

This document is an Environmental Control document. It's purpose it is to aid in the management of the substation construction expansion project by identifying Environmental and Health and Safety aspects and to direct reasonable measures that should be employed to mitigate them.

Early on, the document identifies the Roles, Relationships and lines of Communication that that are deemed necessary for the success of the project. Please use the following table to identify the players in the project team and community within which the project is to be implemented.

ROLE DESCRIPTION	Contact details
Client - Contract Manager: Ultimate decision	
maker	
Client - Project Manager: Smooth running of the	
project Authorised Environmental Authority:	
,	
Environmental Management of project Client – Environmental Control Officer	
Communicate EMP – induction; Police EMP –	
monitoring & reporting; Communication in advance	
with landowner; Appraisal of crop & environmental	
damage	
Contractor Environmental Liaison Officer	
Internal environmental performance;	
Communication in advance with landowner;	
Punctual and amicable solutions to site	
environmental problems	
Contractor Landowner Liaison Officer	
Relationship manager – investigation of incidents	
as captured on site – covers in absence of ECO	
Contractor -Site Manager	
Oversees site works	
Abides by SHE Golden Rules	
Contractor – Appointed H&S Officer	
Monitors H&S against Golden Rules	
DEAT – Assigned Project Officer	
DACE – Extension Officer	
SAHRA – Area Representative	
Landowner	
Local Fire Protection officer	
Local Security Service Provider	
Local Social Services NGO	
Local General Trading Store or Co-op	
Local Parks Board Wildlife Protection Officer	

EXECUTIVE SUMMARY

For development projects such as substation expansion, an Environmental Management Programme is demanded by standards of World Best Practice. Increasingly, Corporate organizations are coming under the scrutiny of the public eye. An Environmental Management Programme must be relevant and it must integrate broadly, all reasonable measures required to manage identified risks.

This Environmental Management Programme (EMP) is prepared as a requirement of the Record of Decision (RoD) issued by the Department of Environment Affairs & Tourism (DEAT) Project Ref: 12/12/20/433, issued 2nd March 2007 (see copy attached).

Responsibility and Accountability

Eskom is accountable and responsible for the implementation of the EMP and for any contractor non-compliance. Hence the detailed nature of this document and the need for the Contractor to implement it, and the CECO to facilitate it and police it. Specific requirements for the implementation of the EMP are given in the following sections of the RoD:

- Section 3.2.1 Environmental Control Officer (referred to here as the CECO)
- Section 3.2.2 Environmental Management Plan
- Section 3.2.3 Rehabilitation after construction
- Section 3.2.4 Monitoring and auditing
- Section 3.2.6 Compliance with other legislation

Eskom, through the CECO, is to ensure compliance with the requirements set out in the above sections of the RoD.

It is a legal document – on completion of induction of the Contractor Manager/Director by the Client Environmental Control Officer (CECO), mandatory performance of the Contractor will be measured against its requirement contents.

Implementation

This EMP is a working document based on the plan, do, check and act model of work system flow. The structure of the Safety, Health and Environmental Management Programme is recurring for each Aspect identified –

- 1. Communication for Success identifying role/s and responsibility, a
- 2. Summary table of Reasonable Measures to Mitigate Impacts associated with the highlighted Aspect;
- 3. Golden Rules providing overarching actions leading to compliance; and

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4. Description of what is to be monitored to objectively decide whether or not the requirements of the Environmental Management Programme are being met.

Furthermore, each Aspect highlighted includes a checklist/tickbox for the contractor to tick off his/her consideration of the risk and potential mitigation measure that he has considered and implemented. Essentially the checklist forms the table of contents for that specific aspect within the Environmental Management Plan and goes along way in moving those who will tender forward toward meeting compliance for site documentation and records as required by the Client.

Golden Rules have been captured for each Aspect to draw the contractors attention to critical actions and knowledge that must be taken into account toward averting incidents, accidents and Safety, Health and Environmental risk. The checklists and Golden Rules are imperatives, reminders and prompts to aid day-to-day planning and management by the project management team.

Specialists input from Ecological and Archaeological perspectives indicate that, provided the recommendations made are adhered to, environmental risk is low. However, due caution is required near the wetland area on site. Furthermore, care should be taken during excavation not to disturb potential archaeological artefacts. If a new discovery is made, construction at that place must be halted and a specialist archaeologist brought to site top assess the find. Adhering to the Ecological and Archaeological recommendations herein is crucial to the success of the project.

As a working document, the CECO will continually review and update as necessary this EMP. It is to be noted that all revisions of the EMP need to be submitted to DEAT for approval (see details in the RoD).

Auditing, reporting and record keeping

- The CECO is to keep a site diary and registers as set out in Section 3.2.1.4 of the RoD. All instructions, incidents, public complaints and site audits are to be recorded.
- The CECO is to ensure quarterly independent environmental performance audits are carried out and submitted to DEAT.
- Fortnightly (every two weeks) progress and environmental reports are to be submitted to the Eskom Environmental Advisor by the CECO.
- Additionally environmental compliance reports are to be submitted to DEAT every two months by the CECO after review by the Eskom Environmental Advisor.

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1.0 INTRODUCTION

The construction, refurbishment or upgrading of Substations can have a major impact on the environment. Construction of a new substation and upgrading of an existing facility are regulated by legislation under the Environment Conservation Act, 73 of 1989 and more recently under the amendments to the National Environmental Management Act, 107 of 1998. Numerous risks require consideration and management intervention during the construction phase of a development project. This Environmental Management Programme (EMP) serves to highlight and pre-empt those risks by introducing imperatives for implementation by construction personnel to protect, conserve and sustain the environment associated with the construction project.

This EMP shall be included as part of the contract and supplementary to Eskom's specifications for the contract. Its contents are enforceable under the general conditions of contract and the contractor must ensure that the tender price submitted covers all costs of compliance with it. It is a working document. It will be implemented throughout the duration of the project and necessarily amended as the responsibility for environmental management is fulfilled, adapted and amended and again fulfilled.

Challenges during different phases of the project

The main challenge of the expansion project will be the maintenance of harmonious relations between the project players – Client (Eskom), Landowner and Contractor. The tables below serve to draw the attention of the contractor to real issues that there is a strong probability will need to be addressed. These each impact on the project schedule and thus require particular consideration and ongoing initiative and resourcefulness in maintaining excellent customer relations.

1. Pre-construction

Challenge	Potential Solution
 Landowners will see the construction period as interference with their daily activities Landowners are always apprehensive toward changes they do not control and strangers on their properties 	 Client Environmental Control Officer to communicate project plan, starting date and sequence of events well in advance to the landowner in a specifically scheduled landowner induction meeting – minutes of landowner queries to kept and addressed!

2. During Construction

	Challenge		Potential Solution
1.	Due to the current security situation Landowners are not comfortable when strangers come on to their properties	•	Engage landowner on his/her security arrangements. Adjust operational plan to fit. Adequately define roles and in the induction
2.	They will look for reasons to interfere with the construction process and may therefore cause delays in the process that can be very costly to Eskom and the Contractor		carefully explain the SHE standard required by the contractor. The landowner is behold unto the standard every time he/she visits the site. Keep a site visit register.
3.	Illegal collection of firewood or use of private amenities can cause problems with Landowners and communities that may lead to disruptions of the construction process	•	Clearly communicate Golden Rules to all construction site personnel and agree on fines for breach of rules prior to site establishment. Have all construction site personnel sign off on
4.	Damage to fences, gates and other infrastructure may occur at any time		formal SHE induction.
5.	The use of private roads for construction purposes always leads to damage due to heavy equipment and frequent use - especially during the rainy season	•	Ensure that a road repair team is designated and equipped – draft into emergency plans the role of the road repair team to attend to rapid repair of roads and a roster for responsibility after hours. Record of road condition prior to commencement of construction

3. Post Construction

Challenge	Potential Solution
Fire Hazard	 Plans to manage the threat of fire must begin once the tender has been awarded to the contractor. It is in the interest of both Eskom and the Landowner to engage early on to work together to understand and implement a plan of action to use fire to manage vegetation and guard against wild fire threat. The Client Environmental Control Officer must facilitate this process early on.

Eskom is ultimately accountable for the completion of the project according to the requirements of the Safety, Health and Environmental Management Programme. As an organization it seeks to partner with the Contractor to realize the successful implementation of its Safety, Health and Environmental Management Programme and ultimately completion of the expansion project.

2.0 PROJECT SCOPE

Zeus substation is located within an area of agricultural land-use. Land immediately adjacent to the existing substation where the expansion is planned has current grazing use. The substation is being expanded to more than double its current footprint to accommodate infrastructure for new 765kV lines. The expanded addition will cover an area of 700m x 400m (28ha).



Figure Area for expansion is to the right of the existing substation as orientated this photograph

The expansions design is accordance with Eskom's standards of pollution control, fire hazard prevention and storm water management.

3.0 COMMUNICATION

3.1 Relationships - Organization of Responsibility and Lines of Communication

Good working relationships and open lines of communication are essential for the success of any project. Eskom Transmission must appoint a Client Environmental Control Officer for the duration of the construction and rehabilitation period. The role of Client Environmental Control Officer (CECO) is pivotal in ensuring a clear understanding of the EMP by the contractor and it's complete implementation, monitoring and reporting. Furthermore, the CECO must ensure that landowner-contractor working relationships remain open and intact. Above all, the CECO must ensure that all project players have received a complete induction covering all aspects identified within this EMP.

It is incumbent on the Lead Contractor to appoint **Contractor Landowner Liaison** and **Contractor Environmental Liaison Officers (CLLO & CELO)**. Relating with the CECO and Contractor Site Manager, it is the role of the CLLO to manage the relationship between the Contractor and the Landowner – making requests in advance and in-line with the EMP and reporting on any incidence. This role substitutes for the CECO when that person is not available.

CECO Key Performance Indicator	Performance Expectation	
Communicate fully the Site Safety, Health and	40%	
Environmental Management Programme	Sign-off by all players including Landowner and all site	
	personnel on induction performed and understood	
Monitoring and enforcement by fine of all	25%	
Environmental Aspects	Monthly audits and daily impromptu site walks	
Attendance and minute weekly Health & Safety	25%Submission of weekly H&S minutes to Project	
meetings	Manager	
Monthly reporting on Environmental Performance	2.5%Reports submitted to the Regional Environmental	
	Advisor:	
Keep detailed notes and photographic records of the	2.5%Monthly reporting on compliance with Site Safety,	
project progress as well as any non-compliances	Health and Environmental Management Programme	
Keep all affected parties in the loop on any changes to	5%	
the project programme	Regular telephonic communication and confirmations	
	of discussions via email	
Maintain good relations	1. No project delays as a result of poor	
	communication	
	2. No claims from the Landowner or communities	
	 All claims investigated and settled within one month 	
	4. No litigation due to unsettled claims	

The Contractor site manager has full responsibility for the operational implementation of the project. This role is required to monitor Environmental as well as Health and Safety performance as they happen and with reference to the checks against the contents of this document. The Contractor Appointed Health and Safety Officer has the crucial role of monitoring Health and Safety performance as it happens.

Contractor Site Manager Key Performance Indicator	Performance Expectation as a function of time
	spent and tangible evidence
Communicate and enforce throughout the duration of	Negative response <5%
the project the Site Safety, Health and Environmental	Quick reaction to landowner complaints
Management Programme	*Record/copy of all landowner agreements and
	communication
Administer disciplinary action for offenders who do not	<10%
comply	Records of staff performance, formal counselling and
	written warnings
Create and Administer files and records in accordance	30%
with the check lists set out herein	Record of SHE performance
	Minutes of weekly Health & Safety meetings
Ensure the smooth running of the project according to	5%
the project schedule	Monitor progress against project plan or Gantt –
	available on site
Enforce all Construction Site Golden Rules as set out	50%
herein	
Maintain Landowner/community	2.5%
complaints/compliments register	Report on register contents at weekly health and
	safety meeting
Maintain good relations	No project delays as a result of poor communication

* All negotiations for any reason shall be between the CECO, the affected parties and the Contractor. NO verbal agreements shall be

made. All agreements shall be recorded in writing and all parties shall co-sign the documentation.

Contractor Appointed Health and Safety Officer	Performance Expectation
Influence Construction Site Health & Safety	50%
Performance	Evidence of Health & Safety File and well kept stores -
	PPE, Chemical & fuel store, correct use of PPE
	enforced on site
Chair Health and Safety meetings	5%
	Enforce improvements
Maintain PPE inventory	2.5%
	Immaculate store kept under lock and key
Maintain records of machinery technical inspections	5%
Enforce Health & Safety Golden Rules	40%

In addition, the Contractor having engaged with the landowner, will need to establish contact local services networks and to further initiate working relations. A column is provided in the responsibility matrix table that follows where contact details of people assigned these roles may be captured for reference and use.

Table Responsibility matrix for Zeus substation construction

Client - Contract Manager: Ultimate decision maker Client - Project Manager: Smooth running of the project Authorised Environmental Authority: Environmental Management of project Client - Environmental Control Officer Communicate EMP - induction; Police EMP - monitoring & reporting; Communication in advance with landowner; Appraisal of crop & environmental damage Contractor Environmental Liaison Officer Internal environmental performance; Communication in advance with landowner; Punctual and amicable solutions to site environmental problems Contractor Landowner Liaison Officer Relationship manager - investigation of incidents as captured on site - covers in absence of ECO Contractor - Site Manager Oversees site works Abides by SHE Golden Rules Contractor - Appointed H&S Officer Monitors H&S against Golden Rules DEAT - Assigned Project Officer DACE - Extension Officer Landowner Local Service Provider Local Service NGO Local General Trading Store or Co-op Local General Trading Store or Co-op Local Parks Board Wildli	ROLE DESCRIPTION	Contact details
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Local Security Service Provider Local Social Services NGO Local General Trading Store or Co-op	Landowner	
Local Social Services NGO Local General Trading Store or Co-op	Local Fire Protection officer	
Local General Trading Store or Co-op	Local Security Service Provider	
	Local Social Services NGO	
Local Parks Board Wildlife Protection Officer	Local General Trading Store or Co-op	
	Local Parks Board Wildlife Protection Officer	

If the CECO is not on site the Contractor should keep the affected parties informed. The contact numbers of the Contractor and the ECO shall be made available to the affected parties. This will ensure open channels of communication and prompt response to queries and claims.

All contact with the affected parties shall be courteous at all times. The rights of the affected parties shall be respected at all times.

The CECO shall convey the contents of this document to the Contractor site staff and discuss the contents in detail with the Client Project Manager and Contractor Site Manager.

Eskom requires a commitment from the Contractor to consider the following:

- 1. The legal rights of the individual Landowner, Communities and Eskom Regional staff.
- 2. Professional etiquette on and off site.
- 3. Ensure quality in all work done, technical and environmental.
- 4. Immediate resolution to problems and claims arising from damage thus ensuring smooth flow of operations.
- 5. To underwrite Eskom's Environmental Policy at all times.
- 6. To use this Environmental Management Programme for the benefit of all involved.
- 7. To preserve the natural environment by limiting any destructive actions on site.

No work shall commence until permission is granted from the Environmental Advisor from Transmission Engineering and the ROD from DEAT has been obtained. The Project Manager shall ensure that all conditions in the ROD are fulfilled before the Contractor occupies the site.

3.2 Monitoring and Reporting Roles

The CECO shall keep a photographic record of any damage to areas outside the demarcated site area. The date, time of damage, type of damage and reason for the damage shall be recorded in full to ensure the responsible party is held liable. All claims for compensation emanating from damage should be directed to the CECO for appraisal. A register shall be kept of all complaints from the Landowner or community. All complaints will be acknowledged in writing by the CECO within 48 hours of record in the register, and the CECO shall inform the complainant of the process that will follow. All claims shall be handled immediately to ensure timeous rectification / payment by the responsible party.

Eskom shall be held liable for all unnecessary damage to the environment, both on and off-site. Where such damage is due to Contractor negligence or accidental damage will be a matter between Eskom and the Contractor. All matters with landowners and other third parties will be addressed directly by an Eskom representative, typically the CECO.

The standard Eskom site documentation shall be used to keep records on site. All documents shall be kept on site and be available for monitoring purposes. Site inspections by an Environmental Audit Team may require access to this documentation for auditing purposes. The documentation shall be signed by all parties to ensure that such documents are legal. Regular monitoring of site works by the ECO is imperative to ensure that all problems encountered are solved punctually and amicably. When the ECO is not available, the Contract Manager / Site Supervisor shall keep abreast of all works to ensure no problems arise.

3.3 Frequency and Content of Reporting

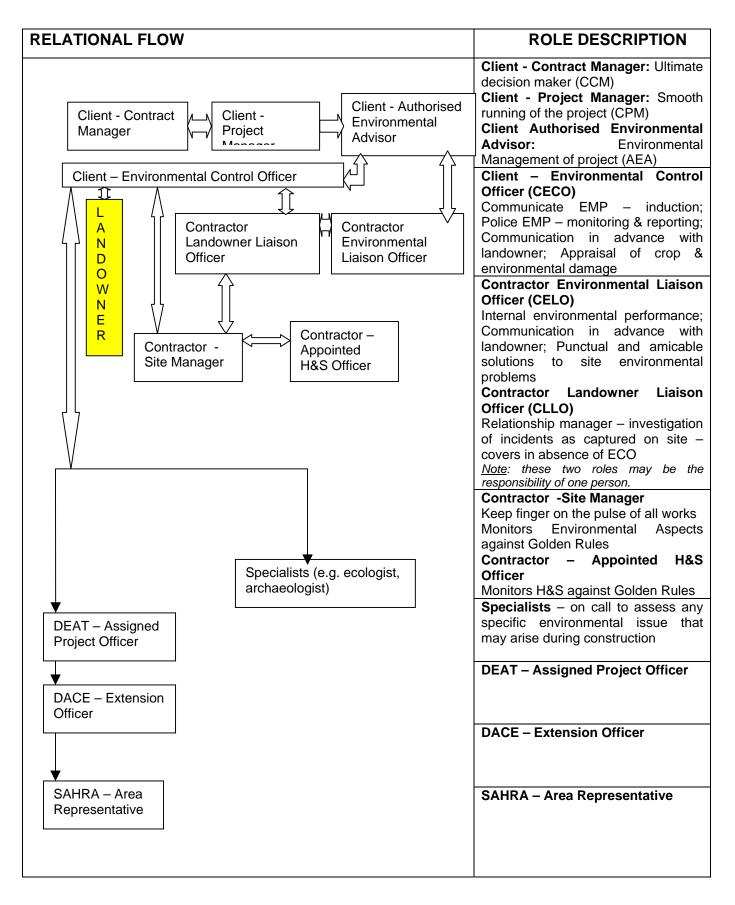
Two-weekly environmental compliance reports shall be forwarded to the Transmission Engineering Environmental Advisor (appointed per project) with all information relating to environmental matters. The following Key Performance Indicators must be reported on a twoweekly basis by the ECO:

- 1. Complaints received from affected parties and actions taken.
- 2. Environmental incidents, such as oil spills, etc. and actions taken.
- 3. Incidents possibly leading to litigation and legal contraventions.
- 4. Environmental damage that needs specialised rehabilitation measures to be taken.

The following documentation shall be kept on site by the CECO:

- 1. Site daily dairy
- 2. Complaints register
- 3. Records of all remediation/rehabilitation activities
- 4. Copies of bi-weekly reports to the Transmission Engineering Environmental Advisor for auditing purposes
- 5. Copy of the Environmental Management Programme
- 6. Minutes of site meetings including discussions on environmental issues

ORGANIZATIONAL PLAN: ROLES & REPONSIBILITIES FOR SUBSTATION/LINE CONSTRUCTON



This section conveys information relating to the identified aspects, their impacts and specific actions necessary and/or prompts to mitigate them. It is necessary and useful to site personnel involved with moment-by-moment decision-making too improve safety, health and environmental performance during the construction phase of the project.

4.1 Site establishment

4.1.1 Communication for success

Prior to the contractor moving on to site and establishing the construction camp a crucial meeting is required between the key role players, including Eskom Project Manager, Lead Contractor and CECO. The purpose of the meeting is induction of the key role players on SHE and their responsibilities for the duration of the construction phase of the project. It is the responsibility of the Project Manager and CECO to fully describe the project plan, including responsibilities, schedule and convey all information and answer questions relating to the identified aspects, their impacts and specific actions necessary and/or prompts to mitigate them.

In a meeting to follow this, It is envisaged that the key role players will meet with the landowner(s) to inform him/her/them of the project plan. All responsibilities will be clarified for the landowner(s), the project schedule and all relevant information will be conveyed to the landowner(s) and any questions answered. Contact details will be left with the landowner(s) or, as necessary, a copy of the EMP.

A third meeting with all site personnel including decision makers, CECO and Project Manager, Lead Contractor and subcontractors will be arranged for the purpose of a general induction of all contractor staff to the scope of the project and the workings of the SHE programme. This is where golden rules relevant for mitigation of site Health, Safety and Environmental Aspects will be set out. Most importantly all site contractor personnel's attention will be drawn to the site access plan where each aspect and its relevant mitigation measure and performance criteria highlighted. 4.1.2 Summary checklist of reasonable measures mitigating Impacts associated with site

establishment and relevant performance criteria

Impact	Mitigation measure	✓	Performance criteria 🔀	✓
Impact 1. Disruption to landowner activities and access due to overlap of use of facilities 2. Existing client facilities 3. Noise 4. Dust 5. Waste 6. Additional identified impact/s?	 Mitigation measure Agreement on which facilities for ablutions and which roads for access Agreement on responsible use of Eskom housing and ablution facilities if available Agreement on environmentally responsible use of water Agreement on mitigation of noise nuisance – when work will cease? Arrangements for dust from road traffic to be suppressed by regular application of drawn water – Not Municipal Water!!! Deliver chemical toilet to site prior to arrival of personnel Arrangement with either Landowner or registered Municipal Landfill for receipt of construction site waste Set-up Waste Bins – Paper, Plastic, Glass, Metal & parts, Rubber 		 Minutes of meetings Landowner, Contractor and CECO Landowner, Contractor and CECO & key staff members All site personnel including decision makers, the Landowner, CECO and Project Manager Confirmation of Receipt of induction signed by all project personnel – Landowner, Construction Site Manager, CECO and all construction site staff Agreements on facility and road-use and condition signed by landowner and client and filed for reference under section Project Landowner/Client Agreements Records of disposal of hazardous waste including defunct electrical equipment Observed evidence of orderly approach and set-up of all amenities before main workforce arrives on 	

Site establishment shall take place in an orderly manner and all amenities shall be installed before the main workforce move onto site. A method statement is required from the Contractor at tender stage that includes the layout of the camp, management of ablution facilities and wastewater management.

The Contractor camp shall have the necessary ablution facilities with chemical toilets where such facilities are not available at commencement of construction. The Contractor shall supply a wastewater management system that will comply with legal requirements and be acceptable to Eskom. Where Eskom facilities are available the Contractor shall make use of such facilities where it is viable and possible. The Contractor shall inform all site staff to the use of supplied ablution facilities and under no circumstances shall indiscriminate excretion and urinating be allowed other than in supplied facilities. The Contractor shall supply waste collection bins where such is not available and all solid waste collected shall be disposed of at a registered waste dump. A certificate of disposal shall be obtained by the Contractor and kept on file.

Where a registered waste site is not available close to the construction site, the Contractor shall provide a method statement with regard to waste management. Under no circumstances may solid waste be burned on site unless a suitable incinerator is available.

4.1.3 Golden Rules

1. Does everyone know?

• Has the site access plan been communicated fully – do's and don'ts

2. Housekeeping

• Aspects – Waste including sewage reticulation, Dust & Noise

4.1.4 Monitoring

Monitoring will be performed by the CECO against the performance criteria listed in the table above. The CECO will be present throughout the site establishment period as this is a critical period in which compliance against the Safety, Health and Environmental Management Programme is initiated. The CECO will take photographs of any non-compliance and have the situation rectified immediately with assistance from the Contractor Site Manager.

4.2 Health and Safety

4.2.1 **Communication for success**

It should be recognised that above all, valuing human life and prevention of injury is key to the success of the project. If ecosystem health is the sustainable integration of social, environmental and economic agendas then ensuring the safety of all project personnel should be the starting point of all development projects.

It is strongly recommended that the approach to enforcement of Health and Safety on site is behavioural based. This means that it is incumbent on all site personnel – those with and without rank, to draw each other's attention to the safety of each and every operational task entered into at the construction site. A very good idea, if no Best Practice Description is on hand is to hold group risk assessment prior to the operation – this type of assessment should involve the Site Construction Manager and the Appointed Health and Safety Officer. In addition, the CECO should add-value from and Environmental perspective.

It is recommended that an every-day spoken term be used to draw attention to the type of attitude and behaviour demanded on site that will relate to successful H&S performance. The term "Sharp-sharp" denotes being awake and aware – it is an endearment of all site personnel to each other for their responsibility and commitment to upholding the requirements of Health & Safety on and off site. The term should be used to summarize the following:

Sharp-sharp

- Behavioural based Health & Safety
- Zero Tolerance Target Zero no incidents or accidents do not pass an unsafe situation without alerting/warning those involved
- SHE is Everybody's business
- Site/task based risk assessments and record thereof, prior to implementation involving Contractor Site Manager, Contractor Health & Safety Officer and Environmental Control Officer
- Record in writing and file H&S file available on site

Health & Safety and relevant performance criteria

Im	pact	Mitigation measure	Performance criteria
1.	Accidents/down time due to lack	 ✓ Proof of valid current workman compensation insurance 	✓ Copies of emergency procedures:
2.	of diligence Accidents/down	✓ Identify roles & responsibilities	Fire hazardLightning
0	time due to lack of training	 ✓ Identify line of communication – record of appointment of site H&S Officer as required by the 	 Snake bite ✓ Medical emergency
3.	Accidents due to poor/lack of	Health & Safety Act	✓ Current certificated proof of First Aid trained
	machinery and equipment maintenance	✓ Have and make available site access plan	staff and availability ✓ Signed proof of
4.	No record of correct	✓ Work flow plan	appointment of H&S Officer
	procedure of operating	✓ Health & Safety Policy	✓ Record of weekly H&S meeting minutes
5	instruction Lack of	 ✓ Site specific SHE plan ✓ Emergency plan for accident 	 ✓ Record of near- miss/incidents &
υ.	responsibility, policing and	and injury	accidents └─ ✓ PPE* inventory and ┌─
6.	record keeping Use	 ✓ H&S Golden Rules ✓ Induction plan and procedure 	under lock and key └── ✓ Record of safe └──
•	behavioural based	 ✓ Induction plan and procedure ✓ Toolbox/green area meetings 	equipment/machinery by technical inspector
	approach to positively	✓ Record near- miss/incidents/accidents	✓ Sign-off on H&S Golden Rules by all site
	influence landowner and	✓ Minute Toolbox/green area	 personnel ✓ Proof of operator competence and training
7	landowner personnel Lack of	meetings ↓ ↓ ↓ ↓ ↓ ↓ ↓ ↓ ↓ ↓ ↓ ↓ ↓ ↓ ↓ ↓ ↓ ↓ ↓	 ✓ Proof of drivers licenses ✓ Proof of knowledge of
	reminders Lack of	✓ PPE use and storage	H&S Golden Rules by site personnel
-	adequate rest Lack of	✓ Task specific risk secific	✓ Correct storage of hazardous chemicals
	thorough checks by technical	✓ Equipment and Machinery manufacturer operating procedures	and fuels ✓ Correct Safety signage ✓ H&S file available on site
10	personnel Additional identified	✓ Task/best practice descriptions	(*Personal Protection Equipment)
	impact/s?	✓ Trained operators and proof thereof	
		✓ Communication of H&S Golden Rules	
		✓ Housekeeping	
		✓ Medical fitness and identification records	
		✓ Correct & visible signage	

4.2.3 Golden Rules

1. Working at heights

- Scaffold plan and inspection records
- Trained operators, PPE (Personal Protection Equipment) including approved harnesses and roping

2. Lockout/Machinery isolation

- In an emergency how does is the equipment/machinery shut down?
- Proof of equipment/machinery maintenance schedules
- Proof of compliant electrical installations

3. Hazardous substances

- Keep record of Material Safety Data Sheets (MSDS) for all hazardous chemicals used on site
- Store in isolated, bunded and ventilated structure

4. Fire

- What is the emergency procedure in the even of wild fire?
- How will the construction site be safely evacuated?

5. Lightning

- Cease work and find shelter in vehicle/s or roofed cover keep way from tall metal structures
- Lie flat on the ground if at a distance from suitable cover

6. Emergency procedures

- Medical Emergency First Aid Response, Emergency Service Response
- What to do in the event of snake bite emergency procedure for medical emergencies
- Visibility Compulsory wearing of safety vests and hard hats on site
- What arrangements are in place protecting operators from drowning if attending to equipment to temporarily draw water from dams and/or rivers?

7. PPE

- Inventory of all necessary PPE relating to the scope of works of the project
- Record of audits of PPE
- Hard hats, safety boots, cotton overalls, safety glasses, ear protection, disposable dust masks, safety vests and that relevant for safe operation or assembly of equipment

8. No liquor/drugs on site and no working under the influence

 No liquor will be allowed on site during and after hours. Functions where liquor is allowed will be conducted off site and in with permission of the necessary decision maker.

The workforce shall also be sensitised to the effects of sexually transmitted diseases, especially AIDS. General health issues shall be brought under the attention of the site staff and condoms shall be supplied on site.

4.2.4 Workshop and Equipment Storage Areas

Where possible and practical all maintenance of vehicles and equipment shall take place in a workshop area. During servicing of vehicles or equipment, a suitable drip tray shall be used to prevent carbon spills onto the soil, especially where emergency repairs are conducted outside the workshop area. Leaking equipment shall be repaired immediately or be removed from site to facilitate repair. All potentially hazardous and non-degradable waste shall be collected and removed to a registered waste site.

Workshop areas shall be monitored for oil and fuel spills and such spills shall be cleaned and remediated to the satisfaction of the ECO. To this end a method statement is required from the Contractors, tendering for the project, to show procedures for dealing with possible emergencies that can occur, such as fire and accidental leaks and spillage. The Contractor / Regional staff shall be in possession of an emergency spill kit that must be complete and available at all times on site.

The following shall apply:

- All contaminated soil / yard stone shall be removed and be placed in containers. Contaminated material can be taken to one central point where bio-remediation can be done.
- Smaller spills can be treated on site.
- A specialist Contractor shall be used for the bio-remediation of contaminated soil where the required remediation material is not available on site.
- All spills of hazardous substances must be reported to the appointed Transmission Engineering Environmental Advisor or alternatively to the Regional Environmental Advisor (Tx Key Performance Indicator requirement).

4.2.5 **Storage of hazardous substances**

All hazardous substances shall be stored in suitable containers and storage areas shall be bunded and security controlled. This includes all carbon substances like fuel and oil as well as herbicides and battery acid. **The bunded volume should be sufficient to contain the full volume of stored hazardous substance + 20%.** A register shall be kept on all substances and be available for inspection at all times. Areas shall be monitored for spills and any spills shall be contained, cleaned and rehabilitated immediately. Any leaking containers shall be repaired or removed from site (See above for actions after spills).

Storage areas shall display the required safety signs depicting "No smoking", "No naked lights" and "Danger". Containers shall be clearly marked to indicate contents as well as safety requirements.

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The contractor shall supply a method statement for the storage of hazardous materials at tender stage.

4.2.6 Monitoring

In this case, the Contractor Site Manager and Appointed Health and Safety Officer shall check that personnel are using the appropriate PPE. Furthermore, prior to commencement of any construction activity they shall lead personnel in considering all H&S risks associated with the intended activity. Operation of equipment will be measured against manufacturer operating procedure. Any unsafe situation shall be halted immediately and safe measures instigated. A written record will be kept of any unsafe situation, incident or accident and reported on a monthly basis.

4.3 Security

4.3.1 Communication for success

It is strongly recommended that the contractor make a firm commitment to working closely with the landowner/district existing security network. Such network may take the form of a community policing initiative, services of a local security company or involvement of the local police department. The contractor must not only take responsibility for his own personnel's movement on site, but for any unidentified persons accessing the site/s where construction is progressing.

It is in the hands of the contractor to engage with the landowner on the issue of security, find out the landowners requirements and ensure that that those are kept. The Contractor Landowner Liaison Officer (CLLO) and Site Contractor Manager are responsible for establishing and maintaining construction site security in accordance with the wishes of the Landowner. 4.3.2 Summary checklist of reasonable measures mitigating Impacts associated with Security and relevant performance criteria

Impact	Mitigation measure 🔀	✓	Performance criteria 🔀	✓
1. Theft, damage to property and injury, loss of life	 ✓ Administer strict controls via key personnel 		 Proof of security procedures covering issues including: 	
2. Lack of control - break down in local security and	 ✓ Identify line of communication 		 Gates & Key Responsibility Emergency 	
compromising of project deadline through delays	 ✓ Have and make available site access plan 		response contact numbers	
3. Additional identified impact/s?	✓ Site personnel identification register, patrols and records of		 Guard placement and duty 	
	incidence ✓ Landowner agreements		description o Full inventory	
	and written permission ✓ Establish responsibilities in		of site equipment and machinery	
	existing local networks and extend coverage to include project		including vehicles and registrations	
	requirements ✓ Site register, patrols and records of all site		 ✓ Confirmation of Receipt of induction relating to security 	
	personnel ✓ Emergency procedures		procedures signed by CLLO & Construction Site Manager	
	✓ Substance abuse		 Documentation of proof of receipt of landowner gate keys 	

4.3.3 Golden Rules

1. Emergency Procedures

• What to do in the event of suspicion, an accosting, break-in or theft – an emergency procedure must detail how such situations should be handled within the context of the locality of the construction site.

2. Landowner agreements and written permission

- Access?
- Movement of vehicles and personnel?
- Afterhours movements?
- Area for recreation?

3. Administer strict controls via key personnel

- Who keeps sets of keys?
- Who keeps a register of equipment and personnel?

4. Carry Identification

 The contractor shall have on record and available on site the identities of all construction staff.

4.3.4 Monitoring

Close liaison will take place between the Contractor and the Landowner on this issue. It is incumbent on the Contractor – whilst on site, to be the eyes and ears of the landowner and to report any suspicious activity directly to the landowner or the nominated security service provider.

After hours the construction site camp is to be padlocked and no personnel will be allowed to be on site at this time. The contractor should make arrangements to post a guard or have the security service provider undertake regular patrols to the site.

The contractor shall keep a record of his duty to be responsible for any keys that belong to access gates through which access is allowed by the landowner.

4.4 Access

4.4.1 Communication for success

It is evident that the construction site is isolated. Thus, the Site Contractor Manager must make provision for emergency in the event of a delivery vehicle getting lost. It is incumbent on the contractor to inform those making deliveries how to get to the site. Critical will be ensuring that deliveries do not arrive after hours (17.00hrs) – such events are known to be nuisance incidents and if not managed can impact negatively on the client/landowner relationship.

In addition, roads that approach the site are all gravel/dirt and thus susceptible to deterioration, especially during the wet season and through repeated use by heavy vehicle traffic. Direct access to the expansion site will be via the existing dirt road. This road is seen to be in reasonable condition though in poor weather and under heavy usage conditions may become difficult, particularly for heavy articulated vehicles. Erosion it appears should be negligible. However, vehicles getting stuck in the sand and mud are seen to areas for pre-emptive management action. Consideration must be given by the contractor to an emergency procedure for assisting vehicles that have become stuck as a result of poor weather and road conditions.

Permits for the transport of extra heavy goods on public roads are the responsibility of the Contractor to arrange, or as agreed with the Eskom Project Manager.

4.4.2 Summary checklist of reasonable measures mitigating Impacts associated with gaining access to the construction site via landowner property and relevant performance criteria

Impact	Mitigation measure	✓	Performance criteria
 Deterioration in condition of existing roads Security/speed breach Additional identified impact/s? 	 Landowner agreements and written permission Have and make available site access plan Use clear signage Emergency procedures for road deterioration e.g. flooding etc. As far as possible carry out heavy construction during the dry season Keep to normal working hours viz. Monday to Friday, Saturday till 1300hrs Set speed limit 		 Copy of landowner/client agreement on how the contractor is to travel and gain access to the site construction camp Availability of vehicle/tractor for towing in case of emergency Road maintenance equipment such as tractor drawn scraper and roller or agreement by landowner to regularly maintain the road surface quality and road drainage Adherence to the speed limit (40Km/hr) Agreement on condition of access road/s before and after construction based on photographic evidence No claims from Landowners due to damage on existing access roads No erosion visible on access roads No loss of topsoil due to runoff water on access roads No interference with the natural flow of water No damage to fences and subsequent complaints from Landowners All gates kept locked at all times to limit access to construction staff

4.4.3 Golden Rules

1. Landowner agreements and written permission

- Access through cultivated lands.
- After completion ripping to alleviate compaction
- The movement of vehicles during times of the week and day e.g. no deliveries to site on the weekends or after hours
- Use of landowner equipment and vehicles
- Speed limit

2. Emergency procedures

 Who will respond when/if a vehicle gets stuck – the farmers tractor to pull out the lowbed delivering tower structures?

3. Speed Limit

• Generally a speed limit of no greater than 40km per hour should be imposed

4. Gated and locked

- All access route gates will be closed after access
- The construction site camp should be gated and locked after hours

4.4.4 Access planning and design

Planning of access routes to the site for construction purposes shall be done in conjunction with the Contractor, Eskom and the Landowner. All agreements reached should be documented and no verbal agreements should be made. The **normal Eskom site documentation** will be sufficient for this purpose. The Contractor shall properly mark all access roads. Roads not used shall be marked with a "**NO ENTRY** " sign.

Where new access roads are constructed, this must be done according to **design and contract specifications**. Drainage channels shall be suitably designed to ensure erosion does not occur, especially at the outflows. The new access road shall be designed to allow for the natural flow of water where required. Crossing of dongas and eroded areas on access routes to new substation sites shall be thoroughly planned and installed according to design and contract specifications. All areas susceptible to erosion shall be protected with suitable erosion control measures from the onset of the project. Prevention is the total aim as restoration is normally very difficult and costly.

The crossing of rivers, streams or wetlands is subject to the necessary permit from the Department of Water Affairs and Forestry. This will include any works to river or steam banks.

Where necessary suitable measures shall be taken to rehabilitate damaged areas next to the newly constructed road (See section 3.7 for recommendations).

4.4.5 **Construction Site Fencing Requirements**

The site shall be fenced to prevent any loss or injury to persons or livestock during the construction phase. All Eskom gates shall be fitted with locks and be kept locked at all times during the construction phase, especially when works are stopped during weekends and holidays. All claims arising from gates left open shall be investigated and if at fault, settled in full by Eskom. Any claims from the Contractor will be between Eskom and the Contractor. If any fencing interferes with the construction process, such fencing shall be deviated until construction is completed. The deviation of fences shall be negotiated and agreed with the landowner in writing.

It is expected that the construction working area will need to be no wider than 5m beyond the final security fence line around the substation. Hence there should be no damage to property or the environment beyond this point. It is recommended this area be marked off with red and white bunting (tape) at the start of construction. Should there be a need to go beyond this area (eg for temporary spoil or topsoil storage), the requirement should be first approved by the CECO who will look for a suitable site.

4.4.6 Monitoring

Access to the construction site will be monitored against the site access plan. Alternate access will not be tolerated and fines imposed on the Contractor Site Manager by the CECO where the rules are breached.

4.5 Fire Hazard

4.5.1 **Communication for success**

Wild fire is major contributor to power outages throughout the country. In conjunction with a countrywide initiative to reduce the risk of wild fires and their negative impact on electricity assets as well as the wider impacts affecting commerce and the public associated with wild fire induced outages, the opportunity exists to involve landowners in the management of fire risk. According to the Veld & Forestry Act it is incumbent on landowners to protect their own land from the threat of wild fire through applying fire management tools such as burning of firebreaks. Furthermore, as a landowner is liable for damages due to fire emanating from his property, it is highly advisable that landowners form organized communities to deal with wildfire on an ongoing basis. Fire protection Associations must be formed and landowners organized to facilitate the protection of property from wild fire threat.

Similarly, as the owner of the substation site, Eskom will be responsible for any fires originating from the site, or fires due to contractor's negligence. Eskom will ensure the Contractor adheres to a strict no smoking policy during construction. Additionally, no cooking fires should be lit and any

potential fire hazard activities (eg arc welding) should be carefully managed. The Contractor should hold fire-fighting equipment on site during the construction phase.

The nub of the mitigation for this particular environmental aspect is that the contractor must engage the landowner on procedure for handling wildfire threat. In addition, the contractor must engage and network with the local fire protection officer and abide by the protocol set out by the Act.

Impact	Mitigation measure 🔀	✓	Performance criteria
 Loss of economic benefit – livestock/grazing production Damage to property and risk of loss of life Project delays – especially during fire season Power outages and associated 	 ✓ Identify roles & responsibilities ✓ Emergency plan ✓ Accredited training in fire fighting ✓ Properly maintained equipment ✓ Readiness ✓ Fire management programme to protect the asset from damage ✓ Safe berbieide use 		 No veld fires started by the Contractor's work force No claims from Landowners for damages due to veld fires No litigation Proof of certification in basic fire fighting of at least 5 staff members
and associated negative economic knock- on 5. Opportunity to network to facilitate maintenance of asset once substation/line is commissioned 6. Additional identified impact/s?	 ✓ Safe herbicide use ✓ Monitoring 		 Necessary serviced and ready fire fighting equipment including: Water tanker, tank and fire fighting hose Backpack sprayers Torch PPE Availability of contact details for local fire officer Evidence of fire protection as recommended by the CECO e.g. mowing or firebreaks

4.5.2	Summary checklist of reasonable measures mitigating Impacts associated with Fire
	Hazard and relevant performance criteria

4.5.3 Golden Rules

1. Landowner Agreement

- Engage with the landowner specifically on his procedure for managing wild fires
- Fit-in with the requirements of the local Fire Association following protocol with respect training, equipment to adhering to procedure for management burns.
- Fire management programme

2. Identify roles & responsibilities

 Especially during fire season, ensure that equipment is ready and trained personnel can man equipment in the case of a wild fire emergency – consider roster system for off-duty days.

3. Fire management programme

• Engage with the landowner regarding a suitable time to burn firebreaks to protect the construction site camp and eventually the entire substation from wild fire threat.

4. Safe herbicide use

• Ensure that a trained operator applies tracer lines, that herbicide application information is captured and that the hazardous chemical is stored in the hazardous chemical store.

5. Health & Safety

- Cotton overalls
- Fire resistant boot soles
- Calibrated herbicide applicator
- Rubber gloves
- Goggles
- Fume mask

6. No open fires shall be allowed on site

 Under no circumstance (The Forest Act, No 122 of 1984) are fires to be lit on site. All cooking shall be done with gas in demarcated areas that are safe and cannot cause runaway fires. The Contractor shall have operational fire-fighting equipment available on site, especially during the winter months.

4.5.4 Monitoring

The CECO will check to ensure that emergency plans are in place and if not facilitate relationships such that assets are protected. If the contractor is to use fire as a tool to protect assets, the CECO will ensure that the personnel involved have received the necessary recognized training in basic fire fighting skills. Furthermore, that the necessary network is place including contact established with the local Fire Protection Officer and/or agreement with the landowner to handle the aspect of fire hazard and protection.

4.6 Waste & Housekeeping

4.6.1 **Communication for success**

The Contractor shall dispose of all excess material on site in an appropriate manner and at a registered landfill. The CECO is to police the general cleanliness of the site and raise and housekeeping and waste management issues at weekly Health, Safety and Environment meetings where non-compliance will be raised and instructions given through the Contractor Site Manager.

All packaging material shall be removed from site and disposed of and not burned on site. A negotiated landfill may be used but when it is closed up, the rubble shall be compacted and there shall be at least 1m of soil covering the waste material. No landfill may be used without the consent from the Landowner. No non-biodegradable materials shall be disposed of in any unregistered waste site unless it is inert (eg soil, rubble, etc.). A method statement regarding management and disposal of construction rubble shall be included in the tender documents by the Contractor.

No material shall be left on site that may harm man or animals. Broken, damaged and unused spares such as porcelain, glass, nuts, bolts and washers shall be picked up and removed from site. Surplus concrete may not be dumped indiscriminately on site, but shall be removed from site and disposed of in registered landfill areas. Concrete trucks shall not be washed on site after depositing concrete into foundations. Any spilled concrete shall be cleaned up immediately. It strongly suggested that all mixing be carried out on shuttering and never directly on the soil surface.

Impact	Mitigation measure 🔀	~	Performance criteria 🔀	✓
 General contamination Unsightliness Risk of litigation Additional identified impact/s? 	 ✓ Use environmentally sound disposal facility ✓ Communicate the need for housekeeping and a neat and tidy work environment ✓ Link Housekeeping with Health & Safety Awareness 		 No construction rubble left lying around on site Hand mixing to be carried out on metal shuttering Unused mixed concrete to be disposed of off site No incidents of litigation No complaints from Landowners Recycling to be actively practiced including – oil & grease, metal parts, rubber, paper, plastic & glass A clean well kept site with everything in its place A vailability and proof of training for use of spill kits Necessary bunding and storage facilities for fuels and hazardous chemicals Emergency procedure for spill Register of disposals at registered site if used 	

4.6.2 Summary checklist of reasonable measures mitigating Impacts associated with waste and general housekeeping and relevant performance criteria

4.6.3 Golden Rules

1 Housekeeping

- Keep the working area tidy
- Collect all waste on a daily basis
- Provide safe storage bins at key locations to facilitate easy waste collection

2. Environmentally sound disposal

- Protect against rain and wind dispersal of waste
- Empty waste collection areas weekly
- Dispose of all waste at registered waste disposal sites
- Hydrocarbons and hazardous materials need to be disposed of at registered sites

3. Recycling

- Recycle material where possible within the construction process
- Investigate recycling collection centres in local municipalities

4.6.4 Monitoring

Daily evidence of a neatly kept construction site as well as presence of disposal bins for recycling is sought. Records of disposal at registered site are to be kept and will be checked by the CECO.

4.7 Water resources

4.7.1 **Communication for success**

Eskom must ensure that the Contractor, through enforcement by the Contractor Site Manager and monitoring, feedback and reporting by the CECO, will protect water resources in the immediate vicinity of the site.

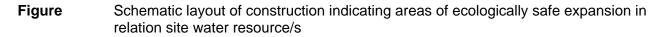
The substation expansion site borders an upland wetland area. The ecological impact may be significant, particularly on the lower lying areas close to the wetland system on the west of the study area. Mitigations on midslope or wetland ecotone areas are necessary to allow natural underground seepage towards the drainage lines. If it requires construction to be closer than 100m to the wetland the ecological impact would be higher. Wetland delineation is required before construction starts, and where the wetland may be impacted, a water use permit will be required from the Department of Water Affairs and Forestry (DWAF).

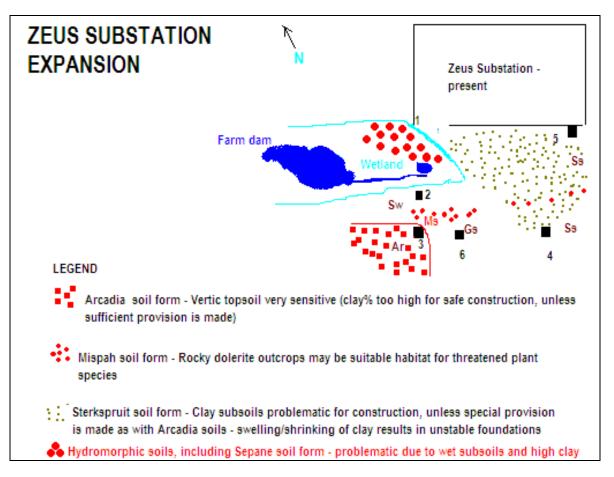
Location of fuel storage areas, hazardous materials (oils, chemicals, cement), concrete batching plants, washing areas, waste storage areas, ablution and latrine areas, and any other potentially polluting activities, should be at least 100m away from the wetland or stream. These areas should have drainage management features that will prevent polluted runoff entering the natural 323_Zeus_21-08-07_v4 PBAI (SA)

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watercourse. Such features will include bunding (or berms) placed around hazardous liquid and fuel storage areas, settlement ponds below any washing areas or batch plants, etc., and it is recommended they have sufficient capacity to contain the 1-hour, 1 in 10year point rainfall event. All these facilities should have controlled access to limit the risk of accidental spillage.

Final design of substation drainage layout to be reviewed in the light of pollution risk and mitigation measures once the design has been done.





4.7.2 Summary checklist of reasonable measures mitigating Impacts associated with Water and relevant performance criteria

	evant performance criteria		
mpact	Mitigation measure	Performance criteria	V
 Impact Water quality Biodiversity Drainage/soil erosivity Quality for Human consumption and Agricultural use Additional identified impact/s? 	Mitigation measure ✓ ✓ Meeting requirements of DWAF regarding water usage ✓ Landowner agreement on use of water ✓ Landowner agreement on use of water	 ✓ Performance criteria ✓ Landowner agreement for drawing of water including position ✓ License for drawing of water ✓ Dry toilet – regular maintenance ✓ Correct storage of hazardous chemicals and fuels – sealed and bunded ✓ Correct site drainage – no evidence of erosion or poor drainage ✓ Monitored/recorded use of herbicides by trained personnel ✓ Spill emergency plan ✓ Evidence of waste management implementation and recycling ✓ No damage to natural drainage channels ✓ No damage to river and stream banks ✓ No visible erosion once construction is completed ✓ Evidence of drainage safe vehicle and machinery service area – use of drip trays ✓ No evidence of 	

4.7.3 Golden Rules

1. Legislative Requirements and Landowner Agreements

- Does the landowner have riparian rights is water use registered?
- If necessary, from where will water be drawn?
- Where will waste be disposed of?

2. Storage of hazardous chemicals, fuel, and location of ablution and latrine areas

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- A fuel and hazardous chemical depot will be established with correct bunding, labelling and signage.
- Storage areas should be a minimum of 100m from the wetland edge or drainage lines.
- Storage areas should be secured against uncontrolled access.

3. Emergency Plan

• Trained personnel will know how to and have necessary equipment and materials to respond to a fuel or chemical spill into a local water resource.

4. Proper Waste Disposal

• Ensure disposal of potentially hazardous materials, and liquids in particular, at registered disposal sites.

5. Drainage

• Designed to protect water resource/s from contamination by silt and or contaminant emanating from the construction site

4.7.4 Ecological Survey (See Appendix for complete report)

4.7.4.1 **Construction camp position in relation to water resource** (Refer figure on construction site layout in relation to water resource/s above)

The construction camp may be located anywhere except within 100m from the wetland areas. Any permanent structures (if applicable) need to take into account the high clay. A dry toilet system is recommended due to the poor drainage. Green water discharge should be monitored and controlled. The following points should be taken into account in the location of a construction camp at Zeus:

- A farm dam is situated in close proximity west of the study area.
- A new road is currently in construction south and adjacent to the study area.

4.7.4.2 Potential water point

There is a farm dam in the area adjacent to the development site (330m from survey point 3), presently used to provide water to the cattle grazing in the area. The quantity of water required or available for both cattle and human consumption was not investigated in this study. Water for construction should not be drawn from this dam without further investigation and obtaining any necessary permits.

4.7.4.3 Access road

The existing access road will be used for construction and for future access to the substation. This road should be monitored for damage and deterioration during construction.

4.7.4.4 Site Drainage

Under no circumstances shall the contractor interfere with any watercourses in the vicinity of the site. Should deviation of such watercourses be required as part of the contract design specification, the specifications shall be adhered to strictly. The Environmental Control Officer shall ensure that all watercourses are adequately protected to prevent downstream silting due to erosion on site. Rubble from the construction process shall be removed from site and may under no circumstances be dumped into any natural drainage channels. The normal flow of runoff water must not be impeded, as this will enhance erosion.

Substation drainage needs to consider local wetland conditions during detailed design stage, especially where pollutant loads from accidental spillages within the substation may enter the drainage network. A system of shut off valves and internal storage chambers needs to be provided within the substation drainage system to contain any pollutant loads for later safe disposal.

This should be reviewed once the wetland delineation exercise has been completed.

4.7.5 Monitoring

The CECO is to monitor for chemical contamination against the SABS standards for Human Consumption and Agricultural Use. An accredited laboratory will be used to test water samples that are drawn prior to site establishment as a benchmark and subsequently on a monthly basis. In particular e-coli, ammonia and suspended solids should be tested. Samples will be drawn from the same position at the water resource under threat. A final sample will be drawn post site disestablishment. Sample analyses results will be compared against initial benchmark samples.

The wetland delineation exercise will guide further monitoring requirements.

4.8 Soil

4.8.1 **Communication for success**

As with water, the responsibility for site soil protection rests with the Contractor Site Manager and monitoring, feedback and reporting by the CECO will ensure site soil are protected.

The ecological impact envisaged is high on most parts, but higher on lower lying areas close to the wetland system on the west of the study area. The largest impact envisaged is the disturbance of topsoil dominated by Red Grass. Specific recommendations include the removal of topsoil with Red Grass intact and to prevent any cover on Red Grass dominated grassland during construction. Mitigations on midslope or wetland ecotone areas are necessary to allow natural underground

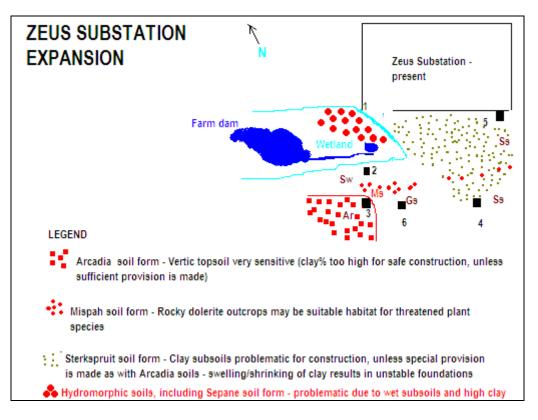
seepage towards the drainage lines. If it requires construction to be closer than 100m to the wetland the ecological impact would be higher. It is recommended, as a safe ecological alternative, that the construction plan then includes an extension to areas further east instead.

Soils are high in clay, with the extreme of >55% clay on the topsoil in the southwestern part of the study area. Clay of > 50% underlay the topsoil of the flatter area on the crest. Sufficient provision should be made with construction on these areas to take into account the movement of clay as result of its swelling / shrinking between dry and wet seasons.

Design of the substation drainage needs to take into account soil conditions immediately around the site. Unattenuated storm flows from the substation may result in erosion gulleys forming downstream of the site(See 4.7.4.4 above).

Figure

Schematic layout of construction site indicating areas of ecologically safe expansion in relation to soil (drawing not to scale)



4.8.2 Summary checklist of reasonable measures mitigating Impacts associated with Soil and relevant performance criteria

Impact	Mitigation measure	✓	Performance criteria	✓
 Soil contamination Export of soil resource Additional identified impact/s? 	 Landowner agreements borrow pits, environmentally safe disposal of waste Use clear signage Designated area trapping oil and grease for service and maintenance of vehicles, machinery and equipment Sealed and bunded fuel and hazardous chemical storage areas Trained personnel Emergency procedure for spills Monitoring against standards for environmentally safe agricultural soils if contamination occurs Environmentally sound disposal of waste including recycling and use of registered landfill sites where possible Use of danger tape to cordon-off areas of high erosivity Portable toilet facilities 		 No evidence of soil erosion or contamination Evidence of properly designed and engineered drainage Correct location of roads according to recommendations No visible erosion scars once construction is completed All disturbed areas successfully rehabilitated 	

4.8.3 Golden Rules

1. Landowner agreements

- Agreement and access to proper disposal facilities either controlled by landowner or use of registered waste disposal site.
- Agreement and access to borrowed soil for construction purposes.

2. Emergency Procedures & Training

- Provision of spill kits near fuel and potentially hazardous liquid storage areas within the construction camp.
- Personnel trained in the proper use of spill kit.

3. Housekeeping

All domestic waste must be disposed of in pre-agreed areas that either make use of correct landowner disposal facilities or registered facilities offsite. At the very least waste must be disposed into bins marked plastics, glass, metal/machinery parts and paper. Servicing, greasing of vehicles and machinery must take place at a designated safe area where there is little or no risk of contaminant entering the sites natural drainage.

4. Signage

 Areas for storage of hazardous chemicals, fuels and areas for servicing and maintenance of equipment and vehicles must be clearly sign posted (an indication of signage advised is addressed in the section under site Health & Safety).

4.8.4 **Ecological Survey Report** (See appendix for complete report)

4.8.4.1 **Description of site soils** (Refer figure on construction site layout in relation to soil resource above)

Soils are of high clay content on the flat crest area south of the substation. The Sterkspruit soil form is dominant closer to the present substation in the northeast. In this area 250 mm deep sandy clay Orthic topsoil is underlain by clay prismacutanic subsoil. Rocky dolerite areas intrude the crest at isolated areas. Immediately adjacent to the rocky areas the sandy clay topsoil is underlain by clay lithocutanic rock, the subsoil partly weathered to a depth of 300 mm (Glenrosa form). Further away from the rocky areas the topsoil is underlain by a 450 mm deep clay pedocutanic horizon and a deeper saprolite layer (Swartland form).

On the present south-western corner, next to the security fence, the soil is moist and clayey (represented by the Sepane soil form). Wetland conditions extend 180 m into the area from the west. Hydromorphic soils are present on the valley bottom. Further downstream, and outside of the site, a small dam is present within this wetland.

On the crests of the south-western part of the development area the soils are very sensitive. Vertic black clay soils are present (Arcadia form) in the southwestern corner and underlay the newly constructed road. The crest-midslope ecotone is rocky and shallow dolerite outcrops are present (Mispah soil form). To the east of the rocky outcrop the soils are partly weathered and lithocutanic clays 300 mm deep. The midslope between the rocky outcrop and the wetland is underlain by Swartland soils.

4.8.4.2 **Construction camp position in relation to soil resource** (Refer figure on construction site layout in relation to soil resource above)

The construction camp may be located anywhere except within 100m from the wetland areas. Any permanent structures (if applicable) need to take into account the high clay. A dry toilet system is recommended due to the poor drainage. Green water discharge should be monitored and controlled. The following points should be taken into account in the location of a construction camp at Zeus:

- A farm dam is situated in close proximity west of the study area.
- A new road is currently in construction south and adjacent to the study area.

Location of the construction camp should be reviewed after completion of the wetland delineation exercise.

4.8.4.3 Access road in relation to soils

The existing access road to substation will be used for the substation expansion. Where rehabilitation of the existing access road may be required, sufficient provision should be made for water drainage away from the road. Clay should be removed to the depth of saprolite and be replaced with suitable road-filling material.

4.8.4.4 Sewage Reticulation

A dry toilet system is recommended due to the poor drainage and risk of polluting the wetland area. Green water discharge should be monitored and controlled. Latrine facilities should be situated at least 100m away from the edge of the wetland (review after wetland delineation exercise is complete).

4.8.4.5 Soil Conservation

Where terracing is required, topsoil shall be collected and retained for the purpose of re-use later to rehabilitate disturbed areas not covered by yard stone. Such areas include terrace embankments and areas outside the high voltage yards. Where required, all sloped areas shall be re-vegetated and stabilised to ensure proper rehabilitation is effected. These areas can be stabilised using design structures or vegetation as specified in the design to prevent erosion of steep embankments. The contract design specifications and Environmental Impact Report (EIR) recommendations shall be adhered to and implemented strictly.

The retained topsoil shall be spread evenly over areas to be rehabilitated and suitably compacted to effect re-vegetation of such areas to prevent erosion. Where required re-vegetation can also be enhanced using a grass seed mixture as described in section 3.7 below.

4.8.5 Monitoring

The site needs to be continuously monitored for accidental spillages, uncontrolled discharges and erosion due to stormwater runoff. In the event of a spill the contaminated area should be contained to prevent the spread of pollutant. Dependent on the pollutant, the contaminated soil may need to be removed and disposed of off-site, proof of disposal obtained and the area rehabilitated/revegetated using borrowed soil.

All spillages, but particularly those near the wetland area need to be inspected and recorded by the CECO, including photographic record and remediation measures.

4.9 Flora

4.9.1 Communication for success

Responsibility for protection of site flora is in the hands of the Site Construction Manager and CECO.

The ecological impact envisaged is moderate to high on most parts, but higher on lower lying areas close to the wetland system on the west of the study area. The largest impact envisaged is the disturbance of topsoil dominated by Red Grass, an important grassland species in South Africa. It is therefore important that the area of construction impact is limited to not more than 5m beyond the final security fence boundary (see 4.4.5 above). Specific recommendations include the removal of topsoil with Red Grass intact and to prevent any cover of remaining Red Grass dominated grassland during construction. Mitigations on midslope or wetland ecotone areas are necessary to allow natural underground seepage towards the drainage lines. If it requires construction to be closer than 100m to the wetland the ecological impact would be higher.

In addition, upon construction site dis-establishment, all denuded areas will be re-vegetated and temporary roads deep ripped to alleviate compaction.

Management of the flora on-site is to be reviewed after wetland delineation exercise has been completed.

4.9.2 Summary checklist of reasonable measures mitigating Impacts associated with Flora and relevant performance criteria

Impact	Mitigation measure 🔀	~	Performance criteria 🔀	✓
 Reduce biodiversity Exposure of soil to soil loss in runoff Damage to property Additional identified impact/s? 	 Landowner agreements – borrow pits, use of fire to protect assets and fire threat emergency procedure, transplanting of trees in the way construction Identify roles and responsibilities Identify line of communication Have and make available site access plan Use clear signage and danger tape to cordon off identified protected plant species Trained personnel in the use of herbicide to control vegetation particularly for defining tracer lines in the establishment of fire breaks Safe storage of hazardous chemicals Emergency procedure for spills Monitoring against standards for environmentally safe agricultural soils 		 Only vegetation cleared as required for site construction purposes No vegetation interfering with structures and statutory requirements upon completion of the contract No de-stumping of vegetation on river and stream embankments No visible erosion scars three months after completion of the contract due to vegetation removal No visible damage to the vegetation outside the site one year after completion of the contract due to herbicide leaching No litigation due to unauthorised removal of vegetation No unnecessary damage to natural features Vegetation rehabilitated according to ecologists recommendations in shortest possible timeframe to prevent soil erosion 	

4.9.3 Golden Rules

1. Landowner engagement agreements regarding fire hazard

 It is extremely important that the appointed contractor know his responsibility regarding fire protection and management. Preferably, the contractor should arrange with the landowner/farmer to burn firebreaks around the construction site camp to protect assets.

2. Site access plan and signage

• Protected vegetation should be clearly marked and totally avoided.

3. Herbicide application

• Trained and certified competent staff should apply herbicide for purposes of vegetation control.

4. Fire as a Management Tool

 If the contractor is to engage in the use of fire to manage vegetation in and around the construction site camp, he should do so via consultation with landowner, fire protection officer and knowledge of importance of the geographically specific Fire Danger Index. The contractor staff should be properly trained and equipped to handle wild fires.

5. Emergency procedures and correct PPE

 Hazardous chemicals should be clearly labelled and correctly stored. Competent operators should use the correct PPE and an emergency procedure should be practiced and available in the event of accidents and wild fire.

4.9.4 **Ecological Survey Findings** (See appendix for complete report)

4.9.4.1 Site vegetation description

The site vegetation is *Themeda triandra* grassland in a good condition. The area has not been ploughed and is therefore representative of Acocks' Themeda veld or Turf Highveld (Veld Type 52) or of the Low & Rebelo Veld Type: Moist Clay Highveld Grassland (Veld Type 35). This grassland is generally in a well managed condition, but a mosaic of well managed grassland and patches dominated by tall *Hyparrhenia hirta* (Thatching Grass) *Eragrostis plana* (Taaipol) and *Cynodon dactylon* (Coach Grass/Kweek) is observed. This *H. hirta / E. plana / C. dactylon* dominated grassland patches occur mostly under the power lines where the grassland is mowed (and where fire is not the main management tool to reduce the grass fuel load). In the centre of the crest and towards the west on the midslope ecotone organic material accumulated to possibly more than 5 tons/ha posing high fault risk if uncontrolled fire burn in this area.

4.9.4.2 **Construction camp position in relation to ecological resource** (Refer figure on construction site layout in relation to soil resource/s above)

The impact of the development on the vegetation is envisaged to be moderate to high. Most of the area is pristine grassland dominated by Red Grass. The shallow rocky outcrops may also be the habitat of threatened plant species, for dolerite on the Highveld is often associated with Red Data species (including some bird species). However, as this report reflects vegetation from a winter survey a follow-up survey(s) is/are proposed during the wet seasons (for December/January).

Despite the importance of the Red Grass on site it will be more important to keep the construction camp away from the wetland area. Therefore it is expected the grassland areas will be impacted. Specific mitigation measures include retaining the grassland within the construction camp by mowing the affected area. **Keep any scraping (blading) the soil to an absolute minimum, including the scraping of temporary access roads.** Rather mow and drive over the grass. Cut

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grass is to be removed. Where scraping is necessary remove the topsoil with Red Grass intact and store in a maintained location for reintroduction back on site at the end of construction.

Local rehabilitation should begin as soon as construction activities cease on any area of the site.

4.9.4.3 Access road in relation to vegetation

Utilise the existing access road. Should any temporary access roads be required these should be created as described immediately above (see 4.9.4.2). **Therefore scraping of temporary access roads should be avoided.** Local rehabilitation should begin as soon as construction activities cease on any area of the site.

4.9.4.4 Rehabilitation

Care should be taken not to disturb the topsoil for any disturbance of the topsoil cause permanent loss of the *Themeda triandra*-dominated grassland character. Preventative measures include the insurance that sunlight always falls directly on the grass layer. Building material should not be allowed to be placed on the grass in such a way as to deprive it from sunlight. Instead rather use areas that are already disturbed where Coach Grass or Weeping Love Grass or Taaipol dominates. Mowing of the grassland may also cause permanent loss of Red Grass when the mowed material is not immediately removed. Mowing of the grassland under the power lines is not recommended but controlled burning is recommended instead (Chris Austin from Environet can be contacted for a fire management course – Cell 083 459 0504).

In the even where it is inevitable that an area with Red Grass dominating will be disturbed the sod with topsoil should be removed to a depth of 250mm to 300mm and be kept moist (so that the roots are in contact with shallow water) in open areas where sunlight can shine on the Red Grass. Red Grass can also be planted in plug form, which is an expensive exercise, but it should prove to be successful. Grass cover after rehabilitation should be as close as possible (or better) than the norm for this veld type. A realistic target would be to restore grass tuft distance to a minimum of 3cm. Planting of Red Grass plugs are recommended above sowing, but depending on the size of area that would need restoration, sowing can be considered. Coach Grass (*Cynodon dactylon*) seed is recommended for sowing and not *Eragrostis curvula* due to the high fire risk that result in the long term if the latter species is chosen.

4.9.4.5 Clearing of vegetation

Vegetation clearing to allow for site establishment as well as construction purposes will sometimes be required. Vegetation can be cleared mechanically with a bulldozer where terracing is required, but should be cleared by hand on other areas. All alien vegetation shall be eradicated from site during the project. Indigenous vegetation that does not pose any risks to the operation of the substation upon completion of the contract should be retained for aesthetic purposes. Such vegetation shall be identified during design and clearly indicated on the site plans.

No clearing of vegetation beyond 5m from the final security fence will take place during construction unless specifically approved by the CECO.

No protected or endangered species of plants shall be removed without a PERMIT from Nature Conservation. Where such species have to be removed due to interference with structures, the necessary permission and permits shall be obtained by the CECO prior to commencement of site works. Search, rescue and replanting of indigenous, valuable and protected species is highly recommended where possible and viable.

The use of herbicides shall only be allowed after a proper investigation into the type to be used, the long-term effects and the effectiveness of the agent. Eskom's guidelines regarding the use of herbicides (TRR/S91/032) shall be adhered to strictly. Application shall be under the direct supervision of a qualified technician. All surplus herbicide shall be disposed of in accordance with the Supplier's specifications.

The Contractor for vegetation clearing shall comply with the following parameters:

- The contractor must have the necessary knowledge to be able to identify different species.
- The contractor must be able to identify declared weeds and alien species that can be totally eradicated.
- The contractor must be in possession of a valid herbicide applicators licence.

The Contractor shall supply a method statement regarding vegetation clearing at the tender stage.

NATURAL FEATURES SHALL BE TAKEN INTO CONSIDERATION DURING DESIGN AND WHERE POSSIBLE THESE SHALL BE PROTECTED UNLESS THEY WILL INTERFERE WITH THE OPERATION OF THE SUBSTATION.

4.9.5 Monitoring

Vegetation biomass is to be measured in the vicinity of the substation – in particular the vegetated area directly representing the 30m swath of the perimeter surrounding the substation. This area will be managed during the operational phase to prevent fire hazard either through mechanical or fire. The CECO is to be inducted in the use of a disc metre to measure biomass and to keep baseline records at sire establishment, prior to mechanical control or burning of firebreaks.

4.10 Fauna

4.10.1 Communication for success

As regards fauna, The Site Construction Manager and CECO are responsible in ensuring that this resource remains protected throughout the duration of the project.

On approach to the substation construction site Grass Owl and Guinea fowl were observed. Once on site a walk around the perimeter of the existing substation drew attention to the occurrence of Cape Clawless Otter and Black-backed jackal. This particular location is known to support the rare and endangered Golden Mole and African Weasel. Care should be taken during excavation not to harm these creatures. The Poisonous snake, the Rhinkals occurs in the area and care should be taken not to disturb it. It is recommended that the contact details of the local Parks Board Wildlife Protection Officer be obtained so that if necessary assistance may be procured.

A critical consideration regarding the protection of fauna is not to disturb both fauna and habitat represented in the vicinity of the construction site. Therefore an essential golden rule will be to strongly prohibit poaching and breaching of access to areas out-of-bounds as indicated on the site access plan.

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- 4.10.2 Summary checklist of reasonable measures mitigating Impacts associated with Fauna and relevant performance criteria

Impact	Mitigation measure 🔀	~	Performance criteria 🔀	~
 Calving and lambing mortalities associated with construction disturbance Electrocution of taller game species Animal mortality related with tower structure Power outage Additional identified impact/s? 	 ✓ Limit construction during calving & lambing season ✓ Limit or no disturbance during times of nesting ✓ Identify risk areas and install guards etc. ✓ No poaching or hunting ✓ Educate staff on local fauna – use posters to highlight specific species requiring protection 		 ✓ Confirmation of engagement and agreement with landowner regarding claim arising from animal mortalities relating to electrical infrastructure ✓ Construction site properly fenced ✓ Site personnel awareness and action to protect fauna – if found nesting etc. ✓ Signage and areas requiring protection adequately fenced off ✓ No stock losses where construction is underway ✓ No complaints from Landowners and Communities ✓ No litigation concerning stock losses and animal deaths 	

In addition, the Contractor shall under no circumstances interfere with livestock without the Landowner or Community members being present. This includes the moving of livestock where they interfere with construction activities. Should the Contractors workforce obtain any livestock for consumption, they must be in possession of a written note from the owner. The transportation of meat for consumption shall take into consideration any legal requirements regarding the spreading of disease. No poaching shall be tolerated under any circumstances.

4.10.3 Golden Rules

1. Communication - have and make available site access plan

 Crucial to the success of the project in ensuring zero or limited environmental damage is ensuring that all site personnel know and understand the construction site layout. Site personnel need and must know where they can and cannot go and this must be policed. Knowledge on local fauna and avifauna must be communicated to all personnel in a manner that the need for their protection and conservation is fully understood.

2. Clear Signage

 Areas out-of-bounds should be clearly sign posted and if necessary, demarcated with construction/danger tape. A fence dropper/s may be necessary to demarcate a nesting site, however, to avoid unnecessary disturbance it should be placed away from the nest itself.

3. Landowner Agreements

- Access no access to areas that have not been covered in written agreement/s.
- Culling for rations
- Fencing and injury of livestock by equipment relating to construction and line infrastructure

4. No Hunting or Poaching

• Unless by landowner agreement, hunting is totally prohibited

5. Animal & Bird Protection

- Speed Limit
- Prohibit construction during nesting times
- Adhere to the construction site/landowner property speed limit be aware of animals crossing the road and birds feeding on carrion in the road.

6. Housekeeping

• The construction site should be well kept at all times and waste disposed in bins designated paper, glass, plastic, rubber and metal/parts.

4.10.4 Monitoring

The CECO will conduct fence line checks to determine the state of fencing, particularly its ability to keep livestock out. Areas requiring repair shall be photographed – temporarily repaired and reported to the landowner immediately for more substantial repairs.

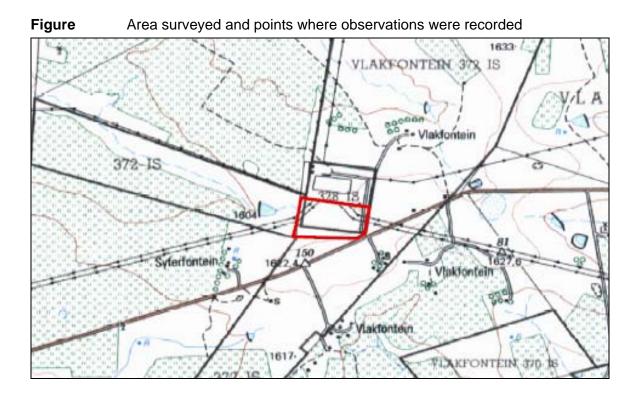
4.11 Archaeology

4.11.1 Communication for success

Responsibility lies with the Construction Site Manager and the CECO to ensure that any archaeological finding or existing resource remains protected to augment the national archaeological and heritage register.

The area of the proposed Zeus substation expansion was surveyed on foot. No sites were discovered, apart from a graveyard, which appears to be on or just within the boundary of the proposed expansion. The graveyard consists of 56 graves. It is recommended that the graveyard be left undisturbed, but should it need to be moved, a set process as determined by the South African Heritage Resources Agency will have to be followed for the grave relocation.

The graveyard could be a place of significance to the descendents of the people buried there. It is assumed that these are the graves of local farm workers, who may no longer be in the vicinity. This would, however, have to be established through research and community consultation. The only other cultural material observed is the line of packed rocks, but this would be deemed of low significance, as the line is not associated with any other structure or cultural material, and its purpose cannot be determined.



4.11.2 Summary checklist of reasonable measures mitigating Impacts associated with Archaeological resource/s and relevant performance criteria

Impact	Mitigation measure	Performance criteria 🔀	✓
 Damage to existing and newly discovered sites Substation foundations may impact on artefact occurrence (depending on depth of both) Additional identified impact/s? 	 ✓ Create awareness amongst construction site personnel ✓ Archaeological investigation (shovel testpits) to determine significance of artefact occurrence. ✓ Permit required from SAHRA 	 Induction of all construction project players on the significance of archaeology and new discoveries Ring fencing of existing site archaeological resources – e.g. grave sites Proof of contact details of registered authority and local SAHRA representative Landowner/Client Agreement regarding protection and access to existing resources No destruction of or damage to known archaeological sites Management of existing sites and new discoveries in accordance with the recommendations of the Archaeologist No destruction of or damage to known sites Management of existing sites and new discoveries in accordance with the recommendations of the Archaeologist No destruction of or damage to known sites Mo destruction of or damage to known sites No litigation due to destruction of sites 	

4.11.3 Golden Rules

1. Landowner agreements

• Prohibition of access from existing heritage sites e.g. those from which tourism interest and revenue is generated.

2. Have and make available site access plan

• Having knowledge of the site, ensure that archaeologically sensitive areas are kept outof-bounds and that this is communicated to all construction site personnel.

3. Use Clear Signage and demarcate sites out-of-bounds with fencing

 Areas requiring protection and conservation should be sign posted and protected using fencing and fence droppers

4. Regulations and permits

• In the event of a new archaeological discovery during the process of construction, halt construction, and liase with the Client Environmental Control Officer to obtain a permit to continue.

5. Use spotters

 If a site, through previous survey, is known to have archaeological heritage, trained spotters must be used to act as the eyes for operators of plant such as bulldozer and TLB. This role requires strict adherence to the Safety Rule of being highly visible and a luminescent safety vest in recommended.

4.11.4 Archaeological Survey Findings (See appendix for complete report)

4.11.4.1**Construction camp position in relation to Archaeological resource/s** (Refer figure on construction site layout in relation to Archaeological resource/s above)

No further action is required for any of the occurrences observed apart from the graveyard.

There are two options that can be considered in relation to the graveyard:

- 1. The graveyard remains *in situ*:
 - A management plan for the graveyard during and after construction needs to be in place. This is to ensure that the graves are not damaged during the construction phase, and that they are not inadvertently damaged in the future.
 - The graveyard needs to be fenced off for the duration of the construction phase, and clearly marked with red & white bunting tape or similar marking.
 - The graveyard needs to be marked on all maps and plans of the substation.
 - An attempt should also be made to establish whether there are people who still have links with the graveyard, whether they visit the graves, and whether they wish to have access to the graves in future. Any management plan will have to include the results of this investigation and consultation with the relevant individuals. A mutually acceptable management plan will have to be adhered to, with responsibilities for the maintenance of the graveyard clearly outlined, as well as mechanisms for monitoring this. Should access be required to the graveyard by relatives, this must be clearly set out in the management plan.

2. The graveyard is relocated:

If the graveyard is to be relocated, a permit will have to be obtained from SAHRA for the purpose. Although one of the graves dates to 1968, and therefore technically falls outside the ambit of the Act, the probability is high that many of the graves will be older than 60 years. It may be possible to establish this through a process of community consultation and research.

The National Heritage Resources Act (Act No. 25 of 1999, see Appendix 1) and SAHRA permit regulations (Government Gazette Vol. 240, No. 21239) have strict guidelines, which must be followed during a grave relocation process

NOTE: Should the developer encounter any heritage resources, not reported on in this document, and as defined and protected by the NHRA (1999) during the course of development, the developer should immediately cease operation in the immediate vicinity and report the site to SAHRA or an ASAPA accredited CRM archaeologist.

4.11.4.2 Survey findings and recommendations

No sites were found in the area surveyed. However, a graveyard was located in the western portion of the surveyed area. This graveyard lies either on the boundary of the area, or just within it. Three inspection pits were dug around the graveyard (see map), so it was assumed during the survey that the area is included in the substation expansion.

The graveyard consists of 56 graves (see graveyard plan in archaeologists report). The distribution of the graves is indicated on the plan, but is basically linear in a north-south direction. Two of the graves (at the 'head' of the graveyard) face north, while the rest of the graves face east. The graveyard is located on a hillside, which slopes downhill towards the north. Three of the graves have gravestones or plaques with names on (although only two can still be read), and these indicate that the graves are probably those of local farm workers. Two of the graves have dates: 1922 and 1968. The 1968 grave is one of the two graves at the 'head' of the graveyard, while the 1922 grave is located near to the middle of the graveyard. This would appear to indicate that most of the graves are older than 1968. All graves older than 60 years outside a formal burial ground are protected by the National Heritage Resources Act (Act no. 25 of 1999).

Distribution of other occurrences include:

A line of packed rocks was observed near to the graveyard. The purpose of these rocks is difficult to determine. Two sets of hollows were observed near to the graveyard. These hollows (a set of three and a set of five) are circular, about 2 to 5 m in diameter, and appear to have been dug with the aid of a machine. Their purpose is unknown. Various other indications of disturbance and 323_Zeus_21-08-07_v4 PBAI (SA)

digging in the ground were observed. Heaps of soil and rock were observed under the pylons on the eastern side of the surveyed area, and appear to relate to the digging of a ditch nearby. No cultural material was found on the surface or in the vicinity of the dolerite outcrops.

Should any archaeological sites be uncovered during construction, their existence shall be reported to Eskom immediately, John Geeringh to be informed at 011 800 2465 or the Regional Environmental Advisor. The position of any known sites shall be shown on the final design plans. Such areas shall be marked as no go areas. Artefacts shall not be removed under any circumstances. Any destruction of a site can only be allowed once a permit is obtained and the site has been mapped and noted. A permit shall be obtained from the National Museum through a reputable Archaeologist.

All monuments and historical sites shall be treated with the utmost respect. Any graves shall be clearly marked and treated as no go areas. No destruction of any site shall be allowed. Should it be necessary to remove any graves, the necessary procedures shall be followed and permits obtained.

4.11.5 Monitoring

Trained spotters should be observing the process of construction excavation and must halt the process if the presence of any artefacts is realized. It is crucial that this role requires the spotter to be highly visible to prevent harm to him/her from machinery. Disposable dust mask and luminescent vest and steel toe capped boots are standard PPE requirements for a spotter.

4.12 Receiving Society Infrastructure

4.12.1 Communication for success

Engagement with the landowner by the contractor regarding local service networks is crucial to facilitate integration of the Contractor project team – inclusive of all site personnel, into the local society for the duration of the project. The Contractor should use the following list as a starting point and from which relevant contact details should be obtained and arrangements made:

- Local tourism establishments within close proximity to the construction site
- Local NGO's e.g. Famsa, conservation bodies and landowner associations
- Local Security Service providers
- Local Police Contact details
- Local Fire Protection Officer details
- Local General Supply Store or Co-op details
- Local Parks Board Wildlife Protection Officer

A development project of this nature may have some social impact. Within a National context of striving for ecosystem health, the positive impacts that development projects can bring into an area must be highlighted and used to uplift local communities. Some positive impacts would be:

- To enhance education of the local populace ABET, Basic Money Management; to
- Improve community health through education about disease, particularly HIV Aids and Tuberculosis; and
- Provide temporary employment.

A perceived negative impact associated with construction has always been increase in local crime levels. The above listed positive impacts plus diligent management of construction site security and personnel can offset this negative perception.

4.12.2 Summary checklist of reasonable measures mitigating Impacts associated with

Impact	Mitigation measure	✓	Performance criteria 🔀	✓
 Not paying a living wage and outcome of poverty stimulation including disease and crime Damage to landowner income producing infrastructure and theft of equipment HIV Aids & TB risks Unwanted pregnancy Increased exposure of lower income levels to credit risk and substance abuse Additional identified impact/s? 	 Paying living wages in line with the construction industry standards Education plans for health, handling money and Adult Basic Education and Training (ABET) Arrangements for construction site medical health including availability of condoms Inductions 		 No complaints from Landowners, Regional staff or Communities No damage to private property No unplanned disruptions of services No damage to any plant or installations No complaints from Authorities, Landowners and Communities regarding disruption of services No litigation due to losses of plant, installations and income Proof of educational arrangements for health, handling money and Adult Basic Education and Training (ABET) including schedule and contact details of local teacher/s 	

Receiving Society Infrastructure and relevant performance criteria

4.12.3 Golden Rules

1. Landowner agreements

• Agreement relating to existing landowner infrastructure and condition prior to construction establishment must be captured and agreed by the landowner and contractor.

2. Education schedules

 As part of general health and safety, the contractor shall provide a schedule of informative presentations on HIV Aids and Tuberculosis education and avoidance. Condoms will be made available to all construction site personnel. The contractor will provide and carry out a schedule on judicious management of personal finances including safe use of ATM banking facilities. Provide and implement an education schedule for basic literacy.

3. Inductions

• All construction site personnel must be completely familiar with the construction site layout and areas requested out-of-bounds by the landowner.

4. Construction site personnel identification

• The contractor shall have on record and available on site the identities of all construction staff.

4.12.4 Construction camp position in relation to Receiving Society Infrastructure

If and where the substation is close to any inhabited area, the necessary precautions shall be taken by the Contractor to safeguard the lives and property of the inhabitants. The Contractor shall under no circumstances interfere with the property of Landowners, Regional staff or nearby Communities.

No interruptions other than those negotiated shall be allowed to any essential services. Damage to infrastructure shall not be tolerated. The contractor shall rectify any damage immediately. A record of any damage and remedial actions shall be kept on site.

All existing private access roads used for construction purposes, shall be maintained at all times to ensure that the local people have free access to and from their properties. Speed limits shall be enforced in such areas and all drivers shall be sensitised to this effect.

Any possible disruptions to essential services must be kept to a minimum and should be well advertised and communicated to the Landowners and surrounding Communities. Care must be taken not to damage irrigation equipment, lines, channels and crops, as this could lead to major claims being instituted against Eskom and the Contractor. The position of all pipelines and irrigation lines in the vicinity of a site must be obtained from the Landowners or local Community and clearly marked. Where required such lines shall be deviated.

4.12.5 Monitoring

Site induction must be provided to all new recruits to the construction site. In addition to an introduction to the specific site development, induction should include; Health & Site Safety Procedures, AIDS awareness, Family Planning, Life Skills etc. Local NGO's may be approached for their inputs in these endeavours.

4.13 Noise

4.13.1 Communication for success

The Contractor shall ensure that noise levels remain within acceptable limits. This applies especially after working hours and during the night.

4.13.2 Summary checklist of reasonable measures mitigating Impacts associated with construction site noise and relevant performance criteria

Impact	Mitigation measure 🔀	~	Performance criteria 🔀	~
1. Nuisance and negative influence on relations	 Engage with landowner regarding work times to ensure that they coincide with 		 ✓ Keep record of general complaints including noise or off-duty rowdiness of site 	
 Project delays Additional identified impact/s? 	 ✓ Do not work outside of the agreed hours ✓ If an activity is reported to be too noisy – monitor it according to construction site standards and make the necessary arrangements to improve on lowering associated the decibel level 		 personnel received from Landowner or community – show proof of arrangements to improve the situation ✓ No complaints from landowner or community ✓ No litigation ✓ No formal complaints or claims arising due to noise pollution 	

4.13.3 Golden Rule

1. You are a guest – behave accordingly

4.13.4 Monitoring

As this particular site is largely isolated the standard for noise tolerance will need to be negotiated between the Landowner and the Contractor Site Manager. A starting point would be to keep to normal working hours thereby mitigating the possibility of raised noise levels after hours. The contractor must give consideration to the very real possibility that the Landowner may entertain guests during the week and on weekends. Any after hours working is to be agreed with adjacent landowners. Furthermore efforts should be made to ensure that contractor site personnel are courteous and do not engage in raucous weekend parties.

4.14 Dust

4.14.1 Communication for success

The Contractor shall be responsible for dust control on site to ensure no nuisance is caused to the Landowner, neighbouring Communities or Regional staff at the substation. Watering of access roads is recommended, as this is normally the greatest cause of dust pollution. Speed limits can also be affected, especially on private dirt roads leading to the site. The Contractor shall attend to any complaints or claims emanating from the lack of dust control immediately.

4.14.2 Summary checklist of reasonable measures mitigating Impacts associated with
construction site dust and relevant performance criteria

Impact	Mitigation measure 🔀	✓	Performance criteria 🔀	✓
 Nuisance and negative influence on relations Project delays Additional identified impact/s? 	 Engage with landowner regarding work times to ensure that they coincide with landowner work times Do not work outside of the agreed hours If an activity is reported to be too dusty – monitor it according to construction site standards and make the necessary arrangements to improve on lowering the associated decibel level 		 ✓ Keep record of general complaints including noise or off-duty rowdiness of site personnel received from Landowner or community – show proof of arrangements to improve the situation ✓ No complaints from landowner or community ✓ No litigation ✓ No formal complaints or claims arising due to dust pollution 	

4.14.3 Golden Rule

1. You are a guest – behave accordingly

4.14.4 Monitoring

The CECO is to carryout spot checks on the operation of the water tanker – dust is to be wetted down regularly, particularly after road use by heavy vehicles and the dry winter months. If dust becomes a nuisance and complaints are received despite wetting the road/s, then dust monitoring of dust levels should be employed to prove to the Interested and Affected Parties that the levels are inside those deemed bearable for operators working on construction site and the general public.

4.15 House Keeping of Construction Site

4.15.1 Communication for success

It is said that if a construction site camp is neatly kept and all is kept in it's place, then generally, it reflects good site management. Furthermore, such an appearance generally reflects that the rules are understood and implemented and the project is running smoothly. Considering this, it is the responsibility of the Contractor Site Manager to enforce cleanliness of the construction site camp. The CECO will monitor, police and report on this performance requirement. Littering by the employees of the Contractor shall not be allowed under any circumstances.

The site shall be kept visually and aesthetically pleasing, especially in and around the Contractor camp. The ECO shall regularly inspect the site to ensure that it is neat and clean. Where required the campsite shall be screened by the Contractor to ensure that there is no unacceptable visual intrusion in the area of the site. Screening may be required in certain circumstances where visual impacts are sensitive, though these are not expected on this site.

4.15.2 Summary checklist of reasonable measures mitigating Impacts associated with construction site Housekeeping and general cleanliness and relevant performance criteria

Impact	Mitigation measure 🔀	 ✓ 	Performance criteria	✓
 Nuisance and negative influence on relations Project delays Additional identified impact/s? 	regarding work times to		 Keep record of general complaints including noise or off-duty rowdiness of site personnel received from Landowner or community – show proof of arrangements to improve the situation No complaints from landowner or community No litigation No formal complaints or claims arising due to poor house keeping No complaints from affected parties on or around the site Filed photographic record of non-compliance 	

4.15.3 Golden Rules

1. You are a guest – behave accordingly

4.15.4 Monitoring

The CECO shall demand a neatly kept construction site at all times and have the contrary rectified immediately by the Contractor Site Manager.

4.16 Sensitive Electrical Equipment/Assets

4.16.1 Communication for success

Once the contractor has received equipment for which the infrastructure is being built, it is his responsibility to keep it safe and in delivery condition until installed.

All equipment moved onto site or off site during a project is subject to the legal requirements as well as Eskom specifications for the transport of such equipment. Oil filled equipment such as CT's, VT's and capacitor cans have specific safety requirements regarding their handling, transport and storage. The Contractor shall meet these safety requirements under all circumstances. All equipment transported shall be clearly labelled as to their potential hazards according to specifications. All the required safety labelling on the containers and trucks used shall be in place.

It is understood there is no equipment planned for the site that contains PCBs (Poly Chloro-Biphenyls). However, old equipment removed from the site may contain PCBs and the Contractor will need to follow the requirements of Eskom Corporate Directive ESKADAAO3 REV 1.

The Contractor shall ensure that all the necessary precautions against damage to the environment and injury to persons are taken in the event of an accident and shall supply a method statement to that effect.

4.16.2 Summary checklist of reasonable measures mitigating Impacts associated with

Impact	Mitigation measure 🔀	✓ Performance criteria ✓
1. Damage to equipment in	 ✓ Eskom competent to supervise offloading 	✓ All equipment delivered to site intact
handling 2. Damage to	 ✓ Eskom competent to ensure safe storage 	✓Nospillageofhazardous substances□
equipment in storage prior to	 ✓ Eskom competent to supervise installation 	✓Nolitigationduetoenvironmental pollution□
installation 3. Damage to	✓ Check for PCBs and hazardous substances	Safe transport of equipment □
equipment during installation		
4. Removal of old equipment from		
site. 5. Additional		
identified impact/s?		

Sensitive Electrical Equipment/Assets and relevant performance criteria

4.16.3 Golden Rules

1. Sensitive Electrical Equipment/Assets are Eskom's property

 Unless instructed in writing, the contractor shall have nothing to do with Sensitive Electrical Equipment/Assets

2. Keep Sensitive Electrical Equipment/Assets Safe

4.16.4 Monitoring

Eskom shall check its sensitive equipment stored on site and report any damage caused by mishandling at delivery, vandilism and curiosity during storage and breakage due to lack of experience during installation/erection.

4.17 Induction and Training

4.17.1 Communication for success

It is generally agreed that personnel who are afforded training perform their tasks better and this is a prerequisite for compliance to the Environmental Management Programme.

All site personnel are to undergo a full induction covering the contents of this document and primarily delivered by the CECO and Construction Site Manager.

The Contractor is to ensure that all site personnel are trained to fulfil their operational responsibilities. The CECO will check for proof of this requirement. In the case of training in:

- 65
- Basic Fire-fighting,
- Herbicide use, and
- Vegetation identification etc.,

There may be a necessity for training on the job. If this is the case then the Contractor must factor this into his training budget. The services of accredited trainers are to be engaged – preferably local, for on site training. Similarly, adult basic education and life skills training costs need to be taken into account by the contractor. Spotters for archaeological artefacts should undergo an induction by registered SAHRA representatives.

4.17.2 Summary checklist of reasonable measures mitigating Impacts associated with Induction and relevant performance criteria

Impact	Mitigation measure 🔀	✓	Performance criteria 🔀	~
No training = risk of non-compliance Additional identified impact/s?	 All site personnel to receive a full induction on the contents of this document Unskilled individuals will be up-skilled Basic Life Skills will be taught throughout the duration of the project 		 ✓ Proof of certification of personnel and operators ✓ Accredited trainer ✓ Proof of ABET, FAMSA & Basic Life Skills programme and implementation for the duration of the project 	

4.17.3 Golden Rules

1. All site personnel will undergo and induction and sign their receipt thereof

4.17.4 Monitoring

Contractor Site Manager to supply proof on request of signed documentation proving existing and new staff have been operationally trained and have received an induction covering comprehensively the contents of this document

5.0 METHOD STATEMENTS FOR THE CONTRACT

The Contractor shall supply method statements for all works required as stated throughout this document **as per specific contract requirement**. All agreements regarding **extra works for environmental compliance** shall be in writing and well documented. Work shall only commence upon approval by Eskom.

The CECO shall ensure that all works are in accordance with method statements and contract specifications.

6.0 LEGAL REGISTER

• Conservation of Agricultural Resources Act, Act 43 of 1983 and amendments

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- Corporate directive for the management of PCB, ESKADAAO3 REV 1
- Environmental Impact Report
- Eskom Environmental Policy, ESKPBAAD6 REV 6
- Eskom Environmental Management Procedure, ESKPVAAZ1 REV 1
- Eskom Guidelines for Herbicide Use, TRR/S91/032
- Environment Conservation Act, Act 73 of 1989 and amendments
- National Environment Management Act, Act 107 of 1998
- Fencing Act, Act 31 of 1963 and amendments
- Forest Act, Act 122 of 1984 and amendments
- Hazardous Substances Act, 15 of 1973 and amendments
- Herbicide Management, ESKPBAAD4 REV 0
- Record of Decision DEAT
- Standard passive fire protection for oil-filled equipment in High Voltage yards, TRMASAAQ8 REV 4
- Standard for management of PCB, ESKASAAC2 REV1

7.0 APPENDICES

Site Engineering Drawings Site Access Plan Specialist Reports Ecology Archaeology General Site Flora & Fauna Pro forma requiring contractor and Eskom Project Manager signatures

PRO FORMA TO BE SIGNED BY THE CONTRACTOR AND ESKOM PROJECT MANAGER

CONTRACT NAME:	 	
CONTRACT NUMBER:		

ENVIRONMENTAL COMPLIANCE

I	_ ON BEHALF OF	_(C)
I	ON BEHALF OF ESKOM	

DECLARE AS FOLLOWS:

- 1. I AM AWARE THAT CONSTRUCTION, REFURBISHMENT OR UPGRADING ACTIVITIES CAN HAVE A MAJOR IMPACT ON THE ENVIRONMENT.
- 2. I UNDERTAKE TO ADHERE TO THE REQUIREMENTS AS SET OUT IN THE ENVIRONMENTAL MANAGEMENT PROGRAMME AND THE RECORD OF DECISION FROM DEAT.
- 3. I PLEDGE TO INFORM ALL SITE STAFF OF THEIR INVOLVEMENT IN MANAGING ENVIRONMENTAL IMPACTS ON SITE.
- 4. I COMMIT TO IMPLEMENTING ENVIRONMENTAL BEST PRACTISE ON SITE AT ALL TIMES DURING THE CONTRACT.

SIGNED:	DATE:	
CONTRACTOR		
SIGNED:	DATE:	

ESKOM