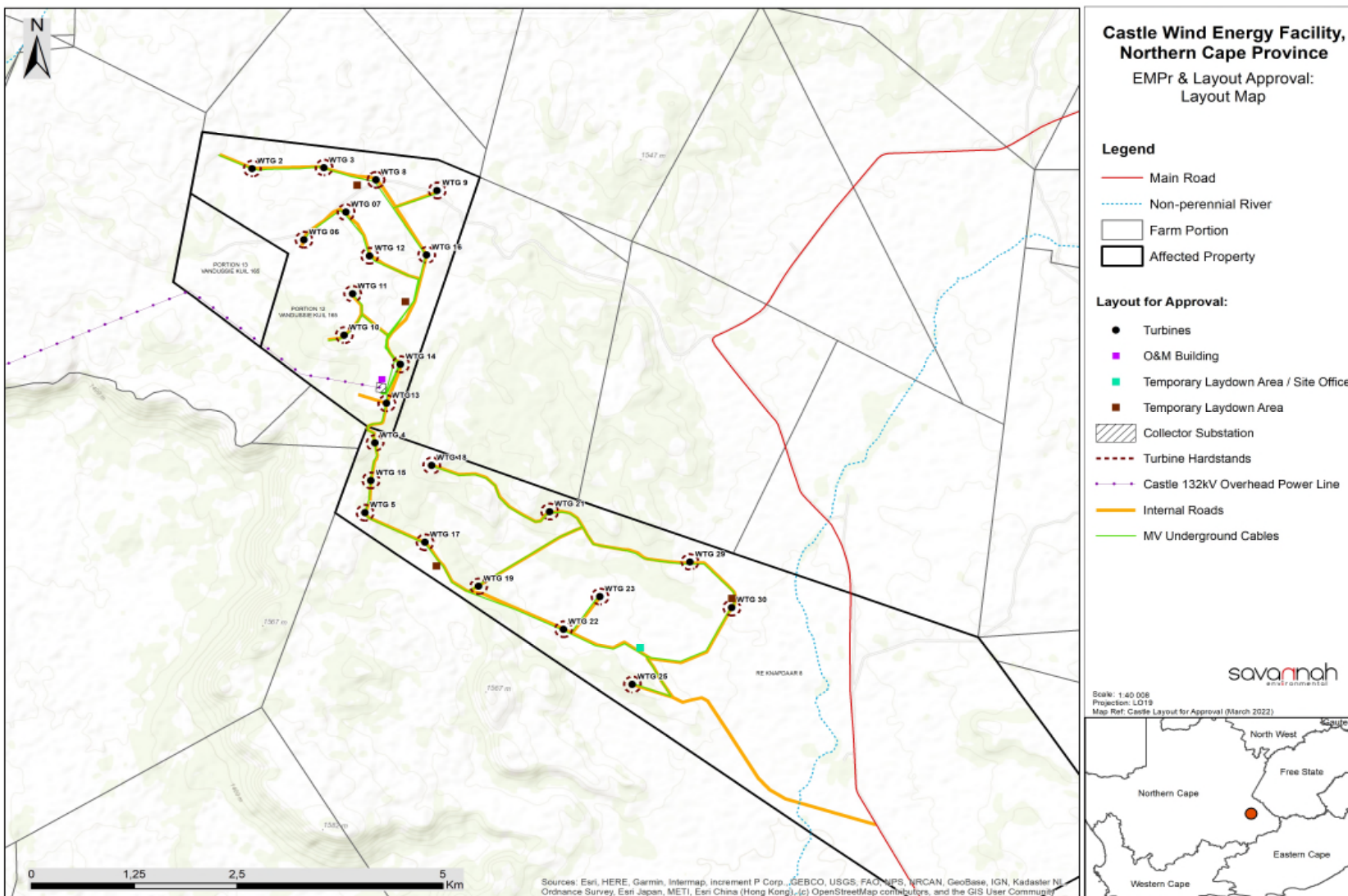
- » **Heritage artefacts:** Nine sites were recorded consisting of six Stone Age sites (Site 1, 3, 4, 6, 7, 9) a stone kraal (Site 2 that is a no-go area in development with a 100m buffer from the kraal wall) and 2 historical sites consisting of porcelain, glass and metal artefacts (Site 5) as well as historical/recent exploration or quarrying (Site 8). A further total of 3 find spots were recorded. Assemblages at the locations are mixed, mainly consisting of Middle Stone Age (MSA) and Late Stone Age (LSA) artefacts with some Early Stone Age (ESA) artefacts recorded. The latter are mostly heavily weathered, testifying to their prolonged exposure. No graves were observed in the study area. Artefacts consist mostly of blades, triangular flakes (some with dorsal flaking) and cores (identified as site 9) and site also consists of a large boulder with the engravings of two elephants on it (site 6) were found located in close proximity to turbine 2, however the area can be demarcated to avoid impacts.
- » **Noise sensitive receptors (NSRs):** Noise sensitive receptors do occur in and around the site. The significance of the noise impact is considered to be of a low significance for all Noise Sensitive Developments.
- » **Visual receptors:** The wind turbines would likely be exposed to a number of farm residences and sections of secondary roads traversing near or over the development site. Affected farmsteads, excluding the ones located within the development site, may include: Kranskop, Klipfontein, Vendusiekraal, Disselskuil and Slingershoek. It is envisaged that the structures (where visible from shorter distances) may constitute a high visual prominence, potentially resulting in a high visual impact. It must however be noted that a large section of the potential viewshed area of the Castle Wind Energy Facility turbines, especially within a 10km radius of the facility, fall within farms earmarked for construction of the Longyuan Mulilo De Aar 2 North Wind Energy Facility and Longyuan Mulilo De Aar 2 South Wind Energy Facility in 2015.

Impacts on the social environment are expected during both the construction phase and the operational phase of the wind farm. Impacts are expected at both a local and regional scale. Impacts on the social environment as a result of the construction of the wind farm can be mitigated to impacts of low significance or can be enhanced to be of positive significance to the region.

No construction crew camp will be established on the site, and construction workers will be housed in the towns of De Aar, Philipstown and Hanover, or other available/existing accommodation. Construction activities on the site will be restricted to daylight hours. The construction phase is anticipated to extend over approximately 18 months. Negative impacts on the social environment during construction relate mainly to impacts due to presence of construction workers and visual impact imposed by the facility on the local environment. With the implementation of the recommended mitigation measures, negative impacts will be reduced to be of medium to low significance, and are therefore considered acceptable.

There will be a positive impact due to employment creation, which is a much needed relief by the Emthanjeni Local Municipality and Renosterberg Local Municipality (which have high unemployment levels). The positive impact due to employment creation will be lower than during operation as there will

be a limited number of staff required compared to the construction phase. The potential negative social impacts of the proposed development are offset by the potential positive impacts. With the implementation of the recommended enhancement measures, positive impacts will be of medium to high significance, and are therefore considered acceptable.



**Figure 2.1:** Final Castle Wind Energy Facility Layout Map (the layout was optimised based on the findings of the walkthrough Report) (refer to **Appendix K** for an A3 maps).

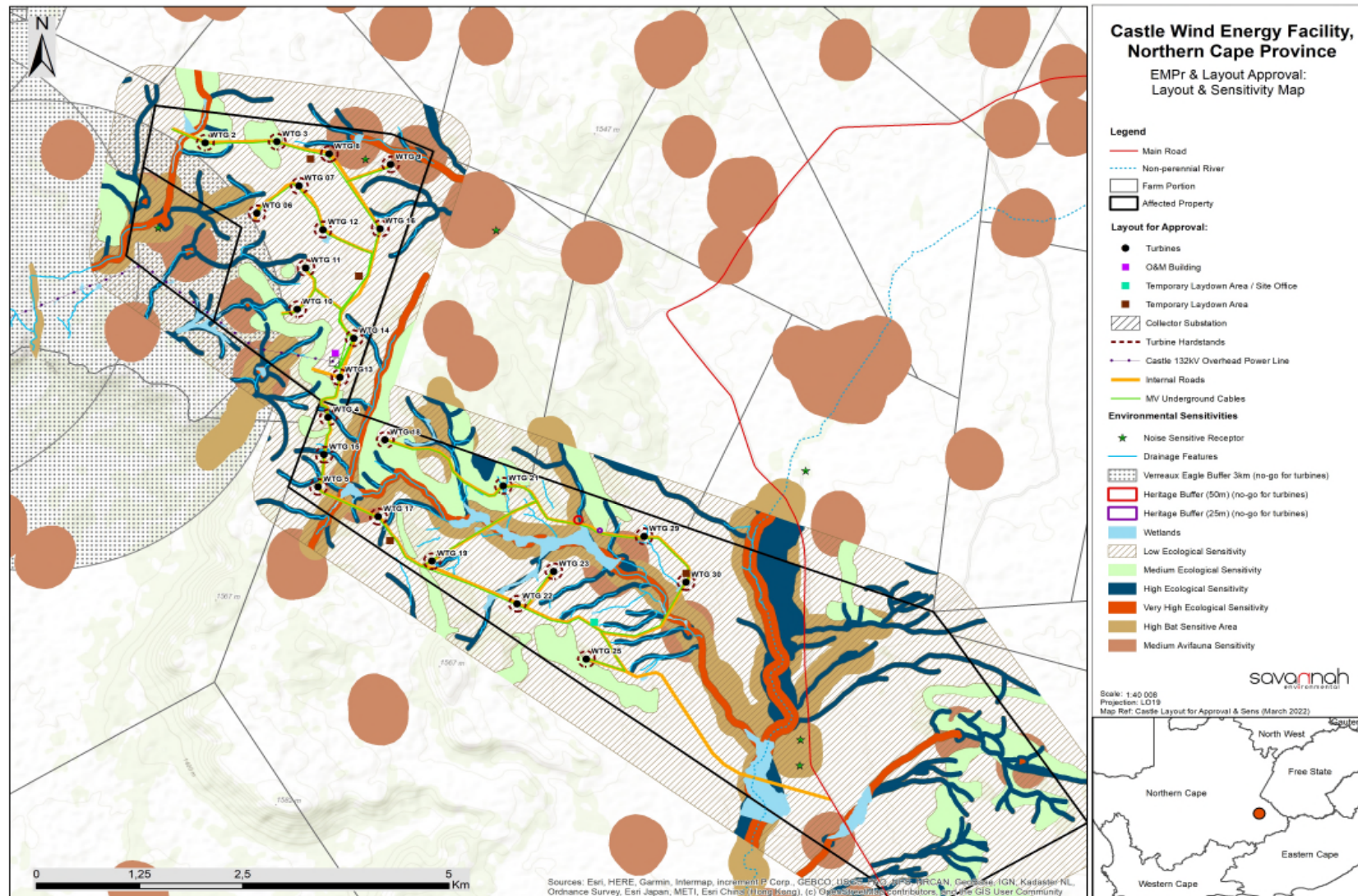


Figure 2.2: Environmental sensitivity map

## 2.4. Activities and Components associated with the Facility

The main activities/components associated with the Castle Wind Energy Facility are detailed in Table 2.1.

**Table 2.1:** Activities Associated with Planning, Construction, Operation and Decommissioning of the Facility

Main Activity/Project Component	Components of Activity	Details
<b>Planning</b>		
Conduct technical surveys	<ul style="list-style-type: none"> <li>» Geotechnical survey by geotechnical engineer;</li> <li>» Site survey and confirmation of the infrastructure micro-siting footprint;</li> <li>» Survey of internal access routes; and</li> <li>» Survey of on-site substation.</li> <li>» <u>Environmental walk-through surveys (completed)</u></li> </ul>	<ul style="list-style-type: none"> <li>» All surveys are to be undertaken prior to initiating construction.</li> </ul>
<b>Construction</b>		
Establishment of access roads	<ul style="list-style-type: none"> <li>» Upgrade access/haul roads to the site, as required (this only refers to the main access roads leading directly to site itself). Establish internal access roads: 7m wide permanent roadway within the site between the turbines for use during construction and operation phase.</li> <li>» Temporary track for use during construction phase only.</li> </ul>	<ul style="list-style-type: none"> <li>» Access roads will be constructed/upgraded in advance of any components being delivered to site, and will remain in place after completion for future access and possibly access for replacement of parts if necessary.</li> <li>» Existing access roads to the site will be utilised, and upgraded where required. Special haul roads may need to be constructed to and within the site to accommodate abnormally loaded vehicle access and circulation.</li> <li>» <u>The internal service road alignment is informed by the final micro-siting/positioning of the wind turbines (as well as by surveys undertaken by ecological (including aquatic), heritage (including palaeontology), bat and avifaunal specialists).</u></li> </ul>
Undertake site preparation	<ul style="list-style-type: none"> <li>» Site establishment of offices / workshop</li> </ul>	<ul style="list-style-type: none"> <li>» These activities will require the stripping of topsoil, which will need to</li> </ul>



Main Activity/Project Component	Components of Activity	Details
	<p>with ablutions and stores, contractors yards.</p> <ul style="list-style-type: none"> <li>» Establishment of internal access roads (permanent and temporary roads).</li> <li>» Clearance of vegetation at the footprint of each turbine.</li> <li>» Excavations for foundations.</li> </ul>	<p>be stockpiled, backfilled, where necessary, and/or spread on site and where necessary used latter for rehabilitation.</p>
<p>Establishment of lay down and hardstand areas on site</p>	<ul style="list-style-type: none"> <li>» Lay down areas (temporary footprint) at each turbine position for the storage of wind turbine components</li> <li>» Hardstand areas for crane lifting equipment.</li> <li>» Temporary lay down area for crane assembly.</li> <li>» Construction site offices.</li> </ul>	<ul style="list-style-type: none"> <li>» Each turbine needs a flat lay down area during the construction process for the storage of wind turbine components. This area can be rehabilitated after construction unless required during operation.</li> <li>» The hardstand area will need to accommodate the cranes required in tower/turbine assembly. Hardstand and lay down areas will be required to be established for the normal civil engineering construction equipment which will be required on site. A large hardstand area will be required at each position where the main lifting crawler crane may be required to be erected and/or disassembled. This area would be required to be compacted and levelled to accommodate the assembly crane, which would need to access the crawler crane from all sides.</li> <li>» Such areas to make use of already compacted areas as far as possible, such as roadways or other laydown areas.</li> </ul>
<p>Construct wind turbine foundations</p>	<ul style="list-style-type: none"> <li>» Concrete foundations at each turbine location (final dimensions to be defined by geotechnical survey of the site).</li> </ul>	<ul style="list-style-type: none"> <li>» <u>Foundation holes will be mechanically excavated and might use explosives where necessary, e.g. where the subsurface conditions don't allow for mechanical excavation (permits would be required for the latter – to be obtained by the Contractor(s)).</u></li> <li>» Shoring and safety barriers will be erected around open excavation.</li> <li>» Aggregate and cement to be transported from the closest centre to the development, with the establishment of a small concrete batching plant close to the activities.</li> </ul>

Main Activity/Project Component	Components of Activity	Details
Transport of components and equipment to site	<ul style="list-style-type: none"> <li>» Flatbed trucks will be used to transport all components to site:</li> <li>» The normal civil engineering construction equipment for the civil works (e.g. excavators, trucks, graders, compaction equipment, cement mixers, etc.).</li> <li>» The components required for the establishment of the substation (including transformers)                             <ul style="list-style-type: none"> <li>* Components required for the establishment of the power line (including towers and cabling)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>» Turbine units consist of a tower comprised of typically 4 segments, a nacelle, rotor and three blades.</li> <li>» Components of various specialised construction, lifting equipment and counter weights etc. are required on site (e.g. mobile assembly crane and a main crane) to erect the wind turbines.</li> <li>» Other components include components required for the establishment of the substation (including transformers) and those required for the establishment of the power line (including towers and cabling).</li> <li>» The wind turbine, including tower, will be brought to site by the supplier in sections. The individual components are defined as abnormal loads in terms of the Road Traffic Act (Act No 29 of 1989) by virtue of the dimensional limitations (abnormal length of the blades) and load limitations (i.e. the nacelle). The dimensional requirements of the load during the construction phase (length/height) may require alterations to the existing road infrastructure (widening on corners, removal of traffic islands), accommodation of street furniture (electricity, street lighting, traffic signals, telephone lines etc.) and protection of road-related structures (bridges, culverts, portal culverts, retaining walls etc.) as a result of abnormal loading. The equipment will be transported to the site using appropriate National and Provincial routes, and the dedicated access/haul road to the site itself. It is estimated that 10 trucks will be used for the transport of each turbine.</li> </ul>
Erect turbines	<ul style="list-style-type: none"> <li>» Large lifting crane used for lifting of large, heavy components</li> <li>» A small crane for the assembly of the rotor</li> </ul>	<ul style="list-style-type: none"> <li>» The large lifting crane will lift the tower sections into place, assisted by the smaller crane.</li> <li>» The nacelle, which contains the gearbox, generator and yawing mechanism, will then be placed onto the top of the assembled tower.</li> <li>» The rotor (i.e. the blades of the turbine) will then be assembled or partially assembled on the ground by the smaller crane. It will then be lifted to the nacelle by the large crane, and bolted in place.</li> </ul>

Main Activity/Project Component	Components of Activity	Details
		<p>Alternatively the blades may be lifted into position on the nacelle individually by the main crane.</p> <ul style="list-style-type: none"> <li>» It will take approximately 2-5 days to erect each turbine, although this will depend on the climatic conditions as a relatively wind-free day will be required for the installation of the rotor.</li> </ul>
Construct substations and associated ancillary infrastructure.	<ul style="list-style-type: none"> <li>» New <b>132 kV substation</b> will be connected to the proposed <b>132 kV overhead power line</b> which will connect to the newly constructed Ilanga Lethemba Substation (Solar Capital Substation) or alternatively into the Hydra Substation.</li> <li>» Substation components.</li> <li>» Security fencing around high-voltage (HV) Yard.</li> <li>» Workshop.</li> <li>» <u>Temporary site offices</u></li> <li>» <u>Operation and Maintenance building(s)</u></li> </ul>	<ul style="list-style-type: none"> <li>» Will require the clearing of vegetation and levelling of the development site and the excavation of foundations prior to construction.</li> <li>» A lay down area for building materials and equipment associated with these buildings will also be required.</li> <li>» The on-site substations will be constructed with a HV yard footprint of up to 100 m x 100 m.</li> <li>» The substation would be constructed as follows: <ul style="list-style-type: none"> <li>* <u>Step 1:</u> Survey of the site</li> <li>* <u>Step 2:</u> Site clearing and levelling and construction of access road to substation site</li> <li>* <u>Step 3:</u> Construction of terrace and foundations</li> <li>* <u>Step 4:</u> Assembly, erection and installation of equipment (including transformers)</li> <li>* <u>Step 5:</u> Connection of conductors to equipment</li> <li>* <u>Step 6:</u> Rehabilitation of any disturbed areas and protection of erosion sensitive areas.</li> </ul> </li> </ul>
Connection of the wind turbines to the on-site substations	<ul style="list-style-type: none"> <li>» Wind turbines</li> <li>» 33 kV underground (where practical) electrical cabling connecting each turbine to the substations.</li> </ul>	<ul style="list-style-type: none"> <li>» The installation of these cables will require the excavation of trenches, approximately 1 m in depth within which these cables can then be laid. The underground cables would follow the internal access roads as far as reasonably possible.</li> </ul>
Connect substations to power grid <sup>4</sup>	<ul style="list-style-type: none"> <li>» A new 132kV overhead power line</li> </ul>	<ul style="list-style-type: none"> <li>» The route for the power lines will be assessed, surveyed, and pegged</li> </ul>

<sup>4</sup> An application for a separate basic assessment process for the power line has been submitted to the DFFE.

Main Activity/Project Component	Components of Activity	Details
	feeding into the power grid	<p>prior to construction.</p> <ul style="list-style-type: none"> <li>» A servitude of approximately 32 m will be required for each of the power lines.</li> </ul>
Commissioning of the facility	<ul style="list-style-type: none"> <li>» Wind Energy Facility commissioning</li> </ul>	<ul style="list-style-type: none"> <li>» Prior to the start-up of a wind turbine, a series of checks and tests will be carried out, including both static and dynamic tests to make sure the turbine is working within appropriate limits.</li> <li>» Grid interconnection and unit synchronisation will be undertaken to confirm the turbine performance. Physical adjustments may be needed such as changing the pitch of the blades of the turbines.</li> </ul>
Undertake site rehabilitation	<ul style="list-style-type: none"> <li>» Remove all construction equipment from the site.</li> <li>» Rehabilitation of temporarily disturbed areas where practical and reasonable.</li> </ul>	<ul style="list-style-type: none"> <li>» On full commissioning of the facility, any access points to the site which are not required during the operation phase will be closed and prepared for rehabilitation.</li> </ul>
<b>Operation</b>		
Operation	<ul style="list-style-type: none"> <li>» Operation of turbines within the wind energy facility</li> </ul>	<ul style="list-style-type: none"> <li>» Once operational, the Renewable Energy Facility will be monitored remotely.</li> <li>» No permanent staff will be required on site for any extended period. It is anticipated that there will be full time security, maintenance and control room staff required on site.</li> <li>» Each turbine in the facility will be operational, except under circumstances of mechanical breakdown, extreme weather conditions, or maintenance activities.</li> </ul>
Maintenance	<p>Maintenance activities include:</p> <ul style="list-style-type: none"> <li>» Oil and grease – turbines;</li> <li>» Transformer oil – substation; and</li> <li>» Waste product disposal</li> </ul>	<ul style="list-style-type: none"> <li>» The wind turbines will be subject to periodic maintenance and inspection.</li> <li>» Periodic oil changes will be required and any waste products (e.g. oil) will be disposed of in accordance with relevant waste management legislation.</li> <li>» The turbine infrastructure is expected to have a lifespan of approximately 25 - 30 years, with maintenance.</li> </ul>

Main Activity/Project Component	Components of Activity	Details
<b>Decommissioning</b>		
Site preparation	<ul style="list-style-type: none"> <li>» Confirming the integrity of the access to the site to accommodate required equipment and lifting cranes.</li> <li>» Preparation of the site (e.g. lay down areas, construction platform)</li> <li>» Mobilisation of construction equipment</li> </ul>	<ul style="list-style-type: none"> <li>» Equipment associated with this facility would only be decommissioned once it has reached the end of its economic life. It is most likely that decommissioning activities of the infrastructure of the facility would comprise the disassembly and replacement of the turbines with more appropriate technology/infrastructure available at that time.</li> </ul>
Disassemble wind turbines	<ul style="list-style-type: none"> <li>» A large crane will be used to disassemble the turbine and tower sections.</li> </ul>	<ul style="list-style-type: none"> <li>» Turbine components would be reused, recycled or disposed of in accordance with regulatory requirements.</li> <li>» The hours of operation for noisy construction activities are guided by the Environment Conservation Act (noise control regulations). If the project requires construction work outside of the designated hours, regulatory authorities and affected stakeholders will be consulted and subsequent negotiations will be made to ensure the suitability of the revised activities (if applicable).</li> </ul>

## **2.5 Applicable Legislation**

The following legislation and guidelines have informed the scope and content of this EMP:

- » National Environmental Management Act (Act No 107 of 1998);
- » EIA Regulations, published under Chapter 5 of the NEMA (GN 982, GNR 983, GNR 984 and GNR 985 in Government Gazette 38282 of 4 December 2014).
- » Guidelines published in terms of the NEMA EIA Regulations, in particular:
  - \* Companion to the National Environmental Management Act (NEMA) Environmental Impact Assessment (EIA) Regulations of 2010 (Draft Guideline; DEA, 2010).
  - \* Public Participation in the EIA Process (DEA, 2010).
  - \* Integrated Environmental Management Information Series (published by DEA).
- » International guidelines – the Equator Principles and the International Finance Corporation and World Bank Environmental, Health, and Safety Guidelines for Wind Energy (2007).

Several other Acts, standards, or guidelines have also informed the project process and the scope of issues addressed and assessed for the project. A review of legislative requirements applicable to the proposed project is provided in **Table 2.2**.

**Table 2.2:** Relevant legislative permitting requirements applicable to the Wind Energy Facility Project EIA

Legislation / Policy / Guideline	Applicable Requirements	Relevant Authority	Compliance requirements
<b>National Legislation</b>			
National Environmental Management Act (Act No 107 of 1998)	<p>EIA Regulations have been promulgated in terms of Chapter 5. Activities which may not commence without an environmental authorisation are identified within these Regulations.</p> <p>In terms of Section 24(1) of NEMA, the potential impact on the environment associated with these listed activities must be considered, investigated, assessed and reported on to the competent authority (the decision-maker) charged by NEMA with granting of the relevant environmental authorisation.</p> <p>In terms of GN R543, R544, R545 and R546 of June 2010, a scoping and EIA process was required to be undertaken for the proposed project.</p>	<ul style="list-style-type: none"> <li>» DFFE</li> <li>» <u>Northern Cape Department of Agriculture, Environmental Affairs, Rural Development and Land Reform (DAEARD&amp;LR)</u></li> </ul>	<p>The listed activities triggered by the proposed Project has been identified and assessed in the EIA process.</p> <p>The EIA Report was submitted to the competent and commenting authority in support of the application for authorisation. Authorisation was issued on 08 May 2015.</p>
National Environmental Management Act (Act No 107 of 1998)	<p>In terms of the Duty of Care provision in S28(1) the project proponent must ensure that reasonable measures are taken throughout the life cycle of this project to ensure that any pollution or degradation of the environment associated with this project is avoided, stopped or minimised.</p> <p>In terms of NEMA, it has become the legal duty of a project proponent to consider a project holistically, and to consider the</p>	<p><u>DFFE</u> (as regulator of NEMA).</p>	<p>While no permitting or licensing requirements arise directly by virtue of the proposed project, this section will find application during the EIA phase and will continue to apply throughout the life cycle of the project.</p>

Legislation / Policy / Guideline	Applicable Requirements	Relevant Authority	Compliance requirements
<p>National Environmental Management: Waste Act (Act No 59 of 2008)</p>	<p>cumulative effect of a variety of impacts.</p> <p>The Minister may by notice in the Gazette publish a list of waste management activities that have, or are likely to have, a detrimental effect on the environment.</p> <p>The Minister may amend the list by –</p> <ul style="list-style-type: none"> <li>» Adding other waste management activities to the list.</li> <li>» Removing waste management activities from the list.</li> <li>» Making other changes to the particulars on the list.</li> </ul> <p>In terms of the Regulations published in terms of this Act (GN 912 of November 2013), a Basic Assessment or Environmental Impact Assessment is required to be undertaken for identified listed activities.</p> <p>Any person who stores waste must at least take steps, unless otherwise provided by this Act, to ensure that:</p> <ul style="list-style-type: none"> <li>» The containers in which any waste is stored, are intact and not corroded or in any other way rendered unfit for the safe storage of waste.</li> <li>» Adequate measures are taken to prevent accidental spillage or leaking.</li> <li>» The waste cannot be blown away.</li> <li>» Nuisances such as odour, visual</li> </ul>	<p><u>DFFE</u> (hazardous waste)</p> <p>Provincial Department of Environmental Affairs (general waste)</p>	<p>No waste disposal site is to be associated with the project. In terms of GNR921, no waste management license is required for this project.</p> <p>Waste handling, storage and disposal during construction and operation is required to be undertaken in accordance with the requirements of the Act, as detailed in this EMPr.</p>



Legislation / Policy / Guideline	Applicable Requirements	Relevant Authority	Compliance requirements
	<p>impacts and breeding of vectors do not arise; and</p> <p>» Pollution of the environment and harm to health are prevented.</p>		
<p>Environment Conservation Act (Act No 73 of 1989)</p>	<p>In terms of section 25 of the ECA, the national noise-control regulations (GN R154 in Government Gazette No. 13717 dated 10 January 1992) were promulgated. The NCRs were revised under Government Notice Number R. 55 of 14 January 1994 to make it obligatory for all authorities to apply the regulations. Subsequently, in terms of Schedule 5 of the Constitution of South Africa of 1996, legislative responsibility for administering the noise control regulations was devolved to provincial and local authorities. Provincial Noise Control Regulations exist in the Free State, Western Cape and Gauteng provinces, but the Northern Cape province have not yet adopted provincial regulations in this regard.</p> <p>Allows the Minister of Environmental Affairs to make regulations regarding noise, among other concerns</p>	<p><u>DFFE</u> <u>DAEARD&amp;LR</u> Emthanjeni Local Municipality and Renosterberg Local Municipality</p>	<p>Noise impacts are expected to be associated with the project and are not likely to present a significant intrusion to the local community. There is no requirement for a noise permit in terms of the legislation.</p>
<p>National Water Act (Act No 36 of 1998)</p>	<p>Water uses under S21 of the Act must be licensed unless such water use falls into one of the categories listed in S22 of the Act or falls under general authorisation in terms of S39 and GN 1191 of GG 20526 October 1999.</p>	<p><u>Department of Water and Sanitation (DWS)</u></p>	<p>A Water Use Authorisation is required as some drainage lines on the site will be impacted upon by road crossings. Application for a WUL or GA (<u>whichever is deemed to be applicable</u>) will be made with the DWS in terms of Section 21 of the Act.</p>

Legislation / Policy / Guideline	Applicable Requirements	Relevant Authority	Compliance requirements
	<p>In terms of Section 19, the project proponent must ensure that reasonable measures are taken throughout the life cycle of this project to prevent and remedy the effects of pollution to water resources from occurring, continuing or recurring.</p>		<p>Water will be extracted from groundwater (borehole on site) for use within the facility and during construction.</p>
<p>Minerals and Petroleum Resources Development Act (Act No 28 of 2002)</p>	<p>A mining permit or mining right may be required where a mineral in question is to be mined (e.g. materials from a borrow pit) in accordance with the provisions of the Act.</p> <p>Requirements for Environmental Management Programmes and Environmental Management Plans are set out in S39 of the Act.</p>	<p>Department of Mineral Resources and Energy (DMRE)</p>	<p>Should material not be sourced from a commercial source and a borrow pit(s) be considered necessary, the Contractor shall source and apply for the relevant permit from the DMRE.</p>
<p>National Environmental Management: Air Quality Act (Act No 39 of 2004)</p>	<p>Measures in respect of dust control (S32) and National Dust Control Regulations of November 2013.</p> <p>Measures to control noise (S34) - no regulations promulgated yet.</p>	<p>DFFE Emthanjeni Local Municipality and Renosterberg Local municipality</p>	<p>No permitting or licensing requirements arise from this legislation.</p> <p>The Act provides that an air quality officer may require any person to submit an atmospheric impact report if there is reasonable suspicion that the person has failed to comply with the Act. The air quality officer may require a dust monitoring programme as per the Regulations for dust control. This EMPr however makes provision for managing and mitigating potential dust impacts.</p>
<p>National Heritage Resources Act (Act No 25 of 1999)</p>	<p>Section 38 states that Heritage Impact Assessments (HIAs) are required for certain kinds of development including</p>	<p>South African Heritage Resources Agency (SAHRA) Northern Cape Heritage</p>	<p>A Heritage and Paleontological Impact Assessment (HIA) was undertaken as part of the EIA Process to identify heritage sites. <u>The heritage walkthrough</u></p>

Legislation / Policy / Guideline	Applicable Requirements	Relevant Authority	Compliance requirements
	<p>» the construction of a road, power line, pipeline, canal or other similar linear development or barrier exceeding 300 m in length;</p> <p>» any development or other activity which will change the character of a site exceeding 5 000 m<sup>2</sup> in extent.</p> <p>The relevant Heritage Resources Authority must be notified of developments such as linear developments (such as roads and power lines), bridges exceeding 50 m, or any development or other activity which will change the character of a site exceeding 5 000 m<sup>2</sup>; or the re-zoning of a site exceeding 10 000 m<sup>2</sup> in extent. This notification must be provided in the early stages of initiating that development, and details regarding the location, nature and extent of the proposed development must be provided.</p> <p>Standalone HIAs are not required where an EIA is carried out as long as the EIA contains an adequate HIA component that fulfils the provisions of Section 38. In such cases only those components not addressed by the EIA should be covered by the heritage component.</p>	<p>Resources Authority</p>	<p><u>survey was undertaken and related report has been completed and included in the EMPr.</u> The relevant mitigation measures are included in this EMPr,</p>
<p>National Environmental Management: Biodiversity Act (Act No 10 of 2004)</p>	<p>» Provides for the MEC/Minister to identify any process or activity in such a listed ecosystem as a threatening</p>	<p>DFFE <u>DAEARD&amp;LR</u></p>	<p>As the applicant will not carry out any restricted activity, as is defined in Section 1 of the Act, no permit is required to be obtained in this regard.</p>

Legislation / Policy / Guideline	Applicable Requirements	Relevant Authority	Compliance requirements
	<p>process (S53)</p> <ul style="list-style-type: none"> <li>» A list of threatened &amp; protected species has been published in terms of S 56(1) - Government Gazette 29657.</li> <li>» Three government notices have been published, i.e. GN R 150 (Commencement of Threatened and Protected Species Regulations, 2007), GN R 151 (Lists of critically endangered, vulnerable and protected species) and GN R 152 (Threatened or Protected Species Regulations).</li> <li>» Provides for listing threatened or protected ecosystems, in one of four categories: critically endangered (CR), endangered (EN), vulnerable (VU) or protected. The first national list of threatened terrestrial ecosystems has been gazetted, together with supporting information on the listing process including the purpose and rationale for listing ecosystems, the criteria used to identify listed ecosystems, the implications of listing ecosystems, and summary statistics and national maps of listed ecosystems (National Environmental Management: Biodiversity Act: National list of ecosystems that are threatened and in need of protection, (G 34809, GN 1002), 9 December</li> </ul>		<p>A Specialist Ecological Assessment was undertaken as part of the Environmental Impact Assessment process. As such the potential occurrence of critically endangered, endangered, vulnerable, and protected species, as well as critically endangered (CR), endangered (EN), vulnerable (VU) or protected ecosystems and species and the potential for them to be affected has been considered.</p>

Legislation / Policy / Guideline	Applicable Requirements	Relevant Authority	Compliance requirements
	<p>2011).</p> <ul style="list-style-type: none"> <li>» This Act also regulates alien and invader species.</li> <li>» Under this Act, a permit would be required for any activity which is of a nature that may negatively impact on the survival of a listed protected species.</li> </ul> <p>The Proponent has a responsibility for:</p> <ul style="list-style-type: none"> <li>» The conservation of endangered ecosystems and restriction of activities according to the categorisation of the area (not just by listed activity as specified in the EIA regulations).</li> <li>» Promote the application of appropriate environmental management tools in order to ensure integrated environmental management of activities thereby ensuring that all development within the area are in line with ecological sustainable development and protection of biodiversity.</li> <li>» Limit further loss of biodiversity and conserve endangered ecosystems.</li> </ul>		
National Environmental Management: Biodiversity Act 10 of 2004	GNR 598: The Alien and Invasive Species (AIS) Regulations provides for the declaration of weeds and invader plants.	Department of Agriculture, Forestry and Fisheries (DAFF) <a href="#">DFFE</a>	This Act will find application throughout the life cycle of the project. In this regard, soil erosion prevention and soil conservation strategies are included in this EMPr. In addition, weed control and management has also been included in this EMPr.
National Veld and Forest	In terms of S13 the landowner would be	DAFF	While no permitting or licensing requirements arise

Legislation / Policy / Guideline	Applicable Requirements	Relevant Authority	Compliance requirements
Fire Act (Act 101 of 1998)	<p>required to burn firebreaks to ensure that should a veldfire occur on the property, that it does not spread to adjoining land.</p> <p>In terms of S13 the landowner must ensure that the firebreak is wide and long enough to have a reasonable chance of preventing the fire from spreading, not causing erosion, and is reasonably free of inflammable material.</p> <p>» In terms of S17, the applicant must have such equipment, protective clothing, and trained personnel for extinguishing fires.</p>	<p><u>DFFE</u></p>	<p>from this legislation, this Act will find application during the construction and operational phase of the project The relevant management and mitigation measures has been included in this EMPr.</p>
Conservation of Agricultural Resources Act (CARA) (Act No 43 of 1983)	<p>» Prohibition of the spreading of weeds (S5).</p> <p>» Classification of categories of weeds &amp; invader plants (Regulation 15 of GN R1048) &amp; restrictions in terms of where these species may occur.</p> <p>» Requirement &amp; methods to implement control measures for alien and invasive plant species (Regulation 15E of GN R1048).</p>	<p>DAFF <u>DFFE</u></p>	<p>An Ecology study was undertaken as part of the EIA Report. The relevant mitigations measures were identified and are included in this EMPr.</p>
National Forests Act (Act No 84 of 1998)	<p>Protected trees: According to this act, the Minister may declare a tree, group of trees, woodland or a species of trees as protected. The prohibitions provide that ' no person may cut, damage, disturb, destroy or remove any protected tree, or collect, remove, transport, export,</p>	<p>» DAFF » <u>DAEARD&amp;LR</u></p>	<p>A permit or license is required for the destruction of protected tree species and/or indigenous tree species within a natural forest.</p> <p>No protected tree species or indigenous tree species were identified on site, <u>requiring a permit under the National Forests Act.</u></p>

Legislation / Policy / Guideline	Applicable Requirements	Relevant Authority	Compliance requirements
	<p>purchase, sell, donate or in any other manner acquire or dispose of any protected tree, except under a licence granted by the Minister<sup>1</sup>.</p> <p>Forests: Prohibits the destruction of indigenous trees in any natural forest without a licence.</p>		
<p>Aviation Act (Act No 74 of 1962) 13<sup>th</sup> amendment of the Civil Aviation Regulations (CARS) 1997</p>	<p>Any structure exceeding 45m above ground level or structures where the top of the structure exceeds 150m above the mean ground level, the mean ground level considered to be the lowest point in a 3km radius around such structure.</p> <p>Structures lower than 45m, which are considered as a danger to aviation shall be marked as such when specified.</p> <p>Overhead wires, cables etc., crossing a river, valley or major roads shall be marked and in addition their supporting towers marked and lighted if an aeronautical study indicates it could constitute a hazard to aircraft.</p> <p>Section 14 of Obstacle limitations and marking outside aerodrome or heliport – CAR Part 139.01.33 relates specifically to appropriate marking of wind energy facilities.</p>	<p>Civil Aviation Authority (CAA)</p>	<p>While no permitting or licence requirements arise from the legislation, this Act will find application during the operational phase of the project. Appropriate marking is required to meet the specifications as detailed in the CAR Part 139.01.33.</p>
<p>Hazardous Substances Act (Act No 15 of 1973)</p>	<p>This Act regulates the control of substances that may cause injury, or ill health, or death by reason of their toxic, corrosive, irritant, strongly sensitising or inflammable nature or the generation of</p>	<p>Department of Health Emthanjeni Local Municipality and Renosterberg Local municipality</p>	<p>It is necessary to identify and list all the Group I, II, III and IV hazardous substances that may be on the site and in what operational context they are used, stored or handled. If applicable, a license is required to be obtained from the Department of</p>

Legislation / Policy / Guideline	Applicable Requirements	Relevant Authority	Compliance requirements
	<p>pressure thereby in certain instances and for the control of certain electronic products. To provide for the rating of such substances or products in relation to the degree of danger; to provide for the prohibition and control of the importation, manufacture, sale, use, operation, modification, disposal or dumping of such substances and products.</p> <ul style="list-style-type: none"> <li>» Group I and II: Any substance or mixture of a substance that might by reason of its toxic, corrosive etc., nature or because it generates pressure through decomposition, heat or other means, cause extreme risk of injury etc., can be declared to be Group I or Group II hazardous substance;</li> <li>» Group IV: any electronic product;</li> <li>» Group V: any radioactive material.</li> </ul> <p>The use, conveyance or storage of any hazardous substance (such as distillate fuel) is prohibited without an appropriate license being in force.</p>		<p>Health.</p>
<p>National Road Traffic Act (Act No 93 of 1996)</p>	<p>The Technical Recommendations for Highways (TRH 11): "Draft Guidelines for Granting of Exemption Permits for the Conveyance of Abnormal Loads and for other Events on Public Roads" outline the rules and conditions which apply to the transport of abnormal loads and vehicles</p>	<p>Provincial Department of Transport (provincial roads) South African National Roads Agency Limited (national roads)</p>	<p>An abnormal load/vehicle permit may be required to transport the various components to site for construction. These include:</p> <ul style="list-style-type: none"> <li>» Route clearances and permits will be required for vehicles carrying abnormally heavy or abnormally dimensioned loads.</li> <li>» Transport vehicles exceeding the dimensional</li> </ul>



Legislation / Policy / Guideline	Applicable Requirements	Relevant Authority	Compliance requirements
	<p>on public roads and the detailed procedures to be followed in applying for exemption permits are described and discussed.</p> <p>Legal axle load limits and the restrictions imposed on abnormally heavy loads are discussed in relation to the damaging effect on road pavements, bridges and culverts.</p> <p>The general conditions, limitations and escort requirements for abnormally dimensioned loads and vehicles are also discussed and reference is made to speed restrictions, power/mass ratio, mass distribution and general operating conditions for abnormal loads and vehicles. Provision is also made for the granting of permits for all other exemptions from the requirements of the National Road Traffic Act and the relevant Regulations.</p>		<p>limitations (length) of 22m.</p> <ul style="list-style-type: none"> <li>» Depending on the trailer configuration and height when loaded, some of the power station components may not meet specified dimensional limitations (height and width).</li> </ul>
<p><u>GNR 805 of 29 May 2019 under the Astronomy Geographic Advantage Act, No. 21 of 2007</u></p>	<p><u>These regulations apply to specified activities within the Sutherland Central Astronomy Advantage Area declared for optical astronomy purposes and related scientific endeavours.</u></p> <p><u>The restriction of the specified activities within the Sutherland Central Astronomy Advantage Area is intended to protect</u></p>	<p><u>Department of Science and Innovation</u></p>	<p><u>Requirements in terms of the Regulations for the SCAAA, the following is applicable for the project:</u></p> <ul style="list-style-type: none"> <li>» <u>Any person who intends to conduct any activity within the Sutherland Central Astronomy Advantage Area that may involve any earth works creating dust, must submit an application on the prescribed form.</u></li> <li>» <u>Lighting for the wind farm (including obstacle lighting) must be planned and managed as per</u></li> </ul>

Legislation / Policy / Guideline	Applicable Requirements	Relevant Authority	Compliance requirements
	<p><u>the optical astronomy observations carried out within the Sutherland Core Astronomy Advantage Area from a detrimental impact.</u></p> <p><u>The regulation sets out maximum lighting levels for specified activities within the Sutherland Central Astronomy Advantage Area, including establishing a minimum acceptable night time brightness levels, as well as prescribed conditions for lighting activities and the nature of lighting used. In addition, dust and wind turbine conditions are provided within the Sutherland Central Astronomy Advantage Area. The regulation state that:</u></p> <p><u>(1) Unless authorised by the management authority, no person may allow any general area lighting and outdoor recreational lighting activities within the Sutherland Central Astronomy Advantage Area to cause the average night sky brightness stated in sub -regulation 3(2) to be exceeded within the Sutherland Core Astronomy Advantage Area.</u></p> <p><u>In addition to:</u></p> <p><u>5. Activities creating air pollution</u></p>		<p><u>the requirements of the Regulations.</u></p> <p><u>All construction activities must be in accordance with these regulations by obtaining earthwork approval from the DSI prior to construction commencing and adhering to lighting types and levels on site as specified in the minimum standards of these regulations.</u></p>

Legislation / Policy / Guideline	Applicable Requirements	Relevant Authority	Compliance requirements
	<p><u>(1) Any person who intends to conduct any activity within the Sutherland Central Astronomy Advantage Area that may involve any earth works creating dust, must submit an application on the prescribed form (Annexure B), a copy of which can be obtained from the management authority, for approval by the management authority prior to commencing such activities.</u></p> <p><u>Fines of up to R 200 000.00 are determined for any intentional contravention of the regulations</u></p>		
<b>Provincial Legislation/ Policies / Plans</b>			
Northern Cape Nature Conservation Act, 2009	<p>This Act provides for the sustainable utilisation of wild animals, aquatic biota and plants; provides for the implementation of the Convention on International Trade in Endangered Species of Wild Fauna and Flora; provides for offences and penalties for contravention of the Act; provides for the appointment of nature conservators to implement the provisions of the Act; and provides for the issuing of permits and other authorisations. Amongst other regulations, the following may apply to the current project:</p> <ul style="list-style-type: none"> <li>» Boundary fences may not be altered in such a way as to prevent wild animals from freely moving onto or off of a property;</li> </ul>	<u>DAEARD&amp;LR</u>	<p>A permit is required for any activities which involve species listed under schedule 1 or 2. The NC DENC permit office provides an integrated permit which can be used for all provincial and Threatened or Protected Species (TOPS)-related permit requirements.</p> <p>Provincially protected plant species were found within the study area. <u>All protected plant species, (protected in terms of the Northern Cape Nature Conservation Act (No. 9 of 2009) legislation) identified on the site are listed in the specialist report (Dec 2020), the Ecological Walkthrough Report dated June 20121 and disturbance of the listed vegetation will require the need for a permit application.</u></p>

Legislation / Policy / Guideline	Applicable Requirements	Relevant Authority	Compliance requirements
	<ul style="list-style-type: none"> <li>» Aquatic habitats may not be destroyed or damaged;</li> <li>» The owner of land upon which an invasive species is found (plant or animal) must take the necessary steps to eradicate or destroy such species.</li> </ul> <p>The Act provides lists of protected species for the Province.</p>		
<b>Local Legislation / Policies / Plans</b>			
<p>Emthanjeni Local Municipality and Renosterberg Local municipality's Integrated Development PlanS (IDP)</p>	<ul style="list-style-type: none"> <li>» The IDP notes that the Karoo Hoogland is primarily an agricultural community. Conservation of the environment and sustainable development are identified as primary points of departure in policy.</li> <li>» The main socio-economic developmental issues are identified as widespread poverty, the lack of employment opportunities, low adult literacy levels, and general the lack of diversified skills amongst the bulk of the population. School dropout rates are pronounced. The IDP describes general living conditions in the LM as "some of the worst in the country".</li> </ul>	<p>Emthanjeni Local Municipality and Renosterberg Local Municipality</p>	<p>New developments in the municipality to be in line with the IDP.</p>

**Table 2.3:** Standards applicable to the Castle Wind Energy Facility

<b>Theme</b>	<b>Standard</b>	<b>Summary</b>
Air	<u>South African National Standard (SANS) 69</u>	<u>Framework for setting and implementing national ambient air quality standards</u>
	<u>SANS 1929: Ambient Air Quality</u>	<u>Sets limits for common pollutants</u>
Noise	<u>SANS 10328:2003: Methods for Environmental Noise Impact Assessments</u>	<u>General procedure used to determine the noise impact</u>
	<u>SANS 10103:2008: The Measurement and Rating of Environmental Noise with Respect to Land Use, Health, Annoyance and Speech Communication</u>	<u>Provides noise impact criteria</u>
	<u>National Noise Control Regulations</u>	<u>Provides noise impact criteria</u>
	<u>SANS 10210: Calculating and Predicting Road Traffic Noise</u>	<u>Provides guidelines for traffic noise levels</u>
Waste	<u>DWAF (1998) Waste Management Series. Minimum Requirements for the Handling, Classification and Disposal of Hazardous Waste</u>	<u>DWAF Minimum Requirements</u>
	<u>National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) – National norms and standard for the storage of waste.</u>	<ul style="list-style-type: none"> <li>» <u>Provides uniform national approach relating the management of waste facilities</u></li> <li>» <u>Ensure best practice in management of waste storage</u></li> <li>» <u>Provides minimum standards for the design and operation of new and existing waste storage</u></li> </ul>
Water	<u>Best Practise Guideline (G1) Storm Water Management DWA 2006</u>	<u>Provides guidelines to the management of storm water</u>
	<u>South African Water Quality Guidelines</u>	<u>Provides water quality guidelines</u>
<u>Economical, Environmental and Social</u>	<u>Equator Principles, July 2020</u>	<u>The Equator Principles are intended to serve as a common baseline and framework for financial institutions to identify, assess and manage environmental and social risks when financing Projects.</u>

## CHAPTER 3: STRUCTURE OF THIS EMPR

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The first two chapters provide background to the EMPr and the proposed project. The chapters which follow consider the following:

- » Planning and design activities
- » Construction activities
- » Operation activities
- » Decommissioning activities

These chapters set out the procedures necessary for the developer to achieve environmental compliance. For each of the phases of implementation for the wind energy facility project, an over-arching environmental **goal** is stated. In order to meet this goal, a number of **objectives** are listed. The management programme has been structured in table format in order to show the links between the goals for each phase and their associated objectives, activities/risk sources, mitigation actions monitoring requirements and performance indicators. A specific environmental management programme table has been established for each environmental objective. The information provided within the EMPr table for each objective is illustrated below:

**OBJECTIVE: Description of the objective, which is necessary in order to meet the overall goals; these take into account the findings of the environmental impact assessment specialist studies**

<b>Project component/s</b>	List of project components affecting the objective, i.e.: <ul style="list-style-type: none"><li>» Wind turbines</li><li>» Access roads</li><li>» Substations</li></ul>
<b>Potential Impact</b>	Brief description of potential environmental impact if objective is not met
<b>Activity/risk source</b>	Description of activities which could impact on achieving objective
<b>Mitigation: Target/Objective</b>	Description of the target; include quantitative measures and/or dates of completion

Mitigation: Action/control	Responsibility	Timeframe
List specific action(s) required to meet the mitigation target/objective described above.	Who is responsible for the measures	Time periods for implementation of measures

<b>Performance Indicator</b>	Description of key indicator(s) that track progress/indicate the effectiveness of the management plan.
<b>Monitoring</b>	Mechanisms for monitoring compliance; the key monitoring actions required to check whether the objectives are being achieved, taking into consideration responsibility, frequency, methods and reporting.

The objectives and EMPr tables are required to be reviewed and possibly modified throughout the life of the facility whenever changes, such as the following, occur:

- » Planned activities change (i.e. in terms of the components of the facility).
- » Modification to or addition to environmental objectives and targets.
- » Additional or unforeseen environmental impacts are identified and additional measures are required to be included in the EMPr to prevent deterioration or further deterioration of the environment.
- » Relevant legal or other requirements are changed or introduced.
- » Significant progress has been made on achieving an objective or target such that it should be re-examined to determine if it is still relevant, should be modified, etc.

Any amendments must be approved by the Competent Authority (i.e. DFFE) prior to implementation, unless these are required to address an emergency situation.

### 3.1. Project Team

This EMPr was compiled by:

EMPr Compilers	
Tebogo Mapinga	Savannah Environmental
Karen Jodas	Savannah Environmental
Hermien Slabbert	Savannah Environmental
Thalita Koster	Savannah Environmental
Jo-Anne Thomas	Savannah Environmental
Input from Specialists	
Ecology	Simon Todd of Simon Todd Consulting <u>and The Biodiversity Company</u>
Avifauna	Jon Smallie of WildSkies Ecological Services
Bats	Werner Marias of Animalia <sup>5</sup> <u>and Low de Vries of Volant Environmental</u>

<sup>5</sup> It must be noted that the original specialists who undertook the EIA studies have been used for these assessments as far as possible. However, where the original specialists were not available for whatever reason, suitably qualified and experienced specialists have been used to provide an assessment of the proposed amendments.

	Jonathan Aronson of Arcus Consulting (2019 amendment)
Soils, erosion and agricultural potential	Johan van Tol of Hydro Pedological Solutions
Visual	Lourens du Plessis of MetroGIS
Heritage	Jaco van der Walt of Heritage Contracts and Archaeological Consulting CC <u>and Jenna Lavin of CTS Heritage</u>
Palaeontology	Barry Millstead
Noise	Morne de Jager of Enviro Acoustic Research
Social Impact	Tony Barbour (Environmental Consultant and Researcher)
Freshwater	Tony Belcher and Dana Grobler (Blue Science) <u>and The Biodiversity Company</u>

The Savannah Environmental team have extensive knowledge and experience in environmental impact assessments and environmental management and have managed and drafted Environmental Management Programmes for other wind energy facility projects throughout South Africa. In addition, they have been involved in compliance monitoring of major construction projects in South Africa.



## **CHAPTER 4: MANAGEMENT PROGRAMME FOR THE WIND ENERGY FACILITY: PLANNING & DESIGN**

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### **4.1. Goal for Pre-Construction**

**Overall Goal for Pre-Construction (Planning and Design):** Undertake the pre-construction (planning and design) phase of the Wind Energy Facility in a way that:

- » Ensures that the design of the facility responds to the identified environmental constraints and opportunities.
- » Ensures that pre-construction activities are undertaken in accordance with all relevant legislative requirements
- » Ensures that adequate regard has been taken of any landowner concerns and that these are appropriately addressed through design and planning (where appropriate).
- » Ensures that the best environmental options are selected for the project.
- » Enables the wind energy facility construction activities to be undertaken without significant disruption to other land uses in the area.

In order to meet this goal, the following objectives have been identified, together with necessary actions and monitoring requirements.

### **4.2. Objectives**

**OBJECTIVE 1: To ensure that the design of the facility responds to the identified environmental constraints and opportunities**

From the specialist investigations undertaken for the proposed Castle Wind Energy Facility development site, areas of high sensitivity were identified (refer to Figure 1.1). The major sensitive features of the site are the larger drainage lines which are fairly well developed, with significant amounts of tall woody biomass which contrasts with the surrounding landscape. The steeper, south-facing slopes are also considered sensitive on account of their woody biomass and more mesic environment, while the less steep rocky areas are considered moderately sensitive on account of the presence of a variety of species of conservation concern. The remaining flats and gentle slopes are lower sensitivity and typically consist of low shrubland or grassy shrubland representative of the Northern Upper Karoo vegetation type. Although the majority of turbines are located within these lower sensitivity areas, there are some turbines located within the moderately sensitive rocky areas. No turbines are located on very steep slopes or within drainage lines.

Nine heritage sites were recorded within the study area consisting of six Stone Age sites (Site 1, 3, 4, 6, 7, 9), a stone kraal (Site 2 that is a no-go area in development with a 100m buffer from the kraal wall) and two historical sites consisting of porcelain, glass and metal artefacts (Site 5) as well as historical/recent exploration or quarrying (Site 8). A further total of three find spots were recorded. Again, assemblages at the locations are mixed, mainly consisting of Middle Stone Age (MSA) and Late Stone Age (LSA) artefacts with some Early Stone Age (ESA) artefacts recorded. The latter are mostly heavily weathered, testifying to their prolonged exposure. No graves were observed in the study area. The nine heritage sites will not be impacted on by the proposed development.

<b>Project component/s</b>	<ul style="list-style-type: none"> <li>» Wind turbines;</li> <li>» Access roads and crane hard standings;</li> <li>» Substation;</li> <li>» Service Building(s); and</li> <li>» Associated infrastructure.</li> </ul>
<b>Potential Impact</b>	» Design fails to respond optimally to the identified environmental considerations
<b>Activities/risk sources</b>	<ul style="list-style-type: none"> <li>» Positioning of turbines and alignment of access roads and underground cabling</li> <li>» Positioning of substation</li> <li>» Positioning of buildings</li> <li>» Construction and design of watercourse crossings</li> <li>» Pre-construction activities, e.g. geotechnical investigations</li> </ul>
<b>Mitigation: Target/Objective</b>	» To ensure that the design of the facility responds to the identified environmental constraints and opportunities

<b>Mitigation: Action/control</b>	<b>Responsibility</b>	<b>Timeframe</b>
<u>The developer to finalise layout of all components, and submit to DFFE for approval as might be required by the EA.</u>	Castle Wind Farm (Pty) Ltd / Contractor(s)	Prior to construction
<u>A qualified heritage and avifauna specialists must be appointed to ground-truth the development footprint and their recommendation must inform the final layout and EMPr which must submitted to the DFFE for approval</u>	Castle Wind Farm (Pty) Ltd / Contractor(s)	Prior to construction
<u>Vegetation clearance must be limited to the required footprint</u>	Castle Wind Farm (Pty) Ltd / Contractor(s)	Design
<u>Construction activities must be restricted to demarcated areas to restrict impact on vegetation, birds and animals.</u>	Castle Wind Farm (Pty) Ltd / Contractor(s)	Prior to construction
<u>"No-go" areas must be clearly demarcated (using fencing and appropriate signage) before construction commences.</u>	Castle Wind Farm (Pty) Ltd / Contractor(s)	Prior to construction

Mitigation: Action/control	Responsibility	Timeframe
Consider design level mitigation measures recommended by the specialists, especially with respect to visual aesthetics, noise, flora, ecology, avifauna, bats, palaeontological sites and heritage sites, as detailed within the EIA report and relevant appendices.	Engineering Design Consultant / turbine supplier Castle Wind Farm (Pty) Ltd	Tender design, design review stage
As far as possible, access roads and cable trenches which could potentially impact on sensitive areas should be shifted in order to avoid these areas of high sensitivity (i.e. best practice is impact avoidance). Where this is not possible, alternative mitigation measures as detailed in this report must be implemented.	Engineering Design Consultant Castle Wind Farm (Pty) Ltd	Tender design, design review stage
All species of special concern (SSC) must be identified, and every effort must be made to rescue them.	Castle Wind Farm (Pty) Ltd/ Specialist	Prior to construction
A "Plant and Rescue and Protection" plan (Refer to <b>Appendix C</b> ) which allows for the maximum transportation of conservation important species from areas to be transformed must be compiled by a vegetation specialist familiar with the site in consultation with the ECO. This plan must be implemented prior to commencement of the construction phase	Castle Wind Farm (Pty) Ltd	Prior to construction
Align underground cables and internal access roads as far as possible along existing infrastructure and disturbances. Any access roads adjacent to a wetland feature should also remain outside of the 75m buffer zone as far as possible	Castle Wind Farm (Pty) Limited	Design
A buffer of at least 35m (from centre of stream for a smaller drainage lines and from the top of a bank for larger tributaries) should be maintained adjacent to the identified freshwater features, and 75m for the pans and wetland areas.	Castle Wind Farm (Pty) Limited	Design
A walk-through survey of final infrastructure positions for the wind energy facility and associated infrastructure (including the power line) should be undertaken by a specialist ecologist and heritage specialist prior to the commencement of construction. The EMP for construction must be updated to include site-specific information and specifications resulting from the final walk-through surveys. This EMP must be submitted to DFFE for approval prior to the commencement of construction.	Specialists	Final design phase

Mitigation: Action/control	Responsibility	Timeframe
Should the layout (or type of wind turbines used) change significantly during the final design, the new layout must be submitted to the Department and it is recommended that the new layout be remodelled/reviewed in terms of the potential environmental impacts by an independent acoustics specialist.	Castle Wind Farm (Pty) Ltd	Design phase
<u>The results of the pre-construction bird monitoring programme must inform the final layout and the construction schedule of the energy facility.</u>	<u>Castle Wind Farm (Pty) Ltd Specialist</u>	<u>Prior to construction</u>
<u>A 3km no-go buffer has been identified around each of the known Verreux's Eagle nests. No new infrastructure may be constructed within these areas. There are currently three turbines inside this buffer area and these are to be relocated during micro-siting.</u>	<u>Castle Wind Farm (Pty) Ltd</u>	<u>Design phase</u>
<u>Siting of turbines should adhere to &gt;500m setbacks from large water bodies, riparian vegetation and rocky crevices, if and where high bat occurrence is found after monitoring</u>	<u>Castle Wind Farm (Pty) Ltd</u>	<u>Design phase</u>
A detailed geotechnical investigation is required for the design phase for all infrastructure components.	Castle Wind Farm (Pty) Ltd	Design phase
Implement a stormwater management plan (Refer to <b>Appendix F</b> ) for hard/compacted surfaces (e.g. substation footprints) as part of the final design of the project (refer to <b>Appendix K</b> )	Castle Wind Farm (Pty) Ltd	Design phase
Make use of existing roads where possible when planning the access road layout for the facility.	Relevant specialists Castle Wind Farm (Pty) Ltd ECO/Contractor	Design phase
Obtain any additional environmental permits required (e.g. water use license, protected tree and protected plant permits, etc.). Copies of permits/licenses must be submitted to the Director: Environmental Impact Evaluation at the DFFE.	Castle Wind Farm (Pty) Ltd	Design phase
Mining permit/license to be obtained for any borrow pits to be established for the project (if applicable).	Castle Wind Farm (Pty) Ltd	Design phase
Obtain required abnormal load permits for transportation of project components to site.	Castle Wind Farm (Pty) Ltd /contractor	Design phase
The noise emission specifications of wind turbine generators should be considered when selecting the equipment in order to ensure that noise impacts are minimised as far as possible.	Castle Wind Farm (Pty) Ltd	Design phase
Compile a comprehensive storm water	Castle Wind Farm	Design phase

Mitigation: Action/control	Responsibility	Timeframe
management plan for hard surfaces as part of the final design of the project. This must include appropriate means for the handling of stormwater within the site, e.g. separate clean and dirty water streams around the plant, install stilling basins to capture large volumes of run-off, trapping sediments, and reduce flow velocities (i.e. water used when washing the mirrors), as well as appropriate drainage around the site.	(Pty) Ltd	
Plan the placement of lay-down areas and temporary construction accommodation in order to minimise vegetation clearing.	Castle Wind Farm (Pty) Ltd	Design phase
Ensure that proper planning is undertaken regarding the placement of lighting structures for the substation and that light fixtures only illuminate areas inside the substation site.	Castle Wind Farm (Pty) Ltd	Design
A lighting engineer must be consulted to assist in the planning and placement of light fixtures in order to reduce visual impacts associated with glare and light trespass. In addition, the possibility of motion activated security lighting should be investigated. This will allow for a predominantly dark site to be lit only as required.	Castle Wind Farm (Pty) Ltd	Design
Aviation warning lights must be planned on turbine hub or such measures required by the Civil Aviation Authority. Indications are that the facility may not be required to fit a light to each turbine, but rather place synchronous flashing lights on the turbines representing the outer perimeter of the facility.	Castle Wind Farm (Pty) Ltd	Design
ECO to be appointed prior to the commencement of any authorised activities. Once appointed the name and contact details of the ECO must be submitted to the Director: Compliance Monitoring at the DFFE.	Castle Wind Farm (Pty) Ltd	Pre-construction
Identify potential opportunities for local businesses.	Castle Wind Farm (Pty) Limited	Tender Design and Review stage
Develop a database of local BBBEEE service providers and ensure that they are informed of relevant tenders and job opportunities.	Castle Wind Farm (Pty) Limited	Pre-construction
This EMPr and the Environmental Authorisation (and amendments thereto) must be included in all tender documentation and Contractors contracts.	Castle Wind Farm (Pty) Limited	Tender process

**Performance**

» Design meets objectives and does not degrade the environment

<b>Indicator</b>	» Design and layouts respond to the mitigation measures and recommendations in the EIA report.
<b>Monitoring</b>	» Ensure that the design implemented meets the objectives and mitigation measures in the EIA report through review of the design by the Project Manager and Environmental Control Officer (ECO) prior to the commencement of construction.

## OBJECTIVE 2: To ensure effective communication mechanisms

On-going communication with affected and surrounding landowners is important to maintain during the construction and operational phases of the wind energy facility. Any issues and concerns raised should be addressed as far as possible in as short a timeframe as possible.

<b>Project component/s</b>	» Wind turbines » Access roads » Substation
<b>Potential Impact</b>	» Impacts on affected and surrounding landowners and land uses
<b>Activity/risk source</b>	» Activities associated with construction » Activities associated with operation
<b>Mitigation: Target/Objective</b>	» Effective communication with affected and surrounding landowners » Addressing of any issues and concerns raised as far as possible in as short a timeframe as possible

<b>Mitigation: Action/control</b>	<b>Responsibility</b>	<b>Timeframe</b>
Compile and implement a grievance mechanism procedure for the public (as outlined in <b>Appendix A</b> ) to be implemented during both the construction and operational phases of the facility. This procedure should include details of the contact person who will be receiving issues raised by interested and affected parties, and the process that will be followed to address issues.	Castle Wind Farm (Pty) Ltd	Pre-construction (construction procedure) Pre-operation (operation procedure)
Develop and implement a grievance mechanism for the construction, operational and closure phases of the project for all employees, contractors, subcontractors and site personnel. This procedure should be in line with the South African Labour Law.	Castle Wind Farm (Pty) Ltd	Pre-construction (construction procedure) Pre-operation (operation procedure)
Liaison with landowners is to be undertaken prior to the commencement of construction in order to agree on landowner-specific conditions during construction and maintenance.	Castle Wind Farm (Pty) Ltd	Pre-construction

<b>Performance Indicator</b>	» Effective communication procedures in place for all phases as required.
<b>Monitoring</b>	» An incident reporting system should be used to record non-conformances to the EMPr. Grievance mechanism procedures should be implemented.

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## CHAPTER 5: MANAGEMENT PLAN FOR WIND ENERGY FACILITY: CONSTRUCTION

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### 5.1. Overall Goal for Construction

The construction phase of the wind energy facility should be undertaken in such a way that ensures the construction activities are properly managed in respect of environmental aspects and impacts and enables the wind energy facility construction activities to be undertaken without significant disruption to other land uses in the area, in particular with regard to noise impacts, traffic and road use, and effects on local residents. The construction phase of the facility should also be undertaken in such a way as to minimise the impact on the vegetation, fauna and avifauna on the site as well as on any archaeological and historical value the site may have, as determined by the EIA.

### 5.2. Institutional Arrangements: Roles and Responsibilities for the Construction Phase of the Wind Energy Facility

As the Proponent, Castle Wind Farm (Pty) Limited must ensure that the implementation of the proposed project complies with the requirements of all environmental authorisations and permits, and obligations emanating from other relevant environmental legislation. This obligation is partly met through the development of the EMPr, and the implementation of the EMPr through its integration into the contract documentation. Castle Wind Farm (Pty) Limited will retain various key roles and responsibilities during the construction of the wind energy facility. These are outlined below.

Formal responsibilities are necessary to ensure that key procedures are executed. Specific responsibilities of the Project Manager; Site Manager; Safety, Health and Environmental Representative; Environmental Control Officer and Contractor for the construction phase of this project are as detailed below.

The **Project Manager** will:

- » Ensure of all specifications and legal constraints specifically with regards to the environment are highlighted to the Contractor(s) so that they are aware of these.
- » Ensure that Castle Wind Farm (Pty) Limited and its Contractor(s) are made aware of all stipulations within the EMPr.
- » Ensure that the EMPr is correctly implemented throughout the project by means of site inspections and meetings. This will be documented as part of the site meeting minutes.
- » Be fully conversant with the Environmental Impact Assessment for the project, the EMPr, the conditions of the Environmental Authorisation, and all relevant environmental legislation.

The **Site Manager** (Castle Wind Farm (Pty) Limited On-site Representative) will:

- » Be fully knowledgeable with the contents of the Environmental Impact Assessment.
- » Be fully knowledgeable with the contents and conditions of the Environmental Authorisation.
- » Be fully knowledgeable with the contents of the EMPr.



- » Be fully knowledgeable with the contents of all relevant environmental legislation and ensure compliance with these.
- » Have overall responsibility of the EMPr and its implementation.
- » Conduct audits to ensure compliance to the EMPr.
- » Ensure there is communication with the Project Manager, the Environmental Control Officer and relevant discipline Engineers on matters concerning the environment.
- » Ensure that no actions are taken which will harm or may indirectly cause harm to the environment and take steps to prevent pollution on the site.
- » Confine activities to the demarcated construction site.

The **Safety, Health and Environmental Representative** (ER) will:

- » Develop and compile environmental policies and procedures.
- » Direct and liaise with the Environmental Control Officer (ECO) regarding monitoring and reporting on the environmental performance of the construction phase.
- » Conduct internal environmental audits and co-ordinate external environmental audits.
- » Liaise with statutory bodies on environmental performance and other issues as required.

An independent **Environmental Control Officer (ECO)** must be appointed by the project proponent prior to the commencement of any authorised activities and will be responsible for monitoring, reviewing and verifying compliance by the EPC Contractor with the environmental specifications of the EMPr and the conditions of the Environmental Authorisation. Accordingly, the ECO will:

- » Be fully knowledgeable with the contents with the Environmental Impact Assessment.
- » Be fully knowledgeable with the contents with the conditions of the Environmental Authorisation.
- » Be fully knowledgeable with the contents with the EMPr.
- » Be fully knowledgeable of all the licences and permits issued to the site.
- » Be fully knowledgeable with the contents with all relevant environmental legislation and ensure compliance with them.
- » Ensure that the contents of this EMPr are communicated to the Contractor site staff and that the Site Manager and Contractor are constantly made aware of the contents through discussion.
- » Ensure that the compliance of the EMPr is monitored through regular and comprehensive inspection of the site and surrounding areas.
- » Ensure that if the EMPr conditions or specifications are not followed then appropriate measures are undertaken to address any non-compliances (for example an ECO may cease construction or an activity to prevent a non-compliance from continuing).
- » Monitoring and verification must be implemented to ensure that environmental impacts are kept to a minimum, as far as possible.
- » Ensure that the Site Manager has input into the review and acceptance of construction methods and method statements.
- » Ensure that activities on site comply with all relevant environmental legislation.
- » Remedial action will be required by the responsible party in the event of contravention of the specifications of the EMPr.
- » Ensure that the compilation of progress reports for submission to the Project Manager, with input from the Site Manager, takes place on a regular basis, including a final post-construction audit.
- » Ensure that there is communication with the Site Manager regarding the monitoring of the site.

- » Ensure that any non-compliance or remedial measures that need to be applied are reported.
- » Keep record of all activities on site, problems identified, transgressions noted and a schedule of tasks undertaken by the ECO in the form of a daily diary.
- » Independently report to DFFE in terms of compliance with the specifications of the EMPr and conditions of the Environmental Authorisation.
- » Submit independent reports to the DFFE and other regulating authorities regarding compliance with the requirements of the EMPr, EA and other environmental permits.

As a general mitigation strategy, the ECO should be present for the site preparation and initial clearing activities to ensure the correct demarcation of no-go areas, facilitate environmental induction with construction staff and supervise any flora relocation and faunal rescue activities that may need to take place during the site clearing (i.e. during site establishment, and excavation of foundations). Thereafter weekly site compliance inspections would probably be sufficient. However, in the absence of the ECO, there should be a designated environmental officer present to deal with any environmental issues that may arise such as fuel or oil spills. The ECO shall remain employed until all rehabilitation measures, as required for implementation due to construction damage, are completed and the site handed over for operation.

**Contractors and Service Providers:** The Contractor(s) is responsible for the overall execution of the activities envisioned in the construction phase including the implementation and compliance with recommendations and conditions of the EMPr. It is important that the Contractor(s) is fully aware of the responsibilities in terms of the relevant environmental legislation and the contents of this EMPr. The Contractor(s) is responsible for informing employees and sub-contractors of their environmental obligations in terms of the environmental specifications, and for ensuring that employees are adequately experienced and properly trained in order to execute the works in a manner that will minimise environmental impacts. The Contractor(s)'s obligations in this regard include the following:

- » Ensure implementation and compliance with the EMPr at all times during construction activities.
- » Responsible for the implementation of corrective actions enforced by the ECO/ EO for non-conformances recorded within a reasonable period of time. The Method Statement / Corrective Action Plan must indicate the turn-around time for closing out the non-conformances.
- » Ensuring that a report is tabled at each site meeting, which will document all incidents that have occurred during the period before the site meeting.
- » Employees must be provided with a basic understanding of the key environmental features of the construction site and the surrounding environment by the Contractor's Environmental Officer.
- » A copy of the EMPr must be easily accessible to all on-site staff members.
- » Employees must be familiar with the requirements of this EMPr and the environmental specifications as they apply to the construction of the proposed facility.
- » Prior to commencing any site works, all employees and sub-contractors must have attended an environmental awareness training course which must provide staff with an appreciation of the project's environmental requirements, and how they are to be implemented. The training is to be conducted by the Environmental Officer.
- » Staff will be informed of environmental issues as deemed necessary by the ECO / EO.

»

**Contractor's Safety, Health and Environment Representative:** The Contractor's Safety, Health and Environment (SHE) Representative, employed by the Contractor, must be a suitably qualified individual appointed to be responsible for managing the day-to-day on-site implementation of this EMPr, and for the compilation of regular (usually weekly) Monitoring Reports. In addition, the SHE must act as liaison and advisor on all environmental and related issues and ensure that any complaints received from the public are duly recorded and forwarded to the Site Manager and Contractor.

The Contractor's Safety, Health and Environment Representative should:

- » Be well versed in environmental matters.
- » Understand the relevant environmental legislation and processes.
- » Understand the hierarchy of Environmental Compliance Reporting, and the implications of Non-Compliance.
- » Know the background of the project and understand the implementation programme.
- » Be able to resolve conflicts and make recommendations on site in terms of the requirements of this Specification.
- » Keep accurate and detailed records of all EMPr-related activities on site.

Proponent's EO / Contractor's EO and/or Environment Representative: The EO will be responsible for implementation of this EMPr and should be appointed prior to any commencement of the activities.

The Proponent's EO / Contractor's EO / Environmental Representative should:

- » Be well versed with all the project documentation and general environmental matters.
- » Understand the relevant environmental legislation and processes and the implementation thereof.
- » Understand the hierarchy of Environmental Compliance Reporting, and the implications of Non-Compliance.
- » Know the background of the project and understand the implementation programme.
- » Be able to resolve conflicts and make recommendations on site in terms of the requirements of this Specification.
- » Keep accurate and detailed records of all EMPr-related activities on site. The EO shall keep a daily diary for monitoring the site specific activities as per project schedule.
- » As a general mitigation strategy, the EO should supervise any flora relocation and faunal rescue activities that may need to take place during the site clearing (i.e. during site establishment, and excavation of foundations) and therefore needs the relevant training/ experience. The EO will have overall responsibility for environmental management and implementation of mitigations in absence of the ECO.
- » The EO is responsible for managing the day-to-day on-site implementation of this EMPr and other Project Permits/Authorisations.
- » Ensure or otherwise train and induct all contractor's employees prior to commencement of any works.
- » Compilation of Weekly Monitoring Reports to be submitted to the ECO and Site Manager.

- » In addition, the EO / Environmental Representative must act as project liaison and advisor on all environmental and related issues and ensure that any complaints received from the public are duly recorded and forwarded to the Site Manager, ECO and Contractor(s).

### 5.3. Objectives

In order to meet the goal outlined in Section 5.1, the following objectives have been identified, together with necessary actions and monitoring requirements.

#### OBJECTIVE 1: Securing the site and site establishment

The Contractor must take all reasonable measures to ensure the safety of the public in the surrounding area. Where the public could be exposed to danger by any of the works or site activities, the Contractor must, as appropriate, provide suitable flagmen, barriers and/or warning signs in English and any other relevant indigenous languages, all to the approval of the Site Manager. All unattended open excavations shall be adequately demarcated and/or fenced (fencing shall consist of a minimum of three strands of wire wrapped with danger tape). Adequate protective measures must be implemented to prevent unauthorised access to the working area and the internal access/haul routes.

<b>Project component/s</b>	<ul style="list-style-type: none"> <li>» Wind turbines</li> <li>» Cabling between turbines</li> <li>» Substation</li> <li>» Access roads</li> <li>» Buildings</li> <li>» Operation and maintenance buildings</li> <li>» Laydown areas and hardstands</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Hazards to landowners/public</li> <li>» Security of materials</li> <li>» Substantially increased damage to natural vegetation and sensitive environmental areas, due largely to unawareness of where such areas are located.</li> <li>» Potential impact on fauna and avifauna</li> </ul>
<b>Activities/risk sources</b>	<ul style="list-style-type: none"> <li>» Open excavations (foundations and cable trenches)</li> <li>» Movement of construction vehicles in the area and on-site</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» To secure the site against unauthorised entry</li> <li>» To protect members of the public/landowners/residents</li> </ul>

<b>Mitigation: Action/control</b>	<b>Responsibility</b>	<b>Timeframe</b>
Secure site, working areas and excavations in an appropriate manner, as agreed with the ECO.	Contractor	During site establishment Maintenance: for duration of Contract

Mitigation: Action/control	Responsibility	Timeframe
Where necessary to control access, fence and secure area and implement access control procedures.	Contractor	During site establishment Maintenance: for duration of Contract
Where necessary to control access, fence and secure area using appropriate means, and implement access control procedures – fencing should take cognisance of farming activities, e.g. not limiting game and/or sheep and other animals from accessing water/ food (fencing should be discussed and planned in conjunction with the landowners prior to construction).	Contractor	During site establishment Maintenance: for duration of Contract
Fence and secure Contractor's equipment camp.	Contractor	Erection: during site establishment Maintenance: for duration of Contract
All unattended open excavations must be adequately demarcated and/or fenced (fencing shall consist of a minimum of three strands of wire wrapped with danger tape).	Contractor	Erection: during site establishment Maintenance: for duration of Contract
Location of concrete batching plant/s to be located in areas of low sensitivity within the approved development area.	Contractor	During site establishment
<u>High traffic areas and buildings such as offices, batching plants, storage areas etc. should where possible be situated in areas that are already disturbed and existing roads and farm tracks should be used where possible.</u>	<u>Contractor(s)</u>	<u>During site establishment</u> <u>Implement for duration of contract</u>
<u>The minimum footprint areas of infrastructure should be used wherever possible, including road widths and lengths</u>	<u>Contractor(s)</u>	<u>During site establishment</u> <u>Implement for duration of contract</u>
<u>Establish the necessary ablution facilities with chemical toilets and provide adequate sanitation facilities and ablutions for construction workers (1 toilet per every 15 workers) at appropriate locations on site.</u>	<u>Contractor(s)</u>	<u>During site establishment and during construction</u>
<u>Ablution or sanitation facilities should not be located within 100 m from a 1:100 year flood line or within 32m of a watercourse if the 1:100 year flood line is unknown/uncertain.</u>	<u>Contractor(s)</u>	<u>Site establishment, and duration of construction</u>

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» Site is secure and there is no unauthorised entry</li> <li>» No members of the public/ landowners injured</li> </ul>
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>» Regular visual inspection of fence for signs of deterioration/forced access</li> <li>» An incident reporting system must be used to record non-conformances to the EMPr.</li> <li>» Public complaints register must be developed and maintained on site.</li> <li>» ECO to monitor all construction areas on a continuous basis until all construction is completed; immediate report backs to site manager.</li> </ul>

- » ECO to address any infringements with responsible contractors as soon as these are recorded.

## OBJECTIVE 2: Maximise local employment and business opportunities associated with the construction phase

It is acknowledged that skilled personnel are required for the construction of the wind turbines and associated infrastructure. However, where semi-skilled and unskilled labour is required, opportunities for local employment should be maximised as far as possible.

<b>Project component/s</b>	» Construction activities associated with the establishment of the wind energy facility, including associated infrastructure.
<b>Potential Impact</b>	» The opportunities and benefits associated with the creation of local employment and business should be maximised. However, due to the relatively small size of the facility the number of employment and business opportunities for locals will be limited.
<b>Activities/risk sources</b>	» The employment of outside contractors to undertake the work and who make use of their own labour will reduce the employment and business opportunities for locals. Employment of local labour will maximise local employment opportunities.
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» The appointed contractor should appoint local contractors and implement a 'locals first' policy, especially for semi and low-skilled job categories.</li> <li>» Castle Wind Farm (Pty) Limited should develop a database of local BEE service providers.</li> </ul>

<b>Mitigation: Action/control</b>	<b>Responsibility</b>	<b>Timeframe</b>
Employ as many workers (skilled, semi-skilled / low-skilled) from the local area/ nearby towns.	Contractor(s)	Construction
Where required, implement appropriate training and skills development programmes prior to the initiation of the construction phase to ensure that local employment target is met.	Contractor(s)	Pre-construction
<u>Develop a database of local Broad Based Black Economic Empowerment (BBBEE) service providers and ensure that they are informed of relevant tenders and job opportunities.</u>	<u>Contractor(s)</u>	<u>Project duration</u>

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» Source as many local labourers as possible.</li> <li>» Database of potential local BBBEE services providers in place before construction phase commences.</li> <li>» <u>Skills audit to determine need for training and skills development programme undertaken within 1 month of commencement of construction phase.</u></li> </ul>
<b>Monitoring and Reporting</b>	<ul style="list-style-type: none"> <li>» Castle Wind Farm (Pty) Limited and appointed ECO must monitor indicators listed above to ensure that they have been met for the construction phase.</li> <li>» An incident reporting system must be used to record non-conformances to the EMP.</li> </ul>

- » Public complaints register must be developed and maintained on site.
- » A Site Specific Grievance Mechanism must be communicated and implemented prior to construction.

### **OBJECTIVE 3: Avoid the negative social impacts on family structures and social networks due to the presence of construction workers**

While the presence of construction workers does not in itself constitute a social impact, the manner in which construction workers conduct themselves can impact on the local community. In this regard the most significant negative impact is associated with the disruption of existing family structures and social networks. This risk is linked to the potential behaviour of male construction workers, including an increase in alcohol and drug use, an increase in crime levels, the loss of girlfriends and or wives to construction workers, an increase in teenage and unwanted pregnancies, an increase in prostitution and an increase in sexually transmitted diseases.

The potential risk to local family structures and social networks is, however, likely to be low. The low and semi-skilled workers are likely to be local residents and will therefore form part of the local family and social network.

<b>Project component/s</b>	» Construction and establishment activities associated with the establishment of the wind energy facility, including associated infrastructure.
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» The presence of construction workers who live outside the area and who are housed in local towns can impact on family structures and social networks.</li> <li>» Presence of construction workers on site may result in loss of livestock due to stock theft and damage to farm infrastructure, such as gates and fences. Poaching of wild animals may also occur.</li> <li>» Due to the relatively small number of workers associated with the construction of the proposed facility, the risk of impacts is likely to be low.</li> </ul>
<b>Activities/risk sources</b>	<ul style="list-style-type: none"> <li>» The presence of construction workers can impact negatively on family structures and social networks, especially in small, rural communities.</li> <li>» The presence of construction workers on the site can result in stock thefts and damage to farm infrastructure.</li> </ul>
<b>Mitigation: Target/Objective</b>	» Avoid and or minimise the potential impact of construction workers on the local community and livelihoods.

<b>Mitigation: Action/control</b>	<b>Responsibility</b>	<b>Timeframe</b>
Employ as many workers (skilled, semi-skilled / low-skilled) from the local area as possible. This should be included in the tender documents. Construction workers should be recruited from the local area in and around the towns such as De Aar	Contractor	Identify suitable local contractors prior to the tender process for the construction phase.
Establish contact with the adjacent farmers and develop	Castle      Wind	Briefing session for construction

Mitigation: Action/control	Responsibility	Timeframe
<p>a Code of Conduct for construction workers.</p> <p>Ensure that construction workers attend a brief session before they commence activities. The aim of the briefing session is to inform them of the rules and regulations governing activities on the site as set out in the Code of Conduct.</p> <p>Ensure that all workers are informed at the outset of the construction phase of the conditions contained on the Code of Conduct.</p>	<p>Farm (Pty) Limited Contractor</p>	<p>workers held before they commence work on site.</p>
<p>Ensure that construction workers who are found guilty of breaching the Code of Conduct are dealt with appropriately. Dismissals must be in accordance with South African labour legislation.</p>	<p>Castle Wind Farm (Pty) Limited and contractors</p>	<p>Construction</p>
<p>No housing of construction workers on the site to be permitted, apart from security personnel.</p>	<p>Contractors</p>	<p>Construction</p>
<p>Implement a policy that no employment will be available at the gate.</p>	<p>Contractors</p>	<p>Construction</p>
<p>Compensate farmers / community members for cost for any losses, such as livestock, damage to infrastructure etc proven to be associated with the project.</p>	<p>Contractors</p>	<p>Construction</p>

<p><b>Performance Indicator</b></p>	<ul style="list-style-type: none"> <li>» Employment policy and tender documents that set out requirement for local employment and targets completed before construction phase commences.</li> <li>» Code of Conduct developed and approved prior to commencement of construction phase.</li> <li>» Labour locally sourced, where possible.</li> <li>» Tender documents for contractors include recommendations for construction camp.</li> <li>» All construction workers made aware of Code of Conduct within first week of being employed.</li> <li>» Briefing session with construction workers held at outset of construction phase.</li> </ul>
<p><b>Monitoring and Reporting</b></p>	<ul style="list-style-type: none"> <li>» Castle Wind Farm (Pty) Limited and appointed ECO must monitor indicators listed above to ensure that they have been met for the construction phase.</li> <li>» An incident reporting system must be used to record non-conformances to the EMP.</li> <li>» Public complaints register must be developed and maintained on site.</li> </ul>

## OBJECTIVE 4: Noise control

Various construction activities would be taking place during the development of the facility and may pose a noise risk to sensitive receptors. While the study undertaken in the EIA investigated likely and significant noisy activities, it did not evaluate all potential activities that could result in a noise impact, as these were not defined at the time of the study. Other construction activities not evaluated could include temporary



or short-term activities where small equipment is used (such as the digging of trenches to lay underground power-cables).

<b>Project component/s</b>	<ul style="list-style-type: none"> <li>» Construction of turbine (foundation, tower, nacelle and rotor)</li> <li>» Substation</li> <li>» access roads</li> <li>» <u>Associated infrastructure</u></li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Nuisance noise from construction activities affecting the surrounding community</li> </ul>
<b>Activity/risk source</b>	<ul style="list-style-type: none"> <li>» Any construction activities taking place within 500 m from potentially sensitive receptors (PSR)</li> <li>» <u>Site preparation and earthworks</u></li> <li>» <u>Construction-related transport</u></li> <li>» <u>Foundations or plant equipment installation</u></li> <li>» <u>Building activities</u></li> <li>» <u>Power line construction activities</u></li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» Ensure equivalent A-weighted noise levels below 45 dBA at potentially sensitive receptors.</li> <li>» Ensure that maximum noise levels at potentially sensitive receptors be less than 65 dBA.</li> <li>» Prevent the generation of a disturbing or nuisance noises</li> <li>» Ensure acceptable noise levels at surrounding stakeholders and potentially sensitive receptors.</li> <li>» Ensuring compliance with the Noise Control Regulations</li> </ul>

<b>Mitigation: Action/control</b>	<b>Responsibility</b>	<b>Timeframe</b>
Where possible, construction work should be undertaken during normal working hours (06H00 – 18H00), from Monday to Friday. If work is required on the weekend / public holiday, agreements can be reached (in writing) with the landowners adjacent to the work, these working hours can be extended.	Contractor	Construction
The construction crew must abide by the national standards and local by-laws regarding noise.	Contractor	Construction
All construction equipment, including vehicles, must be properly and appropriately maintained in order to minimise noise generation.	Contractor	Construction
Establish a line of communication and notify all stakeholders and sensitive receptors of the means of registering any issues, complaints or comments.	Contractor	All phases of project
Notify potentially sensitive receptors (PSR) about work to take place at least 2 days before the activity in the vicinity (within 500 m) of the PSR is to start. The following information to be presented in writing: <ul style="list-style-type: none"> <li>» Description of activity to take place</li> <li>» Estimated duration of activity</li> <li>» Working hours</li> <li>» Contact details of responsible party</li> </ul>	Contractor	At least 2 days, but not more than 5 days before activity is to commence
<u>Noise from the turbines at the identified noise sensitive areas</u>	<u>Contractor</u>	<u>Construction</u>

Mitigation: Action/control	Responsibility	Timeframe
<u>must be less than the 45dB(A) limit for rural areas presented in SANS10103.</u>		
<u>The applicant must ensure that the National Noise Control Regulations and SANS10103:2008 are adhered to and reasonable measures to limit noise from the work site are implemented.</u>	<u>Contractor</u>	<u>Construction</u>
<u>The applicant must ensure that the construction staff working in areas where the 8-hour ambient noise levels exceed 75Dba must wear ear protection equipment.</u>	<u>Contractor</u>	<u>Construction</u>

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» No complaints received concerning noise.</li> <li>» Equivalent A-weighted noise levels below 45 dBA at potentially sensitive receptors.</li> <li>» Maximum noise levels at potentially sensitive receptors are less than 65 dBA.</li> </ul>
<b>Monitoring and Reporting</b>	<ul style="list-style-type: none"> <li>» Should a complaint about noise be reported, Castle Wind Farm (Pty) Limited to look into the matter and determine steps to deal with the complaint. An incident reporting system must be used to record non-conformances to the EMP.</li> <li>» Public complaints register must be developed and maintained on site.</li> </ul>

## OBJECTIVE 5: Management of dust and emissions and damage to roads

During the construction phase, limited gaseous or particulate emissions (and dust) are anticipated from exhaust emissions from construction vehicles and equipment on-site, as well as vehicle entrained dust from the movement of vehicles on the internal access roads.

<b>Project component/s</b>	<ul style="list-style-type: none"> <li>» wind turbines</li> <li>» access roads</li> <li>» substation</li> </ul>
<b>Potential Impact</b>	» Heavy vehicles can generate noise and dust impacts. Movement of heavy vehicles can also damage roads.
<b>Activities/risk sources</b>	» The movement of heavy vehicles and their activities on the site can result in noise and dust impacts and damage roads.
<b>Mitigation: Target/Objective</b>	» To avoid and or minimise the potential noise and dust impacts associated with heavy vehicles, and also minimise damage to roads.

Mitigation: Action/control	Responsibility	Timeframe
Implement appropriate dust suppression measures on site such as wetting roads on a regular basis.	Contractor	Construction
Haul vehicles moving outside the construction site carrying material that can be wind-blown should be covered with tarpaulins.	Contractor	Duration of contract
Ensure vehicles adhere to speed limits on public roads and	Contractor/	Duration of contract

Mitigation: Action/control	Responsibility	Timeframe
speed limits set within the site by the Site Manager. Vehicles should be fitted with recorders to record when vehicles exceed the speed limit.	transportation contractor	
Disturbed areas must be re-vegetated as soon as practicable after construction is complete in an area.	Contractor	At completion of the construction phase
Vehicles and equipment must be maintained in a road-worthy condition at all times.	Contractor	Prior to construction phase
Ensure that damage to gravel public roads and access roads attributable to construction vehicles is repaired before completion of construction phase.	Contractor	Before completion of construction phase
Regular dust control of materials (sand, soil, cement) must be used at concrete batching plants on site	Contractor	Construction
<u>Foundations and trenches must be backfilled with originally excavated materials as much as possible. Excess excavation materials must be disposed of only in approved areas or, if suitable, stockpiled for use in reclamation activities!</u>	<u>Contractor</u>	<u>Construction</u>
<u>Borrow pit materials must be obtained only from authorized and permitted sites.</u>	<u>Contractor</u>	<u>Construction</u>
<u>Anti-erosion measures such as silt fences must be installed in disturbed areas.</u>	<u>Contractor</u>	<u>Construction</u>

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» Appropriate dust suppression measures implemented on site during the construction phase.</li> <li>» Drivers made aware of the potential safety issues and enforcement of strict speed limits when they are employed.</li> <li>» All heavy vehicles equipped with speed monitors before they are used in the construction phase.</li> <li>» Road worthy certificates in place for all heavy vehicles at outset of construction phase and up-dated on a monthly basis.</li> </ul>
<b>Monitoring and Reporting</b>	<ul style="list-style-type: none"> <li>» Castle Wind Farm (Pty) Limited and appointed ECO must monitor indicators listed above to ensure that they have been met for the construction phase.</li> <li>» Immediate reporting by personnel of any potential or actual issues with nuisance dust or emissions to the Site Manager.</li> <li>» An incident reporting system must be used to record non-conformances to the EMP.</li> <li>» Public complaints register must be developed and maintained on site.</li> </ul>

## OBJECTIVE 6: Soil and rock degradation and erosion control

The natural soil on the site needs to be preserved as far as possible to minimise impacts on the environment. Soil degradation including erosion (by wind and water) and subsequent deposition

elsewhere is of a concern in areas underlain by fine grained soil which can be mobilised when disturbed, even on relatively low slope gradients (accelerated erosion). Uncontrolled run-off relating to construction activity (excessive wetting, etc.) will also lead to accelerated erosion. Degradation of the natural soil profile due to excavation, stockpiling, compaction, pollution and other construction activities will affect soil forming processes and associated ecosystems. Steep slopes are prone to soil erosion and good soil management must be undertaken during construction.

A set of strictly adhered to mitigation measures are required to be implemented in order to effectively limit the impact on the environment. The disturbance areas where human impact is likely are the focus of the mitigation measures laid out below.

<b>Project component/s</b>	<ul style="list-style-type: none"> <li>» wind turbines</li> <li>» access roads</li> <li>» substation</li> <li>» Sealed surfaces (e.g. roofs, concrete surfaces, compacted road surfaces, paved roads / areas).</li> <li>» All other infrastructure</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Erosion and soil loss</li> <li>» Negative impacts on wetlands</li> <li>» Disturbance to or loss of wetland/pan habitat</li> <li>» Sedimentation of watercourses/wetland areas</li> <li>» A loss of indigenous vegetation cover</li> <li>» Increased runoff into drainage lines can potentially be associated with accelerated erosion</li> </ul>
<b>Activities/risk sources</b>	<ul style="list-style-type: none"> <li>» Rainfall and wind erosion of disturbed areas</li> <li>» Excavation, stockpiling and compaction of soil</li> <li>» Concentrated discharge of water from construction activity</li> <li>» Stormwater run-off from sealed surfaces</li> <li>» Mobile construction equipment movement on site</li> <li>» River/stream/drainage line road crossings</li> <li>» Roadside drainage ditches</li> <li>» Project related infrastructure, such as buildings, turbines and fences</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» To minimise erosion of soil from site during construction</li> <li>» To minimise deposition of soil into drainage lines</li> <li>» To minimise damage to vegetation by erosion or deposition</li> <li>» To minimise damage to rock, soil and vegetation by construction activity</li> <li>» No accelerated overland flow related surface erosion as a result of a loss of vegetation cover</li> <li>» No reduction in the surface area of wetlands (drainage lines and other wetland areas) as a result of the establishment of infrastructure</li> <li>» Minimal loss of vegetation cover due to construction related activities</li> <li>» No or insignificant loss of wetland area in the specialist study area</li> <li>» No increase in runoff into drainage lines as a result of construction of project related infrastructure</li> <li>» No increase in runoff into drainage lines as a result of road construction</li> </ul>

Mitigation: Action/control	Responsibility	Timeframe
Stockpile topsoil for re-use in rehabilitation phase. Maintain stockpile shape and protect from erosion. All stockpiles must be positioned at least 50 m away from drainage lines and wetlands. Limit the height of stockpiles as far as possible to reduce compaction.	Contractor	During site establishment and any activity related to earthworks as well as the duration of construction
New access roads to be carefully planned and constructed to minimise the impacted area and prevent unnecessary excavation, placement and compaction of soil.	Engineer / Contractor	Before and during construction
Identify and demarcate construction areas for general construction work and restrict construction activity to these areas.	Contractor	Construction
Rehabilitate disturbance areas as soon as construction in an area is completed.	Contractor	During and after construction
Stockpiles not used in three (3) months after stripping must be seeded or appropriately covered to prevent dust and erosion - only if natural seeding does not occur.	Contractor	During and after construction
Erosion control measures: Implement run-off attenuation on slopes (sandbags, logs), silt fences, stormwater catch-pits, shade nets or temporary mulching over denuded areas.	Contractor	Erection: Before construction Maintenance: Duration of contract
<u>Dust abatement techniques must be used before and during surface clearance, excavation, or blasting activities</u>	<u>Contractor</u>	<u>Construction</u>
<u>Appropriate dust suppression techniques must be implemented on all exposed surfaces during periods of high wind. Such measures may include wet suppression, chemical stabilisation, the use of wind fence, covering surfaces with straw chippings and re-vegetation of open areas.</u>	<u>Contractor</u>	<u>Construction</u>
Particular care should be taken in the design of road drainage line and wetland crossings in order to ensure there is no step in the channel bed, substrate continuity is maintained and no undue constriction of flow takes place.	Contractor	Erection: during site establishment Maintenance: for duration of contract
Where access roads cross natural drainage lines or wetlands, culverts (or other appropriate measures) must be designed to allow free flow. Regular maintenance of the culverts must be carried out.	Engineer / Contractor	Before and during construction
Control depth of all excavations and stability of cut faces/sidewalls.	Engineer / Contractor	Maintenance over duration of contract
Compile a comprehensive stormwater management plan as part of the final design of the project and implement during construction and operation.	Contractor	Compile during design; implement during construction & operation
Cement batching to take place in designated areas only, as approved on site layout (if applicable).	Contractor	Construction

Mitigation: Action/control	Responsibility	Timeframe
Spillages of cement to be cleaned up immediately and disposed or re-used in the construction process.	Contractor	Construction
Spill kits to be kept on active parts of the construction site & at site offices.	Contractor	Construction
Soil erosion control measures (such as hessian mats and gabions) be used for in erosion prone areas such as steep slopes.	Contractor	Construction

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» No activity outside of designated areas</li> <li>» Minimal level of soil erosion around site as a result of construction activities</li> <li>» Minimal level of increased siltation in drainage lines as a result of construction activities</li> <li>» Minimal level of soil degradation as a result of construction activities</li> </ul>
<b>Monitoring and Reporting</b>	<ul style="list-style-type: none"> <li>» Continual inspections of the site by ECO</li> <li>» Fortnightly inspections of sediment control devices by ECO</li> <li>» On-going inspections of surroundings, including drainage lines and wetlands by ECO</li> <li>» Reporting of ineffective sediment control systems and rectification as soon as possible.</li> <li>» An incident reporting system must record non-conformances to the EMP.</li> <li>» Public complaints register must be developed and maintained on site.</li> </ul>

## OBJECTIVE 7: Limit disturbance and avoid damage to wetland areas and drainage lines

The layout for the wind energy facility avoids the placement of turbines (such as the substation) within wetland areas. However, there are still some instances where roads and cables cross identified wetland areas. Mitigation measures are required to minimise impacts on those systems affected in this regard.

<b>Project component/s</b>	<ul style="list-style-type: none"> <li>» access roads</li> <li>» cabling</li> </ul>
<b>Potential Impact</b>	» Damage to wetland areas by any means that will result in hydrological changes (includes erosion, siltation, dust, direct removal of soil or vegetation, dumping of material within wetlands). The focus should be on the functioning of the wetland as a natural system.
<b>Activity/risk source</b>	» Construction of access roads, cabling and power line
<b>Mitigation: Target/Objective</b>	» No damage to wetlands and drainage lines within project area

Mitigation: Action/control	Responsibility	Timeframe
Rehabilitate any disturbed areas as soon as possible once construction is completed in an area.	Contractor	Construction
Control stormwater and runoff water. Contaminated runoff from the construction site(s) should be prevented	Contractor	Construction

Mitigation: Action/control	Responsibility	Timeframe
from entering the rivers/streams.		
For any new construction where direct impacts on wetlands are unavoidable cross watercourses perpendicularly to minimise disturbance footprints.	Contractor	Construction
Construction must not result in the width of the watercourse being narrowed.	Contractor	Construction
Utilise erosion control measures on access roads, wetland areas and drainage lines where required.	Contractor	Construction
Ablution facilities at the construction sites must be located at least 100m away from the river system and regularly serviced	Contractor	Construction
Concrete batching plants and stockpiles to be located more than 500m away from wetlands.	Contractor	Construction

<b>Performance Indicator</b>	» No impacts on water quality, water quantity, wetland vegetation, natural status of wetland
<b>Monitoring and Reporting</b>	<ul style="list-style-type: none"> <li>» Habitat loss in watercourses should be monitored before and after construction.</li> <li>» An incident reporting system must be used to record non-conformances to the EMPr.</li> <li>» Public complaints register must be developed and maintained on site.</li> </ul>

### OBJECTIVE 8: Limit disturbance of vegetation and loss of protected flora during construction

Impacts on vegetation at the construction stage are expected to be mainly as a result of direct permanent loss of vegetation in development footprint areas. Due to disturbance of vegetation, there is a higher risk of alien species dominating disturbed areas. Therefore, control of alien invasive plants is required.

<b>Project component/s</b>	All infrastructure and activities which result in vegetation loss or clearing including: <ul style="list-style-type: none"> <li>» Clearing for roads and excavation for turbine foundations</li> <li>» Underground cabling</li> <li>» Access roads</li> </ul>
<b>Potential Impact</b>	» Loss of plant cover leading to erosion as well as loss of faunal habitat and loss of specimens of protected plants
<b>Activity/risk source</b>	Vegetation clearing for the following: <ul style="list-style-type: none"> <li>» Turbine construction and service areas</li> <li>» Access roads</li> <li>» Laydown areas</li> <li>» Construction Camps</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» To reduce the footprint and low impact on terrestrial environment</li> <li>» To reduce the impact on protected plant species</li> </ul>

Mitigation: Action/control	Responsibility	Timeframe
Affected individuals of protected species which cannot be avoided should be translocated to a safe area on the site prior to construction. This does not include trees which cannot be translocated, which should be trimmed to a height of 0.5m rather than removed completely.	Specialist	Construction
Revegetation of cleared areas or monitoring should be implemented to ensure that recovery is taking place	Contractor	Construction
A site rehabilitation programme should be compiled and implemented.	Contractor in consultation with Specialist	Duration of contract
Avoid creating conditions in which alien plants may become established: <ul style="list-style-type: none"> <li>» Keep disturbance of indigenous vegetation to a minimum</li> <li>» Rehabilitate disturbed areas as quickly as possible once construction is complete in an area</li> <li>» Do not import soil from areas with alien plants</li> </ul>	Contractor	Construction & Operation
Establish an on-going monitoring programme to detect, quantify and remove any alien species that may become established and identify the problem species (as per Conservation of Agricultural Resources Act, Act 43 of 1983 and NEM: Biodiversity Act)	Contractor	Construction & Operation
Immediately control any alien plants that become established using registered control methods. <u>Cleared alien vegetation must not be dumped on adjacent intact vegetation during clearance but should be temporarily stored in a demarcated area.</u>	Contractor	Construction & Operation

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» Vegetation loss must be restricted to infrastructure footprint</li> <li>» Low impact on protected plant species</li> <li>» A permit must be obtained for the destruction or translocate affected individuals of protected species.</li> </ul>
<b>Monitoring and Reporting</b>	<p>ECO to monitor construction to ensure that:</p> <ul style="list-style-type: none"> <li>» Vegetation is cleared only within essential areas</li> <li>» Erosion risk is maintained at an acceptable level through flow regulation structures where appropriate and the maintenance of plant cover wherever possible</li> </ul>

## OBJECTIVE 9: Protection of fauna & avifauna

Infrastructure associated with the facility often impacts on birds and animals. New roads constructed will also have a disturbance and habitat destruction impact.



<b>Project component/s</b>	<ul style="list-style-type: none"> <li>» wind turbines and associated laydown areas</li> <li>» access roads and cabling</li> <li>» substation</li> <li>» workshop area</li> <li>» batching plants</li> <li>» temporary laydown areas</li> <li>» associated access road</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Vegetation clearance and associated impacts on faunal habitats</li> <li>» Disturbance of birds</li> </ul>
<b>Activity/risk source</b>	<ul style="list-style-type: none"> <li>» Site preparation and earthworks</li> <li>» Construction-related traffic</li> <li>» Foundations or plant equipment installation</li> <li>» Mobile construction equipment</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» To minimise footprints of habitat destruction</li> <li>» To minimise disturbance to resident and visitor faunal and avifaunal species</li> <li>» To minimise disturbance to Verreux's eagles' nests in close proximity to the site</li> </ul>

<b>Mitigation: Action/control</b>	<b>Responsibility</b>	<b>Timeframe</b>
Clearly mark areas to be cleared in order to eliminate unnecessary clearing/disturbance.	Contractor in consultation with Specialist	Pre-construction
The extent of clearing and disturbance to the native vegetation must be kept to a minimum so that impact on fauna and their habitats is restricted.	Contractor	Site establishment & duration of contract
A site rehabilitation programme should be compiled and implemented.	Contractor in consultation with Specialist	Duration of contract
<u>All construction and maintenance motor vehicle operators should undergo an environmental induction that includes instruction on the need to comply with speed limits, to respect all forms of wildlife. Speed limits must be enforced to ensure that road killing, dust and erosion is limited. The speed limits should be restricted to maximum 30 km/h.</u>	<u>Contractor and Operation Manager</u>	<u>Construction and operation</u>
<u>No trapping, killing or poisoning of any wildlife is to be allowed.</u>	<u>Contractor</u>	<u>Duration of contract</u>
<u>Reports regarding bird monitoring must be submitted to the relevant provincial environmental department, Birdlife South Africa, the Endangered Wildlife Trust (EWT), and the DFFE on a quarterly basis</u>	<u>Contractor in consultation with Specialist</u>	<u>Duration of contract</u>
<u>The baseline data collected and documented during the survey must be shared with the EWT, and Birdlife South Africa for a better understanding of the distribution or breeding behaviour of any of the priority species.</u>	<u>Contractor in consultation with Specialist</u>	<u>Duration of contract</u>

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» Minimum disturbance outside of designated work areas</li> <li>» Minimised clearing of existing/natural vegetation and habitats for fauna and avifauna</li> <li>» Limited impacts on faunal species (i.e. noted/recorded fatalities), especially those of conservation concern.</li> </ul>
<b>Monitoring and Reporting</b>	<ul style="list-style-type: none"> <li>» Observation of vegetation clearing activities by ECO throughout construction phase</li> <li>» Supervision of all clearing and earthworks by ECO</li> <li>» An incident reporting system must be used to record non-conformances to the EMP.</li> <li>» Public complaints register must be developed and maintained on site.</li> </ul>

## OBJECTIVE 10: Protection of fossils and sites of heritage and archaeological value

The construction phase of the wind energy facility will entail excavations into the superficial sediment cover (soils etc.) and perhaps also into the underlying bedrock. Areas of potentially fossiliferous bedrock may be sealed-in or sterilised by infrastructure such as hard standing areas for each wind turbine, lay down areas and internal access roads. These activities may adversely affect potential fossil heritage within the study area by damaging, destroying, disturbing or permanently sealing-in fossils that are then no longer available for scientific research or other public good.

The main cause of impacts to archaeological sites is physical disturbance of the material itself and its context. The heritage and scientific potential of an archaeological site is highly dependent on its geological and spatial context. This means that even though, for example, a deep excavation may expose archaeological artefacts, the artefacts are relatively meaningless once removed from the area in which they were found. Large-scale excavations for foundations will damage archaeological sites, as will road construction activities.

<b>Project component/s</b>	<ul style="list-style-type: none"> <li>» wind turbines</li> <li>» access roads and cabling</li> <li>» Operations and service building area</li> <li>» substation</li> <li>» associated access roads</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Heritage objects or artefacts found on site are inappropriately managed or destroyed</li> <li>» Loss of fossil resources</li> </ul>
<b>Activity/risk source</b>	<ul style="list-style-type: none"> <li>» Site preparation and earthworks</li> <li>» Foundations or plant equipment installation</li> <li>» Mobile construction equipment movement on site</li> <li>» Access road construction activities</li> <li>» Substation construction facilities</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» To ensure that any heritage objects found on site are treated appropriately and in accordance with the relevant legislation</li> </ul>

Mitigation: Action/control	Responsibility	Timeframe
Construction managers/foremen should be informed	Specialist	Pre-construction

Mitigation: Action/control	Responsibility	Timeframe
before construction starts on the possible types of heritage sites and cultural material they may encounter and the procedures to follow when they find sites.	EO	
If a heritage object is found, work in that area must be stopped immediately, and appropriate specialists brought in to assess to site, notify the administering authority of the item/site, and undertake due/required processes.	Contractor in consultation with Specialist	Duration of contract
Should any fossil materials be identified during the construction phase a palaeontologist should be appointed to evaluate its significance.	Contractor in consultation with Specialist	Construction
Deeper excavations such as those associated with the foundations for the wind turbines must be regularly inspected by a palaeontologist during their excavation.	Specialist	Construction
If at any stage during the construction phase any scientifically or culturally significant fossil material exist, it would be vital to recover the fossil and report the occurrence to the geological staff at the closest repository in the Eastern Cape / Northern Cape (e.g. the Albany Museum). (046 622 2312) and/or the South African Heritage Resources Agency (SAHRA) (021 642 4502) so that systematic and professional investigation/ excavation can be undertaken.	Contractor	Construction
If concentrations of archaeological materials are exposed during construction then all work must stop for an archaeologist to investigate.	Contractor	Construction
At Site 9 surface sampling should be conducted and the site should be monitored during construction. Stone Age Materials were identified close to turbine 2 and 29. The area should be demarcated or alternatively the engravings must be traced and documented and relocated to a museum.	Specialist	Construction
If any human remains (or any other concentrations of archaeological heritage material) are exposed during construction, all work must cease and it must be reported immediately to the nearest museum/archaeologist or to the South African Heritage Resources Agency, so that a systematic and professional investigation can be undertaken. Sufficient time should be allowed to investigate and to remove/collect such material.	Contractor	Construction
Monitoring of all substantial bedrock excavations for fossil remains by EO, with reporting of new finds to SAHRA and / or a professional palaeontologist for possible specialist mitigation (i.e. recording, judicious sampling of fossil material).	EO	Construction

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» Minimum disturbance outside of designated work areas</li> <li>» All heritage items located are dealt with as per the legislative guidelines</li> </ul>
<b>Monitoring and Reporting</b>	<ul style="list-style-type: none"> <li>» Observation of excavation activities by EO and ECO throughout construction phase.</li> <li>» Supervision of all clearing and earthworks.</li> <li>» An incident reporting system will be used to record non-conformances to the EMPr.</li> <li>» Public complaints register must be developed and maintained on site.</li> </ul>

## OBJECTIVE 11: Minimisation of visual impacts associated with construction

During construction heavy vehicles, components, cranes, equipment and construction crews will frequent the area and may cause, at the very least, a visual nuisance to landowners and residents in the area as well as road users.

<b>Project component/s</b>	<ul style="list-style-type: none"> <li>» Construction site</li> <li>» access roads</li> <li>» Wind turbines</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» The potential scarring of the landscape due to the creation of new access roads/tracks or the unnecessary removal of vegetation.</li> <li>» Construction traffic</li> </ul>
<b>Activity/risk source</b>	<ul style="list-style-type: none"> <li>» The viewing of visual scarring by observers in the vicinity of the facility or from the roads traversing the site</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» Minimal disturbance to vegetation cover in close vicinity to the proposed facility and its related infrastructure</li> <li>» Minimised construction traffic, where possible</li> </ul>

<b>Mitigation: Action/control</b>	<b>Responsibility</b>	<b>Timeframe</b>
The general appearance of construction activities, construction equipment camps and lay-down areas must be maintained and kept neat and tidy by means of the timely removal of rubble and disused construction materials.	Contractor	Construction
The turbines must be painted a pale, matt, non-reflective colour (i.e. off white, as specified by CAA) before erection of the turbines.	Contractor	Erection of turbines
Limit access to the construction sites (during both construction and operational phases) along existing access roads as far as possible.	Contractor	Duration of contract
Ensure all disturbed areas are appropriately rehabilitated once construction in an area is complete.	Contractor	Duration of construction

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» Construction site maintained in a neat and tidy condition.</li> <li>» Vegetation cover that remains intact with no erosion scarring in close proximity of the</li> </ul>
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	<ul style="list-style-type: none"> <li>» facility.</li> <li>» Site appropriately rehabilitated after construction is complete.</li> </ul>
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>» Monitoring of vegetation clearing during the construction phase.</li> <li>» Monitoring of rehabilitation activities to ensure appropriate rehabilitation of the site.</li> <li>» An incident reporting system will be used to record non-conformances to the EMPr.</li> <li>» Public complaints register must be developed and maintained on site.</li> </ul>

## OBJECTIVE 12: Appropriate handling and storage of chemicals, hazardous substances and waste

The construction phase of the wind energy facility will involve the storage and handling of a variety of chemicals including adhesives, abrasives, oils and lubricants, paints and solvents. The main wastes expected to be generated by the construction of the facility will include general solid waste, hazardous waste and liquid waste.

<b>Project component/s</b>	<ul style="list-style-type: none"> <li>» wind turbines</li> <li>» substation</li> <li>» concrete batching plant</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Release of contaminated water from contact with spilled chemicals</li> <li>» Generation of contaminated wastes from used chemical containers</li> <li>» Inefficient use of resources resulting in excessive waste generation</li> <li>» Litter or contamination of the site or water through poor waste management practices</li> </ul>
<b>Activity/risk source</b>	<ul style="list-style-type: none"> <li>» Vehicles associated with site preparation and earthworks</li> <li>» Power line construction activities</li> <li>» Substation construction activities</li> <li>» Packaging and other construction wastes</li> <li>» Hydrocarbon use and storage</li> <li>» Spoil material from excavation, earthworks and site preparation</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» To ensure that the storage and handling of chemicals and hydrocarbons on-site does not cause pollution to the environment or harm to persons</li> <li>» To ensure that the storage and maintenance of machinery on-site does not cause pollution of the environment or harm to persons</li> <li>» To comply with waste management legislation</li> <li>» To minimise production of waste</li> <li>» To ensure appropriate waste storage and disposal</li> <li>» To avoid environmental harm from waste disposal</li> </ul>

<b>Mitigation: Action/control</b>	<b>Responsibility</b>	<b>Timeframe</b>
<u>Waste management must be a priority and all waste must be collected and stored effectively</u>	<u>Contractor</u>	<u>Duration of contract</u>
The storage of flammable and combustible liquids such as oils must be in designated areas which are appropriately bunded, and stored in compliance with Material Safety Data Sheets (MSDS) files, as defined by the ECO.	Contractor	Duration of contract
Any spills will receive the necessary clean-up action.	Contractor	Duration of contract

Mitigation: Action/control	Responsibility	Timeframe
Bioremediation kits are to be kept on-site and used to remediate any spills that may occur. Appropriate arrangements to be made for appropriate collection and disposal of all cleaning materials, absorbents and contaminated soils (in accordance with a waste management plan).		
Any storage and disposal permits/approvals which may be required must be obtained, and the conditions attached to such permits and approvals will be complied with.	Contractor	Duration of contract
Routine servicing and maintenance of vehicles is not to take place on-site (except for emergency situations or large cranes which cannot be moved off-site). If repairs of vehicles must take place on site, an appropriate drip tray must be used to contain any fuel or oils.	Contractor	Duration of contract
Transport of all hazardous substances must be in accordance with the relevant legislation and regulations.	Contractor	Duration of contract
Waste disposal records must be available for review at any time.	Contractor	Duration of contract
Construction contractors must provide specific detailed waste management plans to deal with all waste streams.	Contractor	Duration of contract
Specific areas must be designated on-site for the temporary management of various waste streams, i.e. general refuse, construction waste (wood and metal scrap) and contaminated waste. Location of such areas must seek to minimise the potential for impact on the surrounding environment, including prevention of contaminated runoff, seepage and vermin control.	Contractor	Duration of contract
Where possible, construction and general wastes on-site must be reused or recycled. Bins and skips must be available on-site for collection, separation and storage of waste streams (such as wood, metals, general refuse etc.).	Contractor	Duration of contract
Disposal of waste must be in accordance with relevant legislative requirements, including the use of licensed contractors and licensed waste disposal sites.	Contractor	Duration of contract
Hydrocarbon waste must be contained and stored in sealed containers within an appropriately bunded area.	Contractor	Duration of contract
Waste and surplus dangerous goods must be kept to a minimum and must be transported by approved waste transporters to sites designated for their disposal.	Contractor	Duration of contract
Documentation (waste manifest) must be maintained detailing the quantity, nature and fate of any hazardous waste.	Contractor	Duration of contract
An incident/complaints register must be established and maintained on-site.	Contractor	Duration of contract

Mitigation: Action/control	Responsibility	Timeframe
Hazardous and non-hazardous waste must be separated at source. Separate waste collection bins must be provided for this purpose. These bins must be clearly marked and appropriately covered.	Contractors	Erection: during site establishment Maintenance: for duration of Contract within a particular area
All solid waste collected must be disposed of at a registered waste disposal site. A certificate of disposal must be obtained and kept on file. The disposal of waste must be in accordance with all relevant legislation. Under no circumstances may solid waste be burnt or buried on site.	Contractors	Erection: during site establishment Maintenance: for duration of Contract within a particular area
Supply waste collection bins at construction equipment and construction crew camps.	Contractors	Erection: during site establishment Maintenance: for duration of Contract within a particular area
Construction equipment must be refuelled within designated refuelling locations, or where remote refuelling is required, appropriate drip trays must be utilised.	Contractor	Duration of contract
All stored fuels to be maintained within a bund and on a sealed surface.	Contractor	Duration of contract
Fuel storage areas must be inspected regularly to ensure bund stability, integrity and function.	Contractor	Duration of contract
Construction machinery must be stored in an appropriately sealed area.	Contractor	Duration of contract
Oily water from bunds at the substation must be removed from site by licensed contractors.	Contractor	Duration of contract
Spilled cement and concrete must be cleaned up as soon as possible and disposed of at a suitably licensed waste disposal site.	Contractor	Duration of contract
Corrective action must be undertaken immediately if a complaint is made, or potential/actual leak or spill of polluting substance identified. This includes stopping the contaminant from further escaping, cleaning up the affected environment as much as practically possible and implementing preventive measures.	Contractor	Duration of contract
In the event of a major spill or leak of contaminants, the relevant administering authority must be immediately notified as per the notification of emergencies/incidents. Spill kits to be kept on-site	Contractor	Duration of contract
Any contaminated/polluted soil removed from the site must be disposed of at a licensed hazardous waste disposal facility.	Contractor	Duration of contract
Upon the completion of construction, the area will be cleared of potentially polluting materials.	Contractor	Completion of construction
<u>Waste management must be a priority and all waste must be collected and stored adequately. All waste must be removed from site on a weekly basis to prevent rodents</u>	<u>Contractor and Operation Manager</u>	<u>Live of operation</u>

Mitigation: Action/control	Responsibility	Timeframe
<u>and pests entering the site.</u>		
<u>Refuse bins will be emptied and secured. Temporary storage of domestic waste shall be in covered waste skips. Maximum domestic waste storage period will be 10 days</u>	<u>Contractor</u>	<u>Completion of construction</u>

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» No chemical spills outside of designated storage areas</li> <li>» No water or soil contamination by chemical spills</li> <li>» No complaints received regarding waste on site or indiscriminate dumping</li> <li>» Internal site audits ensuring that waste segregation, recycling and reuse is occurring appropriately</li> <li>» Provision of all appropriate waste manifests for all waste streams</li> </ul>
<b>Monitoring and Reporting</b>	<ul style="list-style-type: none"> <li>» Observation and supervision of chemical storage and handling practices and vehicle maintenance throughout construction phase.</li> <li>» A complaints register must be maintained, in which any complaints from the community will be logged. Complaints must be investigated and, if appropriate, acted upon.</li> <li>» Observation and supervision of waste management practices throughout construction phase.</li> <li>» Waste collection to be monitored on a regular basis.</li> <li>» Waste documentation completed.</li> <li>» An incident reporting system must be used to record non-conformances to the EMP.</li> <li>» The appointed ECO must monitor indicators listed above to ensure that they have been met for the construction phase</li> </ul>

### OBJECTIVE 13: Ensure disciplined conduct of on-site contractors and workers

In order to minimise impacts on the surrounding environment, Contractors must be required to adopt a certain Code of Conduct and commit to restricting construction activities to areas within the development footprint. Contractors and their sub-contractors must be familiar with the conditions of the Environmental Authorisation (once issued), the EIA Report and this EMPr, as well as the requirements of all relevant environmental legislation.

<b>Project component/s</b>	<ul style="list-style-type: none"> <li>» Wind energy facility</li> <li>» Associated infrastructure</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Pollution/contamination of the environment</li> <li>» Disturbance to the environment and surrounding communities</li> </ul>
<b>Activity/risk source</b>	<ul style="list-style-type: none"> <li>» Contractors are not aware of the requirements of the EMP, leading to unnecessary impacts on the surrounding environment</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» To ensure appropriate management of actions by on-site personnel in order to minimise impacts to the surrounding environment</li> </ul>

Mitigation: Action/control	Responsibility	Timeframe
Contractors must use chemical toilets/ablution facilities	Contractor (and sub-	Duration of contract



Mitigation: Action/control	Responsibility	Timeframe
situated at designated areas of the site; no abluting must be permitted outside the designated area. These facilities must be regularly serviced by appropriate contractors. Ablution facilities must not be placed within 100m from any river, wetland or drainage line.	contractor/s)	
Cooking must take place in a designated area. No firewood or kindling may be gathered from the site or surrounds.	Contractor (and sub-contractor/s)	Duration of contract
All litter must be deposited in a clearly marked, closed, animal-proof disposal bin in the construction area; particular attention needs to be paid to food waste.	Contractor (and sub-contractor/s)	Duration of contract
No one other than the ECO or personnel authorised by the ECO, will disturb flora or fauna outside of the demarcated construction area/s.	Contractor (and sub-contractor/s)	Duration of contract

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» Compliance with specified conditions of Environmental Authorisation, EIA report and EMPr.</li> <li>» No complaints regarding contractor behaviour or habits.</li> <li>» Code of Conduct drafted before commencement of construction phase and briefing session with construction workers held at outset of construction phase.</li> </ul>
<b>Monitoring and Reporting</b>	<ul style="list-style-type: none"> <li>» Observation and supervision of Contractor practices throughout construction phase.</li> <li>» A complaints register must be maintained, in which any complaints from the community are to be logged. Complaints must be investigated and, if appropriate, acted upon.</li> <li>» An incident reporting system must be used to record non-conformances to the EMPr.</li> </ul>

**OBJECTIVE 14: To avoid and or minimise the potential risk of increased veld fires during the construction phase.**

<b>Project component/s</b>	» Wind energy facility and associated infrastructure
<b>Potential Impact</b>	» Fires can pose a personal safety risk to local farmers and communities, and their homes, crops, livestock and farm infrastructure, such as gates and fences.
<b>Activity/risk source</b>	» Contractors are not aware of the requirements of the EMPr, leading to unnecessary impacts on the surrounding environment
<b>Mitigation: Target/Objective</b>	» To ensure appropriate management of actions by on-site personnel in order to minimise impacts to the surrounding environment

Mitigation: Action/control	Responsibility	Timeframe
Ensure that open fires on the site for cooking or heating are not allowed except in designated areas.	Contractor	Construction
Provide adequate firefighting equipment on-site.	Contractor	Construction
Provide fire-fighting training to selected construction	Contractor	Construction

<b>Mitigation: Action/control</b>	<b>Responsibility</b>	<b>Timeframe</b>
staff.		
Compensate farmers / community members at full market related replacement cost for any losses due to the wind energy facility project, such as livestock, damage to infrastructure etc.	Contractor	Construction

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» Designated areas for fires identified on site at the outset of the construction phase.</li> <li>» Firefighting equipment and training provided before the construction phase commences.</li> <li>» Compensation claims settled after claim verified by independent party.</li> </ul>
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>» A complaints register must be maintained, in which any complaints from the community are to be logged. Complaints must be investigated and, if appropriate, acted upon.</li> <li>» An incident reporting system must be used to record non-conformances in the EMPr.</li> </ul>

## 5.4. Detailing Method Statements

### **OBJECTIVE 15: Ensure all construction activities are undertaken with the appropriate level of environmental awareness to minimise environmental risk**

The environmental specifications are required to be underpinned by a series of Method Statements, within which the Contractors and Service Providers are required to outline how any identified environmental risks will practically be mitigated and managed for the duration of the contract, and how specifications within this EMPr will be met. That is, the Contractor will be required to describe how specified requirements will be achieved through the submission of written Method Statements to the Site Manager and ECO.

A Method Statement is defined as "a written submission by the Contractor in response to the environmental specification or a request by the Site Manager, setting out the plant, materials, labour and method the Contractor proposes using to conduct an activity, in such detail that the Site Manager is able to assess whether the Contractor's proposal is in accordance with the Specifications and/or will produce results in accordance with the Specifications". The Method Statement must cover applicable details with regard to:

- » Responsible person/s;
- » 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;
- » The containment (or action to be taken if containment is not possible) of leaks or spills of any liquid or material that may occur;
- » Timing and location of activities;
- » Compliance/non-compliance with the Specifications, and
- » Any other information deemed necessary by the Site Manager.

The Contractor may not commence the activity covered by the Method Statement until it has been approved, except in the case of emergency activities and then only with the consent of the Site Manager. Approval of the Method Statement will not absolve the Contractor from their obligations or responsibilities in terms of their contract.

## 5.5. Awareness and Competence: Construction Phase of the Renewable Energy Facility

**OBJECTIVE 16: To ensure all construction personnel have the appropriate level of environmental awareness and competence to ensure continued environmental due diligence and on-going minimisation of environmental harm**

To achieve effective environmental management, it is important that Contractors are aware of the responsibilities in terms of the relevant environmental legislation and the contents of this EMPr. The Contractor is responsible for informing employees and sub-contractors of their environmental obligations in terms of the environmental specifications, and for ensuring that employees are adequately experienced and properly trained in order to execute the works in a manner that will minimise environmental impacts. The Contractors obligations in this regard include the following:

- » Employees must have a basic understanding of the key environmental features of the construction site and the surrounding environment.
- » Ensuring that a copy of the EMPr is readily available on-site, and that all site staff are aware of the location and have access to the document. Employees will be familiar with the requirements of the EMPr and the environmental specifications as they apply to the construction of the facility.
- » Ensuring that, prior to commencing any site works, all employees and sub-contractors have attended an Environmental Awareness Training course. The course must provide the site staff with an appreciation of the project's environmental requirements, and how they are to be implemented.
- » Basic training in the identification of archaeological sites/objects, paleontological sites, and protected flora and fauna that may be encountered on the site.
- » Awareness of any other environmental matters, which are deemed necessary by the ECO.
- » Ensuring that appropriate communication tools are used to outline the environmental "do's" and "don'ts" (as per the environmental awareness training course) to employees.
- » Records must be kept of those that have completed the relevant training.
- » Refresher sessions must be held to ensure the contractor's staff are aware of their environmental obligations.

## 5.6. Monitoring Programme: Construction Phase of the Renewable Energy Facility

### **OBJECTIVE 17: To monitor the performance of the control strategies employed against environmental objectives and standards**

An environmental monitoring programme should be developed and implemented not only to ensure conformance with the EMPr, but also to monitor any environmental issues and impacts which have not been accounted for in the EMPr that are, or could result in, significant environmental impacts for which corrective action is required. The period and frequency of environmental monitoring will most likely be stipulated by the Environmental Authorisation.

Bird and/or bat monitoring should take place in line with guidelines or endorsed standards in South Africa, at the time of implementing the wind energy facility (refer to **Appendix I and J** for methodology as provided by the avifauna specialist contracted through the EIA). Where this is not clearly dictated, Castle Wind Farm (Pty) Ltd will determine and stipulate the period and frequency of monitoring required in consultation with relevant stakeholders and authorities. The Project Manager will ensure that the monitoring is conducted and reported.

The aim of the monitoring and auditing process would be to routinely monitor the implementation of the specified environmental specifications, in order to:

- » Monitor and audit compliance with the prescriptive and procedural terms of the environmental specifications
- » Ensure adequate and appropriate interventions to address non-compliance
- » Ensure adequate and appropriate interventions to address environmental degradation
- » Provide a mechanism for the lodging and resolution of public complaints
- » Ensure appropriate and adequate record keeping related to environmental compliance
- » Determine the effectiveness of the environmental specifications and recommend the requisite changes and updates based on audit outcomes, in order to enhance the efficacy of environmental management on site
- » Aid communication and feedback to authorities and stakeholders

The Environmental Control Officer (ECO) will monitor compliance with the EMPr during construction and will conduct monitoring activities on a regular basis. An independent ECO must be appointed and have the appropriate experience and qualifications to undertake the necessary tasks. The ECO will report any non-compliance or where corrective action is necessary to the Site Manager, DFFE and/or any other monitoring body stipulated by the regulating authorities.

## CHAPTER 6: MANAGEMENT PLAN FOR WIND ENERGY FACILITY: REHABILITATION OF DISTURBED AREAS

### 6.1. Overall Goal for the Rehabilitation of Disturbed Areas

**Overall Goal for the Rehabilitation of Disturbed Areas:** Undertake the rehabilitation measures in a way that:

- » Ensures rehabilitation of disturbed areas following the execution of the works, such that residual environmental impacts are remediated or curtailed.

### 6.2. Objectives

**Overall Goal for the Rehabilitation of Disturbed Areas:** Undertake the rehabilitation measures in a way that:

- » Ensures rehabilitation of disturbed areas following the execution of the works, such that residual environmental impacts are remediated or curtailed.

In order to meet this goal, the following objective, actions and monitoring requirements are relevant:

#### OBJECTIVE 1: To ensure rehabilitation of disturbed areas

Areas requiring rehabilitation will include all areas disturbed during the construction phase and that are not required for regular maintenance operations.

<b>Project component/s</b>	<ul style="list-style-type: none"> <li>» wind energy facility (including temporary access roads and laydown areas)</li> <li>» substation</li> <li>» temporary laydown areas</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Environmental integrity of site undermined resulting in reduced visual aesthetics, erosion, compromised land capability and the requirement for on-going management intervention</li> </ul>
<b>Activity/risk source</b>	<ul style="list-style-type: none"> <li>» Temporary laydown areas</li> <li>» Temporary access roads/tracks</li> <li>» Other disturbed areas/footprints</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» To ensure and encourage site rehabilitation of disturbed areas</li> <li>» To ensure that the site is appropriately rehabilitated following the execution of the works, such that residual environmental impacts (including erosion) are remediated or curtailed</li> </ul>

Mitigation: Action/control	Responsibility	Timeframe
A site rehabilitation programme should be compiled and implemented.	Contractor in consultation with Specialist	Duration of contract

Mitigation: Action/control	Responsibility	Timeframe
All temporary facilities, equipment and waste materials must be removed from site and appropriately disposed of.	Contractor	Following execution of the works
All temporary fencing and danger tape should be removed once the construction phase has been completed.	Contractor	Following completion of construction activities in an area
Necessary drainage works and anti-erosion measures must be installed, where required, to minimise loss of topsoil and control erosion.	Contractor	Following completion of construction activities in an area
Disturbed areas must be rehabilitated/re-vegetated with appropriate natural vegetation and/or local seed mix. Re-use native/indigenous plant species removed from disturbance areas in the rehabilitation phase.	Contractor in consultation with rehabilitation specialist	Following completion of construction activities in an area
Re-vegetated areas may have to be protected from wind erosion and maintained until an acceptable plant cover has been achieved.	Castle Wind Farm (Pty) Limited in consultation with rehabilitation specialist	Post-rehabilitation
On-going alien plant monitoring and removal should be undertaken on all areas of natural vegetation on an annual basis.	Castle Wind Farm (Pty) Limited in consultation with rehabilitation specialist	Post-rehabilitation
<u>All disturbed soil areas (including road and hard stand verges) should be compacted sufficiently and rehabilitated correctly with vegetation to avoid increased burrowing of rodents (which in turn could attract raptors and result in turbine collisions). These areas should also be effectively rehabilitated with indigenous grass/plant species as soon as possible after construction.</u>	<u>Castle Wind Farm (Pty) Limited in consultation with rehabilitation specialist</u>	<u>Following completion of construction activities in an area</u>

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» All portions of site, including construction camp and working areas, cleared of equipment and temporary facilities</li> <li>» Topsoil replaced on all areas and stabilised</li> <li>» Disturbed areas rehabilitated and at least 40% plant cover achieved on rehabilitated sites over a period of 2 to 5 years.</li> <li>» Closed site free of erosion and alien invasive plants</li> </ul>
<b>Monitoring and Reporting</b>	<ul style="list-style-type: none"> <li>» On-going inspection of rehabilitated areas in order to determine effectiveness of rehabilitation measures implemented.</li> <li>» On-going alien plant monitoring and removal should be undertaken on an annual basis.</li> <li>» An incident reporting system must be used to record non-conformances to the EMPr.</li> </ul>

## CHAPTER 7: MANAGEMENT PROGRAMME FOR THE WIND ENERGY FACILITY: OPERATION

An environmental manager should be appointed during operation whose duty it will be to minimise impacts on surrounding sensitive habitats, including wetlands. In addition, it is important to monitor the incidence of bird collisions with the wind turbines, as well as bat fatalities. Should any significant impacts of the facility on priority bird or bat populations be detected by the monitoring programmes, mitigation could be required to be investigated for those selected problem turbines.

### 7.1. Overall Goal for Operation

**Overall Goal for Operation:** To ensure that the operation of the wind energy facility does not have unforeseen impacts on the environment and to ensure that all impacts are monitored and the necessary corrective action taken in all cases. In order to address this goal, it is necessary to operate the wind energy facility in a way that ensures that operation activities are properly managed in respect of environmental aspects and impacts and enables the wind energy facility operation activities to be undertaken without significant disruption to other land uses in the area, in particular with regard to noise impacts, farming practices, traffic and road use, and effects on local residents as well as minimising impacts on birds and other fauna using the site.

### 7.2. Objectives

In order to meet this goal, the following objectives have been identified, together with necessary actions and monitoring requirements.

#### OBJECTIVE 1: Securing the site

Safety issues may arise with public access to wind turbines (e.g. unauthorised entry to the site) or to the wind farm substation. Prevention and control measures to manage public access are therefore important.

<b>Project component/s</b>	<ul style="list-style-type: none"> <li>» Wind turbines</li> <li>» access roads</li> <li>» substation</li> <li>» Operations and service building</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Hazards to landowners and public</li> </ul>
<b>Activities/risk sources</b>	<ul style="list-style-type: none"> <li>» Uncontrolled access to the wind energy facility and associated infrastructure.</li> </ul>
<b>Mitigation:</b>	<ul style="list-style-type: none"> <li>» To secure the site against unauthorised entry</li> </ul>
<b>Target/Objective</b>	<ul style="list-style-type: none"> <li>» To protect members of the public/landowners/residents</li> </ul>



Mitigation: Action/control	Responsibility	Timeframe
Where necessary to control access, fence and secure access to the site and entrances to the site.	Castle Wind Farm (Pty) Limited	Operation
Post information boards about public safety hazards and emergency contact information	Castle Wind Farm (Pty) Limited	Operation

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» Site is secure and there is no unauthorised entry</li> <li>» No members of the public/ landowners injured</li> </ul>
<b>Monitoring and Reporting</b>	<ul style="list-style-type: none"> <li>» Regular visual inspection of fence for signs of deterioration/forced access</li> <li>» An incident reporting system must be used to record non-conformances to the EMPr.</li> <li>» Public complaints register must be developed and maintained on site.</li> </ul>

## OBJECTIVE 2: Limit the ecological footprint of the facility

Indirect impacts on vegetation and terrestrial fauna during operation could result from maintenance activities and the movement of people and vehicles on site. In order to ensure the long-term environmental integrity of the site following construction, maintenance of the areas rehabilitated post-construction must be undertaken until these areas have successfully re-established.

<b>Project component/s</b>	<ul style="list-style-type: none"> <li>» Areas requiring regular maintenance</li> <li>» Route of the security team</li> <li>» Areas disturbed during the construction phase and subsequently rehabilitated at its completion</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Disturbance to or loss of vegetation and/or habitat</li> <li>» Alien plant invasion</li> <li>» Environmental integrity of site undermined resulting in reduced visual aesthetics, erosion, compromised land capability and the requirement for on-going management intervention.</li> </ul>
<b>Activity/Risk Source</b>	<ul style="list-style-type: none"> <li>» Movement of employee vehicles within and around site.</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» Maintain minimised footprints of disturbance of vegetation/habitats on-site.</li> <li>» Ensure and encourage plant regrowth in non-operational areas of post-construction rehabilitation.</li> </ul>

Mitigation: Action/Control	Responsibility	Timeframe
Vehicle movements must be restricted to designated roadways.	Castle Wind Farm (Pty) Ltd	Operation
Existing roads must be maintained to ensure limited erosion and impact on areas adjacent to roadways.	Castle Wind Farm (Pty) Ltd	Operation
Vegetation control within the facility should be by manual clearing and herbicides should not be used except to control alien plants in the prescribed manner	Castle Wind Farm (Pty) Ltd/ Specialist	Operation

An on-going alien plant monitoring and eradication programme must be implemented, where necessary.	Castle Wind Farm (Pty) Ltd	Operation
Annual site inspection for erosion or water flow regulation problems – with follow up remedial action where problems are identified	Castle Wind Farm (Pty) Ltd /Specialist	Annual monitoring until successful re-establishment of vegetation in an area

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» No further disturbance to vegetation or terrestrial faunal habitats</li> <li>» No erosion problems within the facility or along the power line route</li> <li>» Low abundance of alien plants within affected areas</li> <li>» Maintenance of a ground cover of perennial grasses and forbs that resist erosion</li> <li>» Continued improvement of rehabilitation efforts</li> </ul>
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>» Observation of vegetation on-site by environmental manager.</li> <li>» Regular inspections to monitor plant regrowth/performance of rehabilitation efforts and weed infestation compared to natural/undisturbed areas</li> <li>» Annual monitoring with records of alien species presence and clearing actions</li> <li>» Annual monitoring with records of erosion problems and mitigation actions taken with photographs</li> </ul>

### OBJECTIVE 3: Protection of avifauna, priority bird species and bat species

During operation of the facility, the threat of collision of birds and bats with the turbine blades is a concerning issue. However, the real extent of this threat is not currently well understood within the South African context due to the limited numbers of wind turbines in South Africa with which bird and bat interactions have been monitored. Lighting of turbines and other infrastructure has the potential to attract birds, thereby increasing the risk of collisions with turbines. Bird monitoring to be undertaken during the operation of the facility.

<b>Project component/s</b>	<ul style="list-style-type: none"> <li>» wind energy facility (turbines)</li> <li>» substation</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Disturbance to or loss of birds as a result of collision with the turbine blades</li> <li>» Disturbance to or loss of bats as a result of collision with turbines and/or barotrauma</li> <li>» Electrocutation and collision with the power line</li> </ul>
<b>Activity/risk source</b>	<ul style="list-style-type: none"> <li>» Spinning turbine blades</li> <li>» Substation</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» More accurately determine the impact of the operating wind energy facility on priority bird species</li> <li>» Minimise impacts associated with the substation</li> </ul>

Mitigation: Action/control	Responsibility	Timeframe
A site monitoring programme must be implemented for surveying bird and bat movements in relation to the	Castle Wind Farm (Pty) Ltd /	Operation

Mitigation: Action/control	Responsibility	Timeframe
wind energy facility and fully documenting all collision and electrocution casualties with the turbines and associated power line.	environmental manager	
Start post-construction bird and bat monitoring as soon as turbines become operational (i.e. when blades begin spinning, regardless of grid connection).	Monitoring agency	Once facility is operational
Periodically collate and analyse post-construction monitoring data for bird and bat monitoring.	Advising scientist/biologist	Every 3 months of monitoring
Review bird and bat monitoring report on the full year of post-construction monitoring and integrate findings into operational EMPr and broader mitigation scheme.	Advising scientist/biologist, monitoring agency	1 year post-construction
<u>Any significant impacts detected by post-construction monitoring must be mitigated where judged necessary by the avifaunal specialist. The onus is on the wind farm operator to have planned ahead for such an eventuality, particularly in respect of financial budgeting.</u>	<u>Monitoring agency</u>	<u>1 year post-construction</u>
<u>The local population of Verreaux's Eagle must be monitored for the full lifespan of the wind farm to ensure that any impacts are measured. This will require 2-3 visits to each of the 3 known nests (and any new ones subsequently found) during breeding season each year by a suitably qualified independent ornithologist.</u>	<u>Suitably qualified independent ornithologist</u>	<u>Annually</u>
<u>Ongoing monitoring is required to determine breeding status at nests of Verreaux's Eagles. Evidence of abandonment of breeding or compromised productivity of breeding Verreaux's Eagles, as a result of the wind farm and associated infrastructure, will require offset or compensation plans to be developed by a suitably qualified independent ornithologist.</u>	<u>Suitably qualified independent ornithologist</u>	<u>3 months following reports of abandonment of breeding or compromised productivity of breeding Verreaux's Eagles.</u>
<u>Develop and implement a mitigation plan (this could involve curtailment, shutdown on demand, habitat management, deterrence and any others available at the time of implementation).</u>	<u>Castle Wind Farm (Pty) Ltd and an advising independent ornithologist</u>	<u>3 Months from meeting threshold for action. Threshold for action: Regionally Red Listed species – 1 fatality</u>  <u>Other species of concern – 2 recorded fatalities</u>
<u>New road and hardstand verges on site after construction could create more favourable burrowing for ground burrowing small mammals such as Ground Squirrel. This could result in an inflated prey base for eagles close to turbines, and consequent higher turbine collision risk. It is essential that the Castle Wind Farm does not create favourable conditions for such mammals in high-risk areas. Discussions with civil engineers previously have determined that it is not possible to adequately compact road verges, drains and hard stand edges during construction to eliminate</u>	<u>Suitably qualified independent ornithologist</u>	<u>1 year post-construction</u>

Mitigation: Action/control	Responsibility	Timeframe
<u>such burrowing. It is therefore recommended then that within the first year of operations a full assessment of this aspect be made by the ornithologist contracted for post construction monitoring. If such burrowing is found case specific solutions to exclude these mammals from areas close to turbines will need to be developed.</u>		
<u>Any alterations of habitat and areas identified with the potential to increase raptor prey populations should be monitored and corrected through compaction or other deterrence's. This should be determined by audits at the beginning of the operational phase.</u>	<u>Castle Wind Farm (Pty) Ltd and an advising independent ornithologist</u>	<u>3 Months following audit findings.</u>

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» Minimal additional disturbance to bird or bat populations on the wind energy facility site.</li> <li>» Continued improvement of bird and bat protection devices, as informed by the operational monitoring.</li> <li>» Regular provision of clearly worded, logical and objective information on the interface between the local avifauna and bats and the proposed/ operating wind energy facility.</li> <li>» Clear and logical recommendations on why, how and when to institute mitigation measures to reduce avian and bat impacts of the development, from pre-construction to operational phase.</li> </ul>
<b>Monitoring and Reporting</b>	<ul style="list-style-type: none"> <li>» Observation of avifauna and bat populations and incidence of injuries/death from collisions from turbine blades</li> <li>» The monitoring team to monitor turbine field for fatalities.</li> <li>» Review of bird and bat monitoring report on the full year of post-construction monitoring</li> <li>» <u>Ongoing operational phase bird monitoring measures fatalities.</u></li> </ul>

#### OBJECTIVE 4: Minimisation of visual impact

The primary visual impact, namely the appearance and dimensions of the wind energy facility (mainly the wind turbines) is not possible to mitigate to any significant extent within this landscape. The functional design of the structures and the dimensions of the facility cannot be changed in order to reduce visual impacts. Alternative colour schemes (i.e. painting the turbines sky-blue, grey or darker shades of white) are not permissible as the CAA's Marking of Obstacles expressly states, "Wind turbines shall be painted white to provide the maximum daytime conspicuousness". Failure to adhere to the prescribed colour specifications will result in the fitting of supplementary daytime lighting to the wind turbines, once again aggravating the visual impact. The potential for mitigation is therefore low or non-existent.

Another source of glare light, albeit not as intense as flood lighting, is the aircraft warning lights mounted on top of the hub of the wind turbines. These lights are less aggravating due to the toned-down red colour, but have the potential to be visible from a great distance. The Civil Aviation Authority (CAA) prescribes these warning lights and the potential to mitigate their visual impacts is low. Indications are that

the facility may not be required to fit a light to each turbine, but rather place synchronous flashing lights on the turbines representing the outer perimeter of the facility. In this manner less warning lights can be utilised to delineate the facility as one large obstruction, thereby lessening the potential visual impact. The regulations for the CAA's *Marking of Obstacles* should be strictly adhered too, as the failure of complying with these guidelines may result in the developer being required to fit additional light fixtures at closer intervals thereby aggravating the visual impact.

The mitigation of secondary visual impacts, such as security and functional lighting, construction activities, etc. may be possible and should be implemented and maintained on an on-going basis. The operational, security and safety lighting fixtures of the proposed wind energy facility.

<b>Project component/s</b>	<ul style="list-style-type: none"> <li>» Wind energy facility (including access roads)</li> <li>» Substation</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Risk to aircraft in terms of the potential for collision</li> <li>» Enhanced visual intrusion</li> </ul>
<b>Activity/risk source</b>	<ul style="list-style-type: none"> <li>» Substation and associated lighting</li> <li>» Wind turbines and other infrastructure</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» To minimise potential for visual impact</li> <li>» To ensure that the facility complies with Civil Aviation Authority requirements for turbine visibility to aircraft</li> <li>» Minimise contrast with surrounding environment and visibility of the turbines to humans</li> <li>» The containment of light emitted from the substation in order to eliminate the risk of additional night-time visual impacts</li> </ul>

<b>Mitigation: Action/control</b>	<b>Responsibility</b>	<b>Timeframe</b>
Maintain the general appearance of the facility in an aesthetically pleasing way.	Castle Wind Farm (Pty) Ltd	Operation and maintenance
Undertake regular maintenance of light fixtures.	Castle Wind Farm (Pty) Ltd	Operation and maintenance

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» Appropriate visibility of infrastructure to aircraft</li> <li>» The effective containment of the light to the substation site</li> </ul>
<b>Monitoring and Reporting</b>	<ul style="list-style-type: none"> <li>» Ensure that aviation warning lights or other measures are installed before construction is completed and are fully functional at all time</li> <li>» The monitoring of the condition and functioning of the light fixtures during the operational phase of the project.</li> </ul>

## OBJECTIVE 5: Minimisation of noise impacts from turbines

From the results of the EIA studies undertaken, noise impacts associated with the wind energy facility are expected to be of low significance. However, mitigation measures are proposed in order to further reduce any potential for noise impact. The rating level in the area for the wind energy facility is likely to be 35 dBA at night. That would also be the “lower limit”. Due to the limited noise receptors in and around the site (as identified in the noise impact assessment report), noise from the turbine is unlikely to negatively affect any residents in the broader study area.

<b>Project component/s</b>	» Wind turbines
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Increased noise levels at potentially sensitive receptors</li> <li>» Changing ambient sound levels could change the acceptable land use capability</li> <li>» Disturbing character of sound</li> </ul>
<b>Activity/risk source</b>	» Wind turbines
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» Ensure that the change in ambient sound levels (measured in <math>L_{Aeq}</math>) as experienced by Potentially Sensitive Receptors is less than 5 dBA; (change from the measured and calculated ambient sound levels for the corresponding wind speed);</li> <li>» Prevent the generation of disturbing noise from the wind turbines;</li> <li>» Ensure acceptable noise levels at surrounding stakeholders and potentially sensitive receptors</li> </ul>

<b>Mitigation: Action/control</b>	<b>Responsibility</b>	<b>Timeframe</b>
Design and implement a noise monitoring programme. Define the ambient sound levels in 10 minute bins over a period of at least 7 days before the operational phase starts inside. 10 minute sampling bins should be co-ordinated with 10 m/s wind speed.	Castle Wind Farm (Pty) Ltd / Acoustical Consultant / Approved Noise Inspection Authority	Operation
If required, additional noise monitoring points at a complainant that registered a valid and reasonable noise complaint relating to the operation of the facility	Castle Wind Farm (Pty) Ltd / Acoustical Consultant / Approved Noise Inspection Authority	Operation

<b>Performance Indicator</b>	» Change in ambient sound levels ( $L_{Aeq}$ ) as experienced by Potentially Sensitive Receptors is less than 5 dBA
<b>Monitoring and Reporting</b>	» Noise monitoring programme to be developed and implemented at the start of operation.

**OBJECTIVE 6: Appropriate handling and management of hazardous substances and waste**

The operation of the wind energy facility will involve the generation of limited waste products. The main wastes expected to be generated by the operation activities includes general solid waste and hazardous waste.

<b>Project component/s</b>	<ul style="list-style-type: none"> <li>» Wind energy turbines</li> <li>» Substation</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Inefficient use of resources resulting in excessive waste generation</li> <li>» Litter or contamination of the site or water through poor waste management practices</li> </ul>
<b>Activity/risk source</b>	<ul style="list-style-type: none"> <li>» Generators and gearbox - turbines</li> <li>» Transformers and switchgear - substation</li> <li>» Fuel and oil storage</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» To comply with waste management legislation</li> <li>» To minimise production of waste</li> <li>» To ensure appropriate waste disposal</li> <li>» To avoid environmental harm from waste disposal</li> </ul>

<b>Mitigation: Action/control</b>	<b>Responsibility</b>	<b>Timeframe</b>
Hazardous substances must be stored in sealed containers within a clearly demarcated designated area.	Castle Wind Farm (Pty) Ltd	Operation
Storage areas for hazardous substances must be appropriately sealed and bunded.	Castle Wind Farm (Pty) Ltd	Operation
All structures and/or components replaced during maintenance activities must be appropriately disposed of at an appropriately licensed waste disposal site or sold to a recycling merchant for recycling.	Castle Wind Farm (Pty) Ltd	Operation
Care must be taken to ensure that spillage of oils and other hazardous substances are limited during maintenance. Handling of these materials should take place within an appropriately sealed and bunded area. Should any accidental spillage take place, it must be cleaned up according to specified standards regarding bioremediation.	Castle Wind Farm (Pty) Ltd	Operation and maintenance
Waste handling, collection and disposal operations must be managed and controlled by a waste management contractor.	Castle Wind Farm (Pty) Ltd / waste management contractor	Operation
Used oils and chemicals: <ul style="list-style-type: none"> <li>» Where these cannot be recycled, appropriate disposal must be arranged with a licensed facility in consultation with the administering authority.</li> <li>» Waste must be stored and handled according to the relevant legislation and regulations.</li> </ul>	Castle Wind Farm (Pty) Ltd	Operation

Mitigation: Action/control	Responsibility	Timeframe
General waste must be recycled where possible or disposed of at an appropriately licensed landfill.	Castle Wind Farm (Pty) Ltd	Operation
Hazardous waste (including hydrocarbons) and general waste must be stored and disposed of separately.	Castle Wind Farm (Pty) Ltd	Operation
Disposal of waste must be in accordance with relevant legislative requirements, including the use of licensed contractors.	Castle Wind Farm (Pty) Ltd	Operation
No waste may be burned or buried on site.	Castle Wind Farm (Pty) Ltd	Operation

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» No complaints received regarding waste on site or dumping.</li> <li>» Internal site audits identifying that waste segregation, recycling and reuse is occurring appropriately.</li> <li>» Provision of all appropriate waste manifests.</li> <li>» No contamination of soil or water.</li> </ul>
<b>Monitoring and Reporting</b>	<ul style="list-style-type: none"> <li>» Waste collection must be monitored on a regular basis.</li> <li>» Waste documentation must be completed and available for inspection on request.</li> <li>» An incidents/complaints register must be maintained, in which any complaints from the community must be logged. Complaints must be investigated and, if appropriate, acted upon.</li> <li>» Regular reports on exact quantities of all waste streams exiting the site must be compiled by the waste management contractor and monitored by the environmental manager. All appropriate waste disposal certificates must accompany the monthly reports.</li> </ul>

## OBJECTIVE 7: Maximise local employment and business opportunities during operation

Based on information provided by Castle Wind Farm (Pty) Ltd less than 10 permanent employment opportunities will be created during the operational phase of the project. The operational phase is expected to last for 20 years.

<b>Project component/s</b>	<ul style="list-style-type: none"> <li>» Wind energy facility</li> <li>» Day to day operational activities associated with the wind energy facility including maintenance etc.</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» The opportunities and benefits associated with the creation of local employment and business should be maximised.</li> </ul>
<b>Activity/risk source</b>	<ul style="list-style-type: none"> <li>» The operational phase of the wind energy facility will create permanent employment opportunities.</li> <li>» The establishment of a wind energy facility has the potential to create and attraction for visitors to the area. The development also has the potential to promote the benefits of renewable energy projects.</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» In the medium- to long-term employ as many locals as possible to fill the full time employment opportunities.</li> </ul>



Mitigation: Action/control	Responsibility	Timeframe
Identify local members of the community who are suitably qualified or who have the potential to be employed full time.	Castle Wind Farm (Pty) Ltd	Prior to commencement of operation
Develop training and skills transfer programme for local personnel.	Castle Wind Farm (Pty) Ltd	Prior to commencement of operation

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» Public exposure to the project.</li> <li>» Meeting with Local Municipality and local tourism organisations during the construction phase.</li> </ul>
<b>Monitoring and Reporting</b>	<ul style="list-style-type: none"> <li>» Indicators listed above must be met for the operational phase.</li> </ul>

### OBJECTIVE 8: Implement an appropriate fire management plan during the operation phase

The vegetation in the study area may be at risk of fire. The increased presence of people on the site could increase the risk of veld fires, particularly in the dry season.

<b>Project Component/s</b>	» Operation and maintenance of the wind energy facility and associated infrastructure.
<b>Potential Impact</b>	» Veld fires can pose a personal safety risk to local farmers and communities, and their homes, crops, livestock and farm infrastructure, such as gates and fences. In addition, fire can pose a very minor risk to the wind energy facility infrastructure.
<b>Activities/Risk Sources</b>	» The presence of operation and maintenance personnel and their activities on the site can increase the risk of veld fires.
<b>Mitigation: Target/Objective</b>	» To avoid and or minimise the potential risk of veld fires on local communities and their livelihoods.

Mitigation: Action/Control	Responsibility	Timeframe
Provide adequate firefighting equipment on site. Apply for membership to local Fire Protection Association, should there be one in existence.	Castle Wind Farm (Pty) Ltd	Operation
Provide fire-fighting training to selected operation and maintenance staff.	Castle Wind Farm (Pty) Ltd	Operation
Ensure that appropriate communication channels are established to be implemented in the event of a fire.	Castle Wind Farm (Pty) Ltd	Operation
Fire breaks should be established where and when required. Cognisance must be taken of the relevant legislation when planning and burning firebreaks (in terms of timing, etc.). Access roads may also act as fire breaks.	Castle Wind Farm (Pty) Ltd	Operation
Upon completion of the construction phase, an emergency evacuation plan must be drawn up to ensure the safety of the staff and surrounding land users in the case of an emergency.	Castle Wind Farm (Pty) Ltd	Operation

Mitigation: Action/Control	Responsibility	Timeframe
Contact details of emergency services should be prominently displayed on site.	Castle Wind Farm (Pty) Ltd	Operation

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» Firefighting equipment and training provided before the construction phase commences.</li> <li>» Appropriate fire breaks in place.</li> </ul>
<b>Monitoring and Reporting</b>	<ul style="list-style-type: none"> <li>» Castle Wind Farm (Pty) Ltd must monitor indicators listed above to ensure that they have been met.</li> </ul>

### OBJECTIVE 9: Minimise the potential negative impact on farming activities and on the surrounding landowners

Once operational, the negative impact on the daily living and movement patterns of neighbouring residents is expected to be minimal and intermittent (i.e. the increase in traffic to and from site, possible dust creation of vehicle movement on gravel roads on site and possible increase in criminal activities). The number of workers on site on a daily basis is anticipated to have minimal negative social impacts in this regard.

Some positive impacts will be experienced with farmers gaining more access to land through the high quality site roads. Farmers involved with the project will also receive additional income, which can be invested into farming activities.

Once construction is completed, negative impacts on farming activities on the site must be limited as far as possible.

<b>Project Component/s</b>	<ul style="list-style-type: none"> <li>» Possible negative impacts of activities undertaken on site on the activities of surrounding property owners.</li> <li>» Impact on farming activities on site.</li> </ul>
<b>Potential Impact</b>	<ul style="list-style-type: none"> <li>» Limited intrusion impact on surrounding land owners.</li> <li>» Interference with farming activities on site.</li> </ul>
<b>Activities/Risk Sources</b>	<ul style="list-style-type: none"> <li>» Increase in traffic to and from site could affect daily living and movement patterns of surrounding residents.</li> <li>» Operational activities on site could interfere with farming activities of landowner.</li> </ul>
<b>Mitigation: Target/Objective</b>	<ul style="list-style-type: none"> <li>» Effective management of the facility.</li> <li>» Mitigation of intrusion impacts on property owners.</li> <li>» Mitigation of impact on farming activities.</li> </ul>

Mitigation: Action/Control	Responsibility	Timeframe
Effective management of the facility and accommodation facility to avoid any environmental pollution focusing on water, waste and sanitation infrastructure and services.	Castle Wind Farm (Pty) Ltd	Operation

Mitigation: Action/Control	Responsibility	Timeframe
Vehicle movement to and from the site should be minimised as far as possible.	Castle Wind Farm (Pty) Ltd & Employees	Operation
Local roads should be maintained to keep the road surface up to a reasonable standard.	Castle Wind Farm (Pty) Ltd	Operation
Limit the development of new access roads on site.	Castle Wind Farm (Pty) Ltd	Operation
Ensure on-going communication with the landowners of the site in order to ensure minimal impact on farming activities	Castle Wind Farm (Pty) Ltd	Operation

<b>Performance Indicator</b>	<ul style="list-style-type: none"> <li>» No environmental pollution occurs (i.e. waste, water and sanitation).</li> <li>» No intrusion on private properties and on the activities undertaken on the surrounding properties.</li> <li>» Continuation of farming activities on site.</li> </ul>
<b>Monitoring and reporting</b>	<ul style="list-style-type: none"> <li>» Castle Wind Farm (Pty) Ltd should be able to demonstrate that facility is well managed without environmental pollution and that the above requirements have been met.</li> </ul>

## **CHAPTER 8: MANAGEMENT PLAN FOR WIND ENERGY FACILITY: DECOMMISSIONING**

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The turbine infrastructure which will be utilised for the proposed Wind Energy Facility is expected to have a lifespan of 25 to 30 years (with maintenance). Equipment associated with this facility would only be decommissioned once it has reached the end of its economic life. It is most likely that decommissioning activities of the infrastructure of the facility would comprise the disassembly and replacement of the turbines with more appropriate technology/infrastructure available at that time. The relevant mitigation measures contained under the construction section should be applied during decommissioning and therefore is not repeated in this section. It must be noted that decommissioning activities will need to be undertaken in accordance with the legislation applicable at that time, which may require this section of the EMPr to be revisited and amended.

### **8.1. Site Preparation**

Site preparation activities will include confirming the integrity of the access to the site to accommodate required abnormal load equipment and lifting cranes, preparation of the site (e.g. lay down areas, construction platform) and the mobilisation of construction equipment.

### **8.2 Disassemble and Remove Existing Components**

The wind (turbine and tower sections) of the proposed facility will be disassembled once it reaches the end of its economic lifespan. A large crane would be required for disassembling the turbine and tower sections. Once disassembled, the components will be reused, recycled, or disposed of in accordance with regulatory requirements (NEMA / NEM:WA). All parts of the turbine would be considered reusable or recyclable except for the blades.

### **8.2 Rehabilitation of the Site**

In order to minimise the extent of rehabilitation activities required during the decommissioning phase, Castle Wind must ensure that constant effort is applied to rehabilitation activities throughout the construction, operation and maintenance phases of the project.

In decommissioning the facility, Castle Wind must ensure that:

- » All sites not already vegetated are vegetated as soon as possible after operation ceases with species appropriate to the area.
- » Any fauna encountered during decommission should be removed to safety by a suitably qualified person,
- » All structures, foundations and sealed areas are demolished, removed and waste material disposed of at an appropriately licensed waste disposal site.
- » All access/service roads not required to be retained by landowners are closed and fully rehabilitated.

- » All vehicles to adhere to low speed limits (40km/h max) on the site, to reduce risk of faunal collisions as well as reduce dust.
- » All disturbed areas are compacted, sloped and contoured to ensure drainage and runoff and to minimise the risk of erosion.
- » All rehabilitated areas are monitored for erosion.
- » Components of the facility are removed from the site and disposed of appropriately.
- » Retrenchments should comply with South African Labour legislation of the day.

The section on Rehabilitation (Chapter 6) is also relevant to the decommissioning of sections of the proposed distribution line and must be adhered to.

