

COMPLIANCE RATING PROTOCOL¹

The basis of the environmental performance assessment is the attached audit table, which captures the following information:

- A description of the requirement/ activity, specifying the phase of construction that it relates to, where the requirement was derived and what the specific requirement entailed;
- An indication of the status of the requirement under consideration. Since the assessment of the level of compliance is in part dependent on the status of the specific activity under consideration, the status of the each activity is explicitly classified as:
 - Ongoing;
 - Work in progress;
 - Not Applicable (i.e. not applicable as yet, required later, or generic requirements not applicable to this project); or
 - Complete;
- A compliance rating for each of the specific requirements/ activities. The following protocol was developed for rating the level of compliance with the various requirements of the specifications and RoD:

Score	Compliance rating	Definition
4	Full Compliance	All (100%) activities have been addressed
3	Substantial compliance	> 75 % but < 100 % of the required activities have been addressed
2	Broad compliance	> 30% but < 75 % of the required activities have been addressed
1	Partial compliance	< 30% of the required activities have been addressed
0	Non compliance	None of the required activities have been addressed

- Explanation of the compliance rating. The allocated compliance rating is substantiated by commentary regarding the reasons for a particular assessment, the evidence that supports such an assessment and proposals regarding remedial actions.
- Response from the Proponent. To ensure that the audit reflects a current and correct understanding of the activities on site, provision was made as part of the audit process for the Proponent to comment on the findings.

It should be noted that the level of compliance would be separately scored separately for the Proponent and each of the contractors.

¹ The auditing methodology presented here was used for auditing compliance for the Phase 1B expansion to the Saldanha Bay Iron Ore Terminal, and accordingly would need to be extensively revised to make it relevant to Project Bravo

**PHASE 1B UPGRADE TO THE IRON ORE FACILITY AT THE PORT OF SALDANHA: CONSTRUCTION PHASE:
ECO QUARTERLY AUDIT REPORT**

Phase	Activity	Description of requirement as per ROD or EMP	Status	Photo	Findings/ Incidents/Complaints/Evidence	Comments/ Resolution	Compliance Rating	Transnet Management Response	
Activities prior to commencement	Notice to D:EA&DP	One week's written notice given to DEA&DP before commencement of construction activities (clause 7.3.6 of RoD).							
	EMC	EMC established prior to commencement (clause 7.2.7 of RoD).							
	ECO	ECO appointed by EMC (clause 7.2.7b of RoD).							
	Environmental Management Plan		EMP approved by DEA&DP prior to construction commencing (clause 7.2.8 of RoD).						
			Any alternations to the EMP submitted to the relevant authorities for approval (clause 7.2.8 of RoD).						

Phase	Activity	Description of requirement as per ROD or EMP	Status	Photo	Findings/ Incidents/Complaints/Evidence	Comments/ Resolution	Compliance Rating	Transnet Management Response
Activities prior to commencement	Environmental Management Plan	Compliance with EMP forms part of all tender documentation for all contractors working on the project and is endorsed contractually (clause 7.2.7 of RoD).						
	Declaration of understanding	Declaration of Understanding in Contractors Guideline Document signed and part of Contractors Tender Document.						
	Method statements	Relevant method statements provided by the Contractor as part of their Tender, including: <ul style="list-style-type: none"> • Establishment of construction lay down area • Hazardous and non hazardous solid waste management • Stormwater management • Contaminated water management • Prevention of marine pollution • Hydrocarbon spills • Diesel tanks and refuelling procedures • Dust control • Spoil dumping 						

Phase	Activity	Description of requirement as per ROD or EMP	Status	Photo	Findings/ Incidents/Complaints/Evidence	Comments/ Resolution	Compliance Rating	Transnet Management Response
Activities prior to commencement	Method statements	<ul style="list-style-type: none"> Sourcing, excavating, transport and dumping of fill material Noise and vibration control Removal of rare, endemic or endangered species Rodent and pest control Environmental awareness training Site division Emergency procedures for environmental incidents Contractor's SHE officer Closure of construction laydown area 						
	Contractor's SHE Officer	SHE officer appointed by Contractor and appointment submitted to Construction Manager & EO for approval.						
	Environmental induction	All management, foreman & Workforce suppliers and visitors to site attended Induction Programme prior to commencing any work on site.						

Phase	Activity	Description of requirement as per ROD or EMP	Status	Photo	Findings/ Incidents/Complaints/Evidence	Comments/ Resolution	Compliance Rating	Transnet Management Response
Activities prior to commencement	Environmental induction	Contractor ensuring that all new personnel undergo Induction Programme and are made aware of environmental specifications on site.						
	Removal of rare, endemic or endangered species	Where applicable, Contractor has appointed a suitably qualified specialist (approved by the Project Environmental Manager), for removal of rare, endemic or endangered species, at least 3 weeks prior to commencement of any other work on site.						
Initial 2 weeks after commencement	Demarcation of the site	Where required, a temporary fence has been erected along the site boundaries of the Site and around any no-go areas identified on the layout plans, to the satisfaction of the Construction Manager.						
	Removal or rare, endemic or endangered species	Plant search and rescue (if required) undertaken and completed prior to any site clearance or any other construction activity that may damage vegetation on site.						

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Initial 2 weeks after commencement	Contractor's Environmental Officer	Sufficient number of Environmental Officers appointed to assist the Contractor's SHE Officer to monitor environmental issues. These appointments, along with details of the individuals being appointed and job descriptions, sent to the Construction Manager for his approval.						
Construction phase	EMP thereof	Copies of EMP available at the site offices of the Contractor and on Site.						
		All personnel on site (including subcontractors and their staff), as well as suppliers, are familiar with and understand the specifications contained in the EMP.						

Phase	Activity	Description of requirement as per ROD or EMP	Status	Photo	Findings/ Incidents/Complaints/Evidence	Comments/ Resolution	Compliance Rating	Transnet Management Response
Construction phase	Method Statements	Method statements required during construction submitted to the Engineer for approval at least 20 days prior to the commencement of proposed activity (with exception of emergency Method Statements. Activities requiring Method Statements have not commenced until approved by the Engineer.						
		Method Statement approved by Transnet Projects Environmental Officer and the Construction Manager.						
		Where applicable, Contractor has provided job-specific training on an <i>ad hoc</i> basis when workers are engaged in activities which require Method Statements.						
	Materials handling, use and storage	Contractor has ensured that any materials delivery drivers are informed of all procedures and restriction (e.g. which access roads to use, no go areas, speed limits, noise etc) required by the CEMP before they arrive at site and off load any materials.						

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Construction phase	Site establishment	Construction camp, office, workshops, staff accommodation and any other facilities on the site established in a way that does not adversely affect the environment.						
		Site layout plan, including plans of the exact location, extent and construction details of facilities and proposed impact mitigation measures, submitted to Construction Manager.						
		Site layout plan details locality and layout of waste treatment facilities for litter, kitchen refuse, sewage and workshop derived effluents.						
		Site layout plan approved by Construction Manager prior to construction commencing.						

Phase	Activity	Description of requirement as per ROD or EMP	Status	Photo	Findings/ Incidents/Complaints/Evidence	Comments/ Resolution	Compliance Rating	Transnet Management Response
Construction phase	Site establishment	Site offices not sited in close proximity to steep areas.						
		Sewage and effluent infrastructure approved by Construction Manager.						
		Any soak away system not closer than 800m from any natural watercourse or water retention system.						
		Toilets and latrines easily accessible and positioned within walking distance from wherever employees are employed on the works.						
		Outside toilets have locks and doors and are secured to prevent them blowing over.						
		Toilets placed outside areas susceptible to flooding.						

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Construction phase	Site establishment	Toilets maintained in clean and sanitary condition, and emptied regularly, to the satisfaction of the Contract Manager.						
		Effluent water from the camp/office sites is disposed of in an appropriately designed and constructed system, situated as to not adversely affect water sources. Only domestic wastewater is allowed to enter this drain.						
	Waste management	Appropriate waste management plan in place.						
		General and hazardous waste stored in separate labelled containers as per system.						
		Containers inspected regularly as per waste environment management plan						
		The accumulation time for waste is tracked						

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Construction phase	Waste management	Waste disposed of at a licensed landfill.						
		Documentary evidence of proper disposal of waste provided.						
		Recycling containers available (and labelled) for general waste on site.						
		Contractor's Hazardous Material's Management Program in place.						
		Information on each hazardous substance available to all persons on site.						
		Training and education about the proper use, handling and disposal of material provided to all workers who will be handling hazardous substances.						
		Transnet's EO informed of activities involving hazardous substances.						

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Construction phase	Vehicle and equipment refuelling: Control	No vehicles or machines serviced or refuelled on site except at designated servicing/ refuelling locations. Oil or lubricant changes made only at designated locations, or in case of breakdown or emergency repair.						
		Fuel and oil stored in secure, bunded area designed with a lined/ paved surface.						
		Details of fuel storage and fuelling facility approved by Transnet EO and complies with the relevant regulations.						
		Refuelling or use of fuel for backfilling operations undertaken within designated laydown area.						
		No refuelling undertaken along the shoreline adjacent to backfilling operations.						

Phase	Activity	Description of requirement as per ROD or EMP	Status	Photo	Findings/ Incidents/Complaints/Evidence	Comments/ Resolution	Compliance Rating	Transnet Management Response
Construction phase	Vehicle and equipment refuelling: Spill control	Contractor complying with relevant regulations.						
		Approved spill response plan in place.						
		Construction personnel informed of the requisite requirements when dealing with hydrocarbons.						
		Hydrocarbon leaks repaired as soon as possible.						
		Measures to prevent spills or leaks in place.						
		Sumps receiving oil or oily water emptied before overflowing.						
		Leaking or spilled drums of oil or chemicals prevented from contaminating stormwater runoff.						
		No discharge of oil or contaminants into stormwater system.						

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Construction phase	Spray painting and sand blasting	Method statement submitted to the Transnet EO and SHE Coordinator for approval.						
		Method statement approved before activity commenced.						
		Contractor informed Transnet EO of when and where spray painting or sandblasting would be carried out prior to commencement of work.						
		Transnet EO monitoring activities.						
		Where possible, painting done before equipment and materials brought on site.						
		Touch up painting done by hand or approved procedure.						
		Protection Plan issued for approval if area is in confined or elevated area.						

Phase	Activity	Description of requirement as per ROD or EMP	Status	Photo	Findings/ Incidents/Complaints/Evidence	Comments/ Resolution	Compliance Rating	Transnet Management Response
Construction phase	Dust management	Material in transit loaded and contained within the load bin of the vehicle in such a way to prevent any spillage onto roads and the creation of dust clouds. If necessary, the load bin of vehicle covered with a tarpaulin to prevent dust.						
		Dust Control Plan submitted to Transnet EO and approved.						
		Dust-suppression measures in place.						
		Vehicle speed limits of 20km/h on unpaved roads adhered to.						
		Posted vehicle speed limits on paved roads adhered to.						
		Paved surfaces within construction area washed twice a week, or as required.						

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Construction phase	Dust management	Unsurfaced and site roads sprayed with water when required.						
		Construction materials transported by truck are suitably moistened or covered to prevent dust generation.						
		Topsoil stockpiled with mounds not exceeding 2m in height.						
		System of reporting excessive dust conditions by construction personnel being implemented.						
		Water for dust control taken from approved sources.						
		Transnet has installed covers over the conveyor systems to avoid dust emissions during high wind conditions, before operational activities commence (refer to clause 7.2.2 of RoD).						

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Construction phase	Stormwater & dewatering management	Temporary drainage has been established on site during construction period (until permanent drainage in place).						
		Good housekeeping occurring to prevent contamination of drainage water.						
		Stagnant water cleared where necessary.						
		No contaminated surface water flowing off site as a result of Contractors operations. Silt traps constructed to ensure retention of silt on site and cut-off ditches constructed to ensure no run-off from the site except at points with silt traps.						
		Dewatering contained within site boundaries.						
		No discharge of dewatering water to off-site land or water bodies.						

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Construction phase	Stormwater & dewatering management	Erosion and Sedimentation Control Plan implemented and personnel familiar with plan.						
		Erosion and sedimentation controls checked and maintained.						
	Noise management	Noise generating equipment in good working order.						
		Potential noise sources conform to the SANS code of practice SANS Code 0103:1983.						
		Equipment and vehicles fitted with effective exhaust silencers.						
		If on site noise control is not effective, all noise-related occupational health provisions for personnel are met (ear plugs where necessary).						

Phase	Activity	Description of requirement as per ROD or EMP	Status	Photo	Findings/ Incidents/Complaints/Evidence	Comments/ Resolution	Compliance Rating	Transnet Management Response
Construction phase	Protection of heritage resources	Works in vicinity of any discovery (archaeological sites, graves and middens) stopped immediately.						
		Relevant parties (HWC, SAHRA etc) informed of any archaeological, heritage, graves and midden finds.						
		Works only resumed once clearance given by archaeologist						
	Fire prevention	Fires only allowed in specifically constructed facilities/equipment.						
		Firebreak cleared and maintained around perimeter of the camp and offices.						
	Supply of water for human use	Water for domestic use only abstracted with necessary authorisations.						
		Potable water available at site offices and at other convenient locations on site.						

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Construction phase	Protection of livestock or game and collection of firewood	No hunting (including traps) or fishing on site or surrounds.						
		No killing of any animal, reptile (including snakes) or bird on site or surrounds.						
		Energy sources available for construction and supervision personnel for heating and cooking purposes.						
	Environmental awareness training	All staff attended Environmental Awareness Training.						
		Record of all environmental related training of personnel kept on site.						
	Backfilling of reclamation area	Boundaries within which backfilling to take place clearly defined and demarcated.						
		Spatial extent of backfilling and associated spoil adhered to.						

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Construction phase	Backfilling of reclamation area	Quality of backfilling materials not causing pollution or alteration of the marine environment.						
		Fill material has low permeability and is compactable.						
		Inlet between the reclamation area and the bay open during reclamation.						
		No machinery operating below sea level, outside backfilling area.						
	Demolition of iron ore sampling plant	Waste disposed of as per Waste management plan.						
		Dust suppression measures implemented.						

Phase	Activity	Description of requirement as per ROD or EMP	Status	Photo	Findings/ Incidents/Complaints/Evidence	Comments/ Resolution	Compliance Rating	Transnet Management Response
Construction phase	Sensitive coastal dunes	Areas excluded from development, including adjacent coastal dunes, important indigenous vegetation and sensitive habitats, are protected by temporary fencing (clause 7.2.3 of RoD), limiting access for vehicles, machinery and materials storage.						
		Measures taken to ensure that the adjacent coastal dune system is protected from disturbance caused by construction activities (clause 7.2.4 of RoD).						
		No disposal of waste or storage of materials allowed in or adjacent to sensitive areas.						
		Transnet EO monitoring construction activities to prevent disturbance to sensitive systems.						
		No vehicles accessing road along western edge of dunes and driving onto dunes.						

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Construction phase	Sensitive coastal dunes	Construction work confined to the construction sites(s) with no interference with indigenous plant and animal species, particularly rare & threatened species & their habitats (clause 7.2.6 of RoD).						
	Groundwater Issues	Fill material has low permeability and is compactable.						
		Site is engineered to drain storm and irrigation water to the specially constructed storm water evaporation ponds.						
		Irrigation water for dust control applied sparingly and only when necessary.						
		Accidental spills contained and cleaned up immediately and contaminated soil collected and disposed of at suitably licensed waste disposal facility.						
	Social and labour issues	Record kept by contractors and subcontractors of the % of local contractors in their workforce.						

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Construction phase	Social and labour issues	Appointments made in close consultation with the SHE Coordinator.						
		Local materials used as far as possible.						
		Preference given to employment of locals previously employed at the Oyster farm.						
		Complaints register present on site and kept up to date.						
	Visual impact	Visual impact (from lighting) being appropriately mitigated.						

Phase	Activity	Description of requirement as per ROD or EMP	Status	Photo	Findings/ Incidents/Complaints/Evidence	Comments/ Resolution	Compliance Rating	Transnet Management Response
Construction phase	Compliance with other legislation	No excavation of borrow pits occurring without a permit from DME.						
		Construction activities in compliance with legislative requirements [National Heritage Resources Act (25 of 1999); Minerals and Petroleum Development Act (28 of 2002); Occupational Health and Safety Act (85 of 1993); National Water Act (36 of 1998)].						
	Rehabilitation	Rehabilitation and revegetation of all areas has occurred to the satisfaction of the Construction Manager.						
		Laydown areas rehabilitated once work on site complete.						
		Rehabilitation Plan submitted to Construction Manager 6 weeks before completion.						

Phase	Activity	Description of requirement as per ROD or EMP	Status	Photo	Findings/ Incidents/Complaints/Evidence	Comments/ Resolution	Compliance Rating	Transnet Management Response
Construction phase Construction phase	Environmental Closure Certificate	Site cleaned and cleared and everything not forming part of the permanent works removed from site.						
		Environmental Closure Certificate issued by SHE Coordinator and signed off by the Project Manager together with the Contract Completion Certificate.						
	Environmental inspections and audits	Contractor's EO undertaking daily inspections of all works places.						
		Transnet Projects EO conducting weekly inspections of all work places for which the Contactor is responsible, including.						
		Transnet EO conducting monthly inspections of the entire construction site , by observation, document check, measurement and monitoring .						
		Transnet Projects Project Environmental Manager sign off monthly inspection and monitoring reports from Transnet EO.						