

**EXTERNAL BIANNUAL INTEGRATED  
ENVIRONMENTAL AUTHORISATION AND  
ENVIRONMENTAL MANAGEMENT PROGRAMME  
COMPLIANCE AUDIT FOR THE CONTINUOUS  
DISPOSAL OF ASH AT THE EXISTING ASH  
DISPOSAL FACILITIES AT KENDAL POWER  
STATION, MPUMALANGA PROVINCE**

**COMPLIANCE AUDIT REPORT JULY 2025**

**GREEN GOLD REF NO.: GGG25/73**

**FINAL**

**DATE: 2025/08/21**

**PREPARED BY:**

**Green Gold Group (Pty) Ltd**



**PREPARED FOR:**

**Eskom Holdings (Pty) Ltd**



## **LIST OF ACRONYMS**

ADF – Ash Disposal Facility  
CQA - Construction Quality Assurance  
DEA - Department of Environmental Affairs  
DFFE - Department of Forestry, Fisheries and the Environment  
DWS – Department of Water and Sanitation  
DWS - Department of Water and Sanitation  
IEA - Integrated Environmental Authorisation  
EIA - Environmental Impact Assessment  
EO - Environmental Officer  
ECO - Environmental Control Officer  
EMPr - Environmental Management Programme  
GNR - Government Notice Regulation  
ISO – International Organisation for Standardisation  
KPS – Kendal Power Station  
OHS - Occupational Health and Safety Act (Act 85 of 1993)  
PM<sub>10</sub> – Particulate Matter up to 10 Micrometers in Size  
PPE - Personal Protective Equipment  
SAHRA - South African Heritage Resources Agency  
SHEQ - Safety, Health and Environment and Quality  
SANS – South African National Standards  
MSDS - Material Safety Data Sheet  
NEMA - National Environmental Management Act (1998)  
NEM:WA - National Environmental Management Act: Waste Act (2008)  
WUL - Water-Use License  
WULA - Water-Use License Application



## EXECUTIVE SUMMARY

Kendal Power Station was commissioned in the mid-1980s with an initial operating life of 40 years. The original dry ash dumpsite was designed to accommodate the station's ash disposal needs for this duration plus an additional eight-year contingency period. However, the power station is now expected to be decommissioned by the end of 2058 (60 years of operation plus a five-year contingency).

To manage the additional ash generated during this extended operational period, the disposal area needs to be expanded. The northern section of the existing facility has been identified as the designated site for this expansion, forming part of a project known as the "30-Year Ash Dump."

Eskom Holdings is required to conduct a biannual EMPr and IEA compliance audit DFFE Ref No.: 14/12/16/3/3/3/63) to assess the Kendal Power Station's compliance with the management actions stipulated in the EMPr and the conditions of the IEA that have been issued to it. Green Gold Group (Pty) Ltd was appointed to undertake an independent external EMPr and IEA compliance audit for Eskom Holdings at Kendal Power Station for the first quarter of 2025.

Eskom obtained a compliance score of 98.2%, which is a noteworthy increase from the previous score of 97.5%. There are however, findings that have not been closed from the previous audit. These include the findings related to the exceedance of limits in the water quality monitoring reports and quarterly internal audit reports that have not been produced in 2025. It is recommended that previous audit findings be addressed and closed. All relevant records must be easily accessible for audit purposes and made available upon request.



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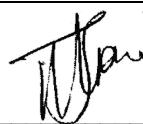


### DOCUMENT CONTROL

<b>AUDITING COMPANY</b>	Green Gold Group (Pty) Ltd
<b>PROJECT TITLE</b>	External Biannual Integrated Environmental Authorisation and Environmental Management Programme Compliance Audit for the Continuous Disposal of Ash at the Existing Ash Disposal Facilities at Kendal Power Station, Mpumalanga Province
<b>AUDIT DATE</b>	28 – 29 July 2025
<b>REPORT REF NO./</b>	GGG25/73
<b>REPORT DATE</b>	21 August 2025
<b>REPORT STATUS</b>	<b>FINAL</b>

	<b>LICENCE HOLDER</b>	<b>EXTERNAL AUDITOR</b>
	<b>ESKOM HOLDINGS</b>	<b>GREEN GOLD GROUP</b>
<b>CONTACT</b>	Ms. Patience Khoza	Mrs Thato Mdluli
<b>CONTACT DETAILS</b>	Tel: 072 106 2641 Email: <a href="mailto:khozaPM@eskom.co.za">khozaPM@eskom.co.za</a>	Tel: 012 844 0248 Email: <a href="mailto:thatom@greengoldgroup.co.za">thatom@greengoldgroup.co.za</a>

### QUALITY CONTROL

	<b>NAME</b>	<b>QUALIFICATIONS</b>
<b>LEAD AUDITOR &amp; AUTHOR</b>	Ms Lebohang Moloa	MSc (Geography), Pr.Sci.Nat. Reg No.: 400146/08, IAIAsa
<b>AUDITOR &amp; PEER REVIEWER</b>	Mrs. Thato Mdluli	BSc Hons (Geography), Cand. Sci. Nat. Reg No.: 153152
<b>SIGNATURE:</b>	 _____ Thato Mdluli	



## DECLARATION OF ENVIRONMENTAL AUDITOR

I, Lebohang Moiloa, a representative of Green Gold Group, declare that;

- I act as an external independent auditor;
- I perform all work relating to the audit in an objective, independent manner, even if this results in views and findings that are not favourable to the Licence Holder;
- There are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting the environmental audit relevant to this submission, including knowledge of Section 34 of Government Notice Regulation (GNR) 982 in terms of NEMA and National Environmental Management Act: Waste Act (2008);
- I will comply with the Acts, Regulations and relevant legislation;
- I have no, and will not engage in, conflicting interests in the undertaking of the audit;
- All the particulars furnished by me in this form are true and correct.



Signature of the lead auditor: Lebohang Moiloa

ENVIRONMENTAL AUDITOR	EXPERTISE
<b>Lebohang Moiloa</b> MSc (Geography), Pr.Sci.Nat. Reg No.: 400146/08, IAIAsa	Has completed a Master's Degree in Geography. Lebohang has more than 20 years of experience and knowledge in compliance monitoring and auditing, and environmental assessment reporting. In addition, Lebohang has successfully completed a short course Environmental Law and a short course in Environmental Management Systems.



## 1. INTRODUCTION

Kendal Power Station was commissioned in the mid-1980s with an initial operating life of 40 years. The original dry ash dumpsite was designed to accommodate the station's ash disposal needs for this duration, with additional capacity for an eight-year contingency period.

The station's operational life has now been extended from 40 years to 60 years. The power station is now expected to be decommissioned by the end of 2058 (60 years of operation plus a five-year contingency period). Because of lifespan extension and other contributing factors, such as lower dry ash density and an increased load factor, the initial dry ash dump site has become insufficient. To manage the additional ash generated during this extended operational period, the disposal area needs to be expanded. The northern section of the existing facility has been identified as the designated site for this expansion, forming part of a project known as the "30-Year Ash Dump."

Eskom Holdings was issued with an Integrated Environmental Authorisation (IEA) in terms of the National Environmental Management Act, Act No. 107 of 1998 (NEMA), as well as a Waste Management Licence (WML) in terms of the National Environmental Management: Waste Act, Act No. 59 of 2008 (NEM: WA). The IEA, WML, and the approved Environmental Management Programme (EMPr) are binding documents for the lifespan of authorised activities.

Eskom Holdings is required to conduct biannual audits to assess its compliance with the management actions stipulated in the EMPr and the conditions of the IEA. Green Gold Group (Pty) Ltd was appointed to undertake an independent external compliance audit for the second quarter of 2025. The audit was undertaken in July 2025.

## 2. PROJECT LOCATION

Kendal Power Station is located at 26°05'21.25"S, 28°58'13.36"E, situated about eight kilometres south of the N12 national highway. This strategic location lies northeast of the town of Ogies, which serves as a key mining and energy hub in the region. Administratively, the site falls within the Emalahleni Local Municipality, part of the Nkangala District Municipality in the Mpumalanga Province. Below is the locality map of the power station (Figure 1)





**Figure 1: Locality of Kendal Power Station**

### **3. AIM OF THE AUDIT**

The aim of this audit is to assess and quantify Eskom Holdings' overall compliance status with the EMPr and IEA issued for the ash disposal facilities and associated infrastructure. The audit will further assess the effectiveness of the EMPr in managing potential risks and provide recommendations for amendment if deemed inadequate. Recommendations based on the audit findings will be stipulated.

### **4. AUDIT SCOPE AND METHODOLOGY**

Green Gold Group has an audit plan that is based on the principles of the best practices of Environmental Auditing, such as South African National Standards (SANS) 19011:2018. Below is a summary of the key environmental audit principles that were applied when carrying out an audit:

- Evidence-based approach
- Independence
- Fair presentation
- Ethical conduct
- Due professional care

The audit methodology followed in this EMPr and IEA incorporates Section 34 of Government Notice Regulation (GNR) 982 in terms of NEMA. The environmental compliance audit report incorporates SANS 19011:2018 and Appendix 7 of the NEMA (Environmental Impact Assessment (EIA) Regulations.

#### **4.1 AUDIT SCOPE**

The scope of this external audit covers an EMPr and IEA (issued to Kendal Power Station since its inception; the EMPr and IEA are listed in Table 1). The EMPr and IEA were reviewed to determine the scope of the external audit. From the EMPr and IEA, audit checklists were drawn (APPENDIX 2: COMPLIANCE AUDIT CHECKLISTS). Each checklist captures the conditions of a particular EMPr and IEA, and these are used to gauge whether the EMPr and IEA Holder has complied or is complying with each EMPr and IEA condition. The audit process followed includes an on-site and off-site document review, data verification, site inspections, evidence collection, and report writing. Table 1 below provides a list of documents used for the compilation of audit checklists.



**Table 1: Environmental Management Programme and Environmental Authorisations Covered in the Audit**

DOCUMENT NUMBER	DATE ISSUED	DESCRIPTION
<b>1. 14/12/16/3/3/3/63</b>	28/07/20215	APPLICATION FOR INTEGRATED ENVIRONMENTAL AUTHORISATION IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998: GN R. 543 AND NATIONAL ENVIRONMENTAL MANAGEMENT: WASTE ACT, 2008 GOVERNMENT NOTICE 921: CONTINUOUS DISPOSAL OF ASH AT THE EXISTING ASH DISPOSAL FACILITIES AT KENDAL POWER STATION, MPUMALANGA PROVINCE
<b>2. 240-153243141</b>	09/2021	FINAL AMENDED ENVIRONMENTAL MANAGEMENT PROGRAMME FOR THE KENDAL POWER STATION CONTINUOUS ASH DISPOSAL FACILITY

#### **4.1 REVIEW OF DOCUMENTS**

Additional documents that were reviewed and verified as part of the audit are in Table 2.

**Table 2: Additional Documents Reviewed**

NO.	DOCUMENT
a)	CCT Kendal Refurbishment Project Environmental Compliance Status 28 July 2025
b)	Monthly External Compliance Audit Reports – May 2025
c)	Updated Alien Control Programme
d)	Notification of Stream Diversion Completion (DWS)
e)	Notification of Change of ECO
f)	Amendment of Environmental Authorisation DFFE Ref. No.: 14/12/16/3/3/1/2654/AM1
g)	KADF-ESK-AMB-Alien Invasive Control – 11 July 2025. Rev 003
h)	Audit Action Plan_ Continuous ADF 2025
i)	Investigation Incident Report LFC - 2025 07 21
j)	Environmental Incident Flash Report LFC - 2025 07 22
k)	Water-Use License DWS Ref.: 06/B20E/CGIJ/15283



NO.	DOCUMENT
l)	Groundwater Monitoring Report February 2025
m)	Surface Water Monitoring Reports: January 2025 – February 2025

## 4.2 SITE VISIT

Site visits for this audit were conducted on the 28<sup>th</sup> and 29<sup>th</sup> of July 2025 at the Kendal Power Station ash disposal facility (ADF). The site visits covered all activities listed in the EMPr and IEA. During the site visits, the processes and daily operations (relevant to the scope of the audit) of the ADF were observed. Interviews were conducted, and photographic records were collected.

## 4.3 RATING CRITERIA

The applied methodology enabled the auditors to rate each management measure contained in the EMPr and the conditions of the IEA in terms of compliance by using the audit rating criteria. The compliance status of each condition was assessed and allocated a symbol depending on the level of compliance. The following symbols are used in the report to illustrate compliance status:

**Table 3: Rating Criteria**

1	Full Compliance: The IEA Holder has complied fully with a condition;
0	Non-compliance: The IEA Holder has failed to comply with a condition;
N/A	Not applicable: The condition is not applicable at the time of the audit; and
-	No action required from the IEA Holder; the condition is for noting.



## 5. FINDINGS

This section outlines the outcome of the audit. The audit report also addresses the status of negative findings from previous reports.

### 5.1 PREVIOUS FINDINGS

The table below presents findings of February 2025 External Audit IEA and EMPR compliance audit reports.

**Table 4: Summary of the Findings and Recommendation Made in the 2024 IEA Compliance Report and their Current Status**

LICENSE CONDITION	COMMENT	RECOMMENDATION	CURRENT STATUS AND ACTION TAKEN
<b>IEA-16.7.4</b> <b>Monitoring boreholes</b> must be equipped with lockable caps. The competent authority reserves the right to take water samples at any time and to analyse these samples or have them analysed.	It was observed that several locks were broken and, therefore, could not be locked.	All monitoring boreholes must be equipped with lockable caps.	<b>CLOSED</b> Broken locks have been replaced.
<b>IEA- 17.6.5</b> <b>Detection Monitoring</b>  <b>IEA-17.6.5.1</b> Groundwater and surface water quality monitoring must be conducted – (a) for variables listed in Annexure III - bi-annually  (b) for variables listed in Annexure III – annually or such frequency as may be determined by the competent authority.	Several exceedances were recorded in the last water quality monitoring reports. Some of the findings noted in the reports seem to be recurring.  The most recent monitoring records provided were from February and March 2024.  <u>Surface Water Monitoring:</u> Exceedances of WUL limits for electrical conductivity and sulphates were noted at the LEE02 monitoring point. LEE02 is located downstream of the ADF. Upstream control samples were within the required limit for electrical conductivity. The elevated sulphate concentration was attributed to “An increase in sulphate in water can arise from the	Investigations must be carried out to identify the causes of the exceedances, and this must be addressed efficiently as per recommendations made in the water quality monitoring reports compiled by water quality specialists.  The investigation is to be initiated no later than 1 April 2025.	<b>OPEN</b> There are still exceedances and no investigations have been conducted.



LICENSE CONDITION	COMMENT	RECOMMENDATION	CURRENT STATUS AND ACTION TAKEN
	<p>dissolution of mineral sulphates in soil and rock, particularly calcium sulphate (gypsum) and other partially soluble sulphate minerals".</p> <p>Sample points LEE01, LEE02, CSW03, CSW02, SCH01 and SCH02 show contents of E. coli above the SANS 214:2015.</p> <p>LEE02, CSW03, CSW02, SCH01, Farm dam and SCH02 have Faecal coliforms above the SANS 214:2015 limit.</p> <p><u>Groundwater Monitoring:</u> Samples AB63, BH01D and BH02S have values above the WUL limit of 0.1 mg/l. This is possibly the result of the geology, manganese is a relatively abundant mineral, occurring in minerals that contain manganese including pyrolusite, manganite, rhodochrosite and rhodonite.</p> <p>the samples have values above the WUL limit of 0.04 mg/l. Increased zinc in groundwater, could be due to dissolution of the geology into the groundwater or zinc can also enter groundwater from industrial practices like mining, steel production, coal burning, and burning of waste.</p> <p>Sample points BH01D and BH01S total coliform in the water to be above the WUL limit of <math>\leq 10</math> mg/l. Sample point BH02S contents of</p>		



LICENSE CONDITION	COMMENT	RECOMMENDATION	CURRENT STATUS AND ACTION TAKEN
	<p>Faecal coliforms above the SANS 214:2015 limit which recommends that E. coli must be undetectable in drinking water.</p> <p>Quarterly monitoring is currently ongoing.</p>		
<b>EMPR- 5.1 Fire Protection</b>  The Contractor shall have fire-fighting equipment available on all vehicles working on site, especially during the dry winter months.	<p>Several fire extinguishers at the Lubicon site were past their service date by over six months.</p>	<p>All firefighting equipment on-site must be serviced annually. Overdue fire extinguishers must be replaced.</p> <p>This is to be addressed by the 31st of March 2025.</p>	<b>CLOSED</b> Service records of all fire extinguishers on-site are up-to-date.
<b>EMPR-6.3.5. Management of Flora</b>  The Contractor will be responsible for controlling all alien invasive species, as per the requirements of the Conservation of Agricultural Resources Act (CARA), during the contract and vegetation establishment period;	<p>Medium densities of alien invasive species were noted across all sites.</p>	<p>It is recommended that existing alien invasive management plans be amended to ensure efficiency or that stricter implementation be maintained.</p> <p>This is to be corrected by the 31st of March 2025.</p>	<b>CLOSED</b> Eradication of alien and invasive species is underway.
<b>EMPR- 6.3.6 Management of storage and handling of hazardous material</b>  Areas for the storage of fuel and other flammable materials shall comply with standard fire safety regulations;	<p>Fire extinguishers that were past the service date were located at a campsite.</p>	<p>Fire extinguishers must be serviced annually. Overdue fire extinguishers must be removed from the site.</p> <p>This is to be corrected by the 31st of March 2025.</p>	<b>CLOSED</b> Service records of all fire extinguishers on-site are up-to-date.



## 5.2 COMPLIANCE SUMMARY FOR CURRENT AUDIT

Eskom's Kendal Power Station ADF is **98.2%** compliant with the overall management measures of the EMPr and the conditions of the IEA. There is a total of 553 conditions stipulated across the IEA and EMPr. Eskom's Kendal ADF is fully compliant with 279 conditions. Five non-compliances were recorded for this audit. The remaining 33 conditions were for noting purposes, and 236 conditions did not apply to the activities occurring on-site at the time of this audit. The summary of the compliance score for each checklist is given in Table 5 and the overall compliance is given in Table 6. A graphic representation of the overall compliance score for the IEA conditions is presented in Figure 2.

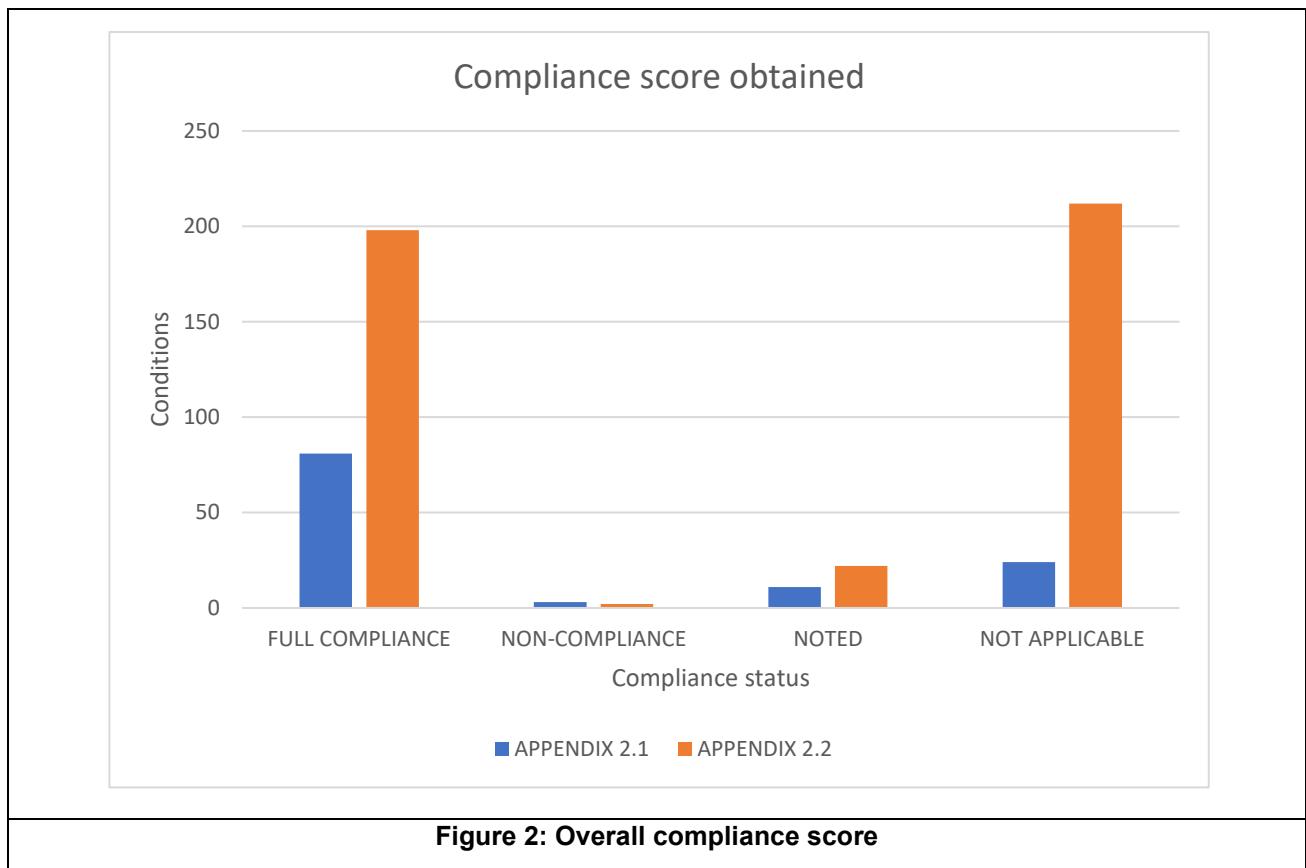
**Table 5: Summary of Compliance for Each Checklist in Appendix 2**

	Compliant (1)	Non-compliance (0)	For Noting	Not Applicable (N/A)	Total number of Conditions	Compliance status (%)
Appendix 2.1 (IEA)	81	3	11	24	<b>119</b>	<b>97.6</b>
Appendix 2.2 (EMPr)	198	2	22	212	<b>434</b>	<b>97.5</b>
<b>Overall Total</b>	<b>279</b>	<b>5</b>	<b>33</b>	<b>236</b>	<b>553</b>	<b>98.2</b>

**Table 6: Overall Summary of IEA Compliance**

STATUS	TOTAL COUNT	SCORE	WEIGHTING
Full Compliance	279	1	279
Non-Compliance	5	0	0
For noting only	33	-	-
Not Applicable	236	-	-
<b>Maximum obtainable Total</b>	<b>284</b>		<b>279</b>
			<b>98.2%</b>





### 5.3 FINDINGS OF CURRENT AUDIT

The tables below provide a summary of non-compliances recorded for EMPr and IEA appendixes. Recommendations for each finding have been provided. These recommendations can assist Eskom in improving its overall compliance score.

**Table 7 Audit Findings Made Against IEA Conditions**

CONDITION	FINDING	RECOMMENDATION
<p>17.1 Environmental auditing and reporting</p> <p>17.1.1 Internal audits must be conducted quarterly by the holder of the environmental authorisation in order to audit compliance with conditions related to this environmental authorisation and the approved EMPr, and on each audit occasion an official report must be compiled by the relevant auditor to report the</p>	<p>The most recent audit report provided was for September 2024. There was no internal audit report for 2025 during the time of the external audit.</p>	<p>The Licence Holder is advised to finalise the internal report by 30/08/2025 and another report by 30/10/2025.</p> <p>Since this is a recurring finding, an NCR must be issued.</p>



CONDITION	FINDING	RECOMMENDATION
findings of the audits, which must be made available to the external auditor specified in condition below.		
17.1.1 Seven pairs of monitoring boreholes must be drilled around the proposed continuous ash disposal facility. The holder of authorisation must conduct monthly monitoring of groundwater levels, groundwater quality as indicated in condition 17.6.4 purged groundwater sampling and the analytical suite for groundwater samples including determinants as per existing Water Use License (License no: 04/B20E/BCEGI/1048).	<p>Monitoring boreholes have been drilled as required; however, monthly groundwater quality monitoring has not been conducted since February 2025.</p>	<p>Groundwater monitoring is to be conducted monthly as per the EA.</p> <p>This is to be addressed by 30 September 2025.</p>
17.1.2 Detection Monitoring Groundwater and surface water quality monitoring must be conducted – (a) for variables listed in Annexure III – annually or such frequency as may be determined by the competent authority.	<p>Several exceedances were recorded in the latest (January 2025 and February 2025) water quality monitoring reports.</p> <p>The latest water quality monitoring reports provided were those of January 2025 and February 2025. No water quality monitoring reports have been produced since then.</p> <p><u>Surface Water Monitoring:</u></p> <p>An assessment of the recordings was conducted upstream and downstream to determine the contribution the facility</p>	<p>Investigations must be carried out to identify the causes of the exceedances and this must be addressed efficiently as per recommendations made in the water quality monitoring reports complied by water quality specialists.</p> <p>Plan and commitment for investigation must be submitted to DFFE and DWS by 30/09/2025</p> <p>The IEA Holder indicated that the surrounding land use activities contribute to the readings reported. It is recommended that the IEA Holder consult with DWS in this regard and apply for an amendment to consider these factors if they were erroneously</p>



CONDITION	FINDING	RECOMMENDATION
	<p>has to the readings recorded. Exceedance was noted where the readings increased from those recorded upstream.</p> <p>The following exceedances were noted downstream of the sites</p> <ul style="list-style-type: none"> <li>• LEE02 – SO<sub>4</sub>, Na</li> <li>• CSW03 – Mn, E. coli</li> </ul> <p><u>Groundwater</u></p> <p><u>Monitoring:</u></p> <p>The are no groundwater monitoring points upstream of the ADF. Exceedances were recorded for the following parameters:</p> <ul style="list-style-type: none"> <li>• ADFBH1 – S: SO<sub>4</sub></li> <li>• ADFBH2 – D: F</li> <li>• ADFBH2 – S: F, Mn</li> <li>• ADFBH3 – D: Mn</li> </ul> <p>ADFBH3 – S: SO<sub>4</sub>, Mn, B</p>	<p>omitted in consideration of the limits stipulated.</p> <p>This is a recurring finding.</p> <p>Action to address the finding is to be initiated by 30 November 2025</p>



**Table 8 Audit Findings Made Against Management Measures of the EMPr**

<b>MANAGEMENT MEASURES</b>	<b>FINDING</b>	<b>RECOMMENDATIONS</b>
<b>4.1. Wetland Monitoring</b>		
Monitor dust deposition within the surrounding environment;	There were no dust monitoring reports available during this audit. The last dust monitoring report made available is dated April 2025.	Dust monitoring is not conducted as per EMPr.  This finding is to be addressed by the 30 <sup>th</sup> of September 2025.
<b>4.2 Air Quality</b>		
Due to the location of the ash disposal facility in the Highveld Priority Area (Section 3.2.1) and the already elevated concentrations of airborne particulates, it is recommended that PM concentrations be monitored near the ash disposal facility. The nearest possible, secure, location to the following point: 26° 0527.39"S; 28°5453.68"E. Because of the active nature of the ash disposal facility, it is feasible to use a mobile unit for this additional Pi monitor.	There were no dust monitoring reports available during this audit. The last dust monitoring report made available is dated April 2025.	Dust monitoring is not conducted as per EMPr.  This finding is to be addressed by the 30th of September 2025.
Dust fallout monitoring should be conducted, in the direction of the prevailing winds and co- located, where possible, at sensitive receptors within the zone of highest Impact.	There were no dust monitoring reports available during this audit. The last dust monitoring report made available is dated April 2025.	Dust monitoring is not conducted as per EMPr.  This finding is to be addressed by the 30th of September 2025.



## 6. RECOMMENDATIONS AND CONCLUSION

The IEA Holder obtained an overall score of 98.2%, which is an improvement from the previous score of 97.5%. Areas of concern include recurring findings that could have been easily addressed by internal processes. These include failure of the IEA Holder to produce internal audit reports and dust fallout monitoring reports.

The complexity of investigating sources of underground water pollution in the project area is acknowledged, given that the site is surrounded by mining activities and agricultural farming that rely heavily on the use of chemical fertilizers. Nonetheless, the IEA Holder is advised to appoint a qualified service provider to investigate sources of pollution as prescribed in the IEA.

The Quantity Assurer, Supervising Engineer and ECO for the project are all from one company. This was flagged to the IEA Holder as an area that could potentially compromise the independence of the ECO.

It can be concluded that the EMPR is sufficient to mitigate the environmental impacts of the project on the environment. The IEA Holder is commended for the improvement and encouraged to close all open findings within the recommended timeframe.



## 7. APPENDICES



## APPENDIX 1: ATTENDANCE REGISTERS



## APPENDIX 2: COMPLIANCE AUDIT CHECKLISTS



## APPENDIX 2.1: CHECKLIST FOR INTEGRATED ENVIRONMENTAL AUTHORISATION

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME																																																																								
<b>SCOPE OF AUTHORISATION</b>																																																																											
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<p>3.2 Authorisation of the activities is subject to the coordinates contained in this authorisation, which form part of the environmental authorisation and are binding on the holder of environmental authorisation</p>	1	Activities are taking place at the coordinates stipulated in the IEA.																																																																									

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
3.3 The Department shall by written notice to the holder of an authorisation suspend with immediate effect an environmental authorisation if suspension of the authorisation is necessary to prevent harm or further harm to the environment	-	This condition is noted. To date, the Department has not issued any written notice of suspension of the IEA to the holder.	
3.4 The activities must commence within a period of five (5) years from the date of issue. If commencement of activities does not occur within that period, the environmental authorisation lapses and new application for environmental authorisation must be made for the activities to be undertaken. Commencement with one activity listed in terms of this authorisation constitutes commencement of all authorised activities.	1	Activities commenced within the stipulated 5-year period. The IEA was granted on the 28 <sup>th</sup> of July 2015 and activities commenced on the 7 <sup>th</sup> of July 2020. Proof of notification of commencement is available.	
3.5 The holder of the environmental authorisation shall be responsible for ensuring compliance with the conditions contained in this environmental authorisation. This includes any person acting on the holder's behalf, including but not limited to, an agent, servant, contractor, sub-contractor, employee, consultant, or person rendering a service to the holder of the authorisation.	1	Two ECOs have been appointed to ensure compliance with the conditions of the IEA. The ECOs oversee all the	

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
		subcontractors and their respective EO's.	
3.6 Any changes to, or deviations from, the project description set out in this authorisation must follow the amendment processes as prescribed in chapter 4 (Parts 1-3) of the NEMA EIA regulations 2010 and be approved, in writing by, the Department before such changes or deviations may be effected. In assessing whether to grant such approval or not, the Department may request such information as it deems necessary to evaluate the significance and impacts of such changes or deviations and it may be necessary for the holder of the authorisation to apply for further authorisation in terms of the regulations	1	Design changes from the initial IEA were submitted and approved by the Department. Proof of submission and approval is available.	
NOTIFICATION OF AUTHORISATION AND RIGHT TO APPEAL			
4.1 The holder of authorisation must notify every registered interested and affected party, in writing and within Twelve (12) Calendar days of the date of this environmental authorisation, of the decision to authorise the activity.	1	IAPs were notified through emails and newspaper advertising.	
4.2 The notification must-			
4.2.1 specify the date on which authorisation was issued;	1	Notifications included the required information.	

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
4.2.2 inform the interested and affected party of the appeal procedure provided for in chapter 7 of the Environmental Impact Assessment Regulation, 2010;	1	Notifications included the required information.	
4.2.3 4.2.3 advise the interested and affected party that a copy of the authorisation will be furnished on request; and	1	Notifications included the required information.	
4.2.4 give the reasons for the decision.	1	Notifications included the required information.	
4.3 The holder of authorisation must publish a notice-	1	IAPs were notified through emails and newspaper advertising.	
4.3.1 informing interested and affected parties of the decision;	1	Notifications included the required information.	
4.3.2 informing interested and affected parties where the decision can be accessed; and	1	Notifications included the required information.	
4.3.3 drawing the attention of interested and affected parties to the fact that an appeal may be lodged against this decision in the newspaper(s) contemplated and used in terms of regulation 54(2)(c) and (d) and which newspaper was used for the placing of advertisements as part of the public participation process.	1	Notifications included the required information.	

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
4.4 The holder of the authorisation must, in writing, within 12 days of the date of the decision on the application-	1	IAPs were notified through emails and newspaper advertising.	
(a) notify all registered interested and affected parties of -	1	Notifications included the required information.	
(i) the outcome of the application; and			
(ii) the reasons for the decision;	1		
(b) draw attention of all registered interested and affected parties to the fact that an appeal may be lodged against the decision in terms of chapter 7 of the NEMA EIA regulations, 2010 if such appeal is available in the circumstances of the decision;			
(c) draw the attention of all interested and affected parties to the matter in which they can access the decision; and	1	Notifications included the required information.	
(d) publish a notice-	1	IAPs were notified through emails and newspaper advertising.	
i. informing interested and affected parties of the decision;	1	Notifications included the required information.	
ii. information interested and affected parties where the decision can be accessed; and			

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
iii. drawing the attention of interested and affected parties to the fact that an appeal may be lodged against the decision in terms of chapter 7 of the NEMA EIA Regulations, 2010, if such appeal is available under the circumstances of the decision; in the newspapers contemplated in regulation 54 (2)(C) and (d) of the NEMA EIA Regulations, 2010 and which newspaper was used for the placing of advertisements as part of the public participation process.			
<b>MANAGEMENT OF THE ACTIVITY</b>			
5.1 The Environmental Management Programme (EMPr) submitted as part of the Application for the IEA is hereby approved. This EMPr must be implemented and adhered to	1	An amendment of the approved EMPr was submitted and approved in 2021. The management actions of the EMPr are communicated to all contractors through environmental inductions. Compliance is	

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
		monitored monthly by external ECOs.	
5.2 Should there be changes in the operation and management of the authorised activities, the EMPr must be amended to accommodate those changes and be submitted to this Department for written approval before implementation incorporated as part of the EMPr. Once approved, the EMPr must be implemented and adhered to.	1	The amended EMPr accommodates activities taking place on-site.	
5.3 The approved EMPr and operational EMPr for the disposal facility must be implemented and strictly enforced during all phases of the project. It shall be seen as a dynamic document and shall be included in all contract documentation for all phases of the development.	1	The approved EMPr is implemented strictly. Compliance monitoring and inductions are put in place to ensure strict adherence to the EMPr.	
5.4 Changes to the EMPr and operational EMPr for the disposal facility which are environmentally defendable, shall be submitted to this Department for acceptance before such changes could be effected.	1	An amendment of the initial EMPr was approved by the Department in 2021.	
5.5 The Department reserves the right to request amendments to the EMPr and operational EMPr for the disposal facility should any impacts that were not anticipated or covered in the EIR be discovered.	-	This condition is noted. The Department has not yet requested an	

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
		amendment of the approved EMPr.	
5.6 The provision of the approved EMPr and the operation EMPr for the disposal facility including the mitigation measures identified in the EIR and specialist' studies shall be an extension of the conditions of this IEA and therefore noncompliance with them would constitute non-compliance with the IEA.	-	This condition is noted. Compliance monitoring of the mitigation measures of the EMPr is strictly monitored by the appointed ECOs.	
5.7 The effluent management system must be managed and operated-	1	Eskom's Environmental Management System (EMS) is in place to keep a record of potential risks, incidents, and complaints. No complaints have been recorded during this audit period. In addition, all contractors have a designated ECO responsible for identifying and noting any incidents on their respective sites.	

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
5.7.1 In accordance with an Environmental Management System, that inter alia identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents and non-conformances and those drawn to the attention of the holder of the environmental authorisation as a result of complaints;			
5.7.2 By sufficient persons who are competent in respect of the responsibilities to be undertaken by them in connection with the operation of the activities.			
5.8 The holder of authorisation must maintain and ensure continued functioning of a monitoring committee for the normal operative lifetime of the site operational process and for a period of at least two years after the closure of the site, or at such longer periods as may be determined by the Director.	N/A	The project has not yet reached the operational phase. No monitoring committee is in place.	
5.9 The monitoring committee must formulate terms of reference and code of conduct, according to the minimum Requirements, Second Edition 1998 by Department of Water Affairs and Forestry.	N/A	The project has not yet reached the operational phase. No monitoring committee is in place.	
5.10 The monitoring committee must be comprised of relevant interested and affected parties.	N/A	The project has not yet reached the operational phase. No monitoring committee is in place.	

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
5.11 The monitoring committee must meet at least twice a year and not later than 30 days after the external audit report specified in condition 17.4.2 has been submitted according to condition 17.4.2. (d)	N/A	The project has not yet reached the operational phase. No monitoring committee is in place.	
5.12 The holder of authorisation must keep minutes of all the meetings of the Monitoring Committee and distribute these minutes to all members of the Monitoring Committee within 14 days after the meeting.	N/A	The project has not yet reached the operational phase. No monitoring committee is in place.	
<b>ENVIRONMENTAL CONTROL OFFICER (ECO)</b>			
6.1 The holder of this authorisation must appoint an independent Environmental Control Officer (ECO) with experience or expertise in the field for the construction phase of the development. The ECO will have the responsibility to ensure that the conditions referred to in this authorisation are implemented and to ensure compliance with the provisions of the EMPr.	1	Due to the large extent of the scope of work, Eskom appointed two independent ECOs from Zitholele. The independent ECOs monitor compliance with the IEA and EMPr.	The independence of the ECOs was flagged to the management of Eskom, given that the Quantity Surveyor and the Supervising Engineer for the development are also from Zitholele.
6.2 The ECO must be appointed before commencement of any authorised activity.	1	The ECOs were appointed before the commencement of activities.	

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
6.3 Once appointed, the name and contact details of the ECO must be submitted to the Director: Compliance Monitoring of the Department.	1	The details of the appointed ECOs were submitted to the Director: Compliance Monitoring of the Department.	
6.4 The ECO must remain employed until all rehabilitation measures, as required for implementation due to construction damage, are completed and the site is ready for operation.	-	This condition is noted. The ECOs have remained employed from the commencement of the works to date. The company contracted for compliance monitoring has been replaced, however, one of the ECOs was retained by the new company.	
6.4.1 The ECO must-			
6.4.2 Keep record of all activities of the site. Problems identified, transgression noted and a schedule of tasks undertaken by the ECO	1	The ECOs keep a record of all activities of the site. Any problems identified and transgressions are	

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
		noted. The ECO also keeps a schedule of tasks they undertake.	
6.4.3 Keep and maintain a detailed incident (including spillage of bitumen, fuels, chemicals, or any other material) and complaint register on-site indicating how these issues were addressed, what rehabilitation measures were taken and what preventative measures were implemented to avoid re-occurrence of incidents/complaints.	1	Incident and complaints registers are maintained. The outcomes and mitigation measures of the recorded incidents are also noted.	
6.4.4 Keep and maintain a daily site diary	1	A daily site diary is kept.	
6.4.5 Keep copies of all reports submitted to the Department.	1	Copies of all reports are stored electronically.	
6.4.6 Keep and maintain a schedule of current site activities including the monitoring of such activities.	1	A schedule of activities taking place on-site is maintained by the ECOs.	
6.4.7 Obtain and keep record of all documentation, permits, licences and authorisations such as waste disposal certificates, hazardous waste landfill site licenses etc. required by this facility.	1	All records were provided. This includes permits, authorisations, and waste disposal slips. Each contractor maintains their waste	

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
		disposal records and submits them to the ECOs during audits.	
6.4.8 Compile a monthly report	1	Monthly reports are compiled by the ECOs.	
Waste Management Control Officer (WMCO)			
7.1 The applicant must designate a Waste Management Control Officer (WMCO) in writing, who will monitor and ensure compliance and correct implementation of all conditions and provisions as stipulated in the environmental authorisation and approved EMPr related to the ash disposal facility.	1	The ECOs' scope of works is inclusive of waste management activities; therefore, they serve as WMCOs for the project.	
7.2 The WMCO must report any non-compliance with any environmental authorisation conditions or requirements or provisions of NEMWA to the Department through the means reasonably available.	1	Non-compliances are reported and addressed through monthly compliance monitoring.	
7.3 The duties and responsibility of the WMCO should not be seen as exempting the holder of the environmental authorisation from the legal obligations in terms of the NEMWA.	-	This condition is noted.	
RECORDING AND REPORTING TO THE DEPARTMENT			

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
8.1 The holder of the authorisation must keep all records relating to monitoring and auditing on site and make it available for inspection to any relevant and competent authority in respect of this development.	1	All monitoring and audit reports are stored electronically and are easily accessible for inspections and external audits.	
8.2 All records and /or reports required or resulting from activities relating to this environmental authorisation must:	1	All related amendments are legible and easily retrievable.	
8.2.1 be legible;			
8.2.2 be submitted as required and must form part of the external audit report;			
8.2.3 if amended, the record and /or report must be amended in such a way that the original and any subsequent amendments remain legible and are easily retrievable; and			
8.2.4 be retained in accordance with documented procedures which are approved by the department.			
8.3 All documents e.g. audit/monitoring/compliance reports and notifications, required to be submitted to the Department in terms of this authorisation, must be submitted to the Director: Compliance and Monitoring at the Department.			

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
8.4 Records demonstrating compliance with conditions of this IEA must be maintained for five years.	1	Previous records demonstrating compliance with this IEA have been maintained on Eskom's EMS system.	
8.5 The holder of the environmental authorisation must keep records and update all the information referred to in Annexure II and submit this information to the Department on an annual basis.	1	The IEA keeps records and updates on all the information referred to in Annexure II	
<b>ENVIRONMENTAL AUDIT REPORT FOR CONSTRUCTION</b>			
9.1 The holder of the authorisation must submit an environmental audit report to the Department within 30 days of completion of the construction phase (i.e. within 30 days of site handover) and within 30 days of completion of rehabilitation activities.	N/A	The construction phase has not yet been completed.	
9.2 The environmental audit report must:			
9.2.1 Be compiled by an independent environmental auditor;	1	Independent ECOs compile monthly audit reports.	
9.2.2 Indicate the date of the audit, the name of the auditor and the outcome of the audit;	1	Audit reports indicate the date of the audit, the	

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
		auditor and the outcome of the audit.	
9.2.3 Evaluate compliance with the requirements of the approved EMPr and this environmental authorisation;	1	The audits conducted evaluate the compliance to the requirements of the approved EMPr and the IEA.	
9.2.4 Include measures to be implemented to attend to any non-compliance or degradation noted;	1	Reports include measures that are to be implemented to address non-compliance.	
9.2.5 Include copies of any approvals granted by other authorities relevant to the development for the reporting period;	1	Approvals related to the project are referenced in the reports and are available upon request.	
9.2.6 Highlight any outstanding environmental issues that must be addressed, along with recommendations for ensuring these issues are appropriately addressed;	1	Outstanding environmental issues are highlighted and recommendations are made.	

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
9.2.7 Include a copy of this authorisation and the approved EMPr;	1	Approvals related to the project are referenced in the reports and are available upon request.	
9.2.8 Include all documentation such as waste disposal certificates, hazardous waste landfill site licenses etc. pertaining to this authorisation; and	1	All documentation were provided. This includes permits, authorisations, and waste disposal slips. Each contractor maintains their waste disposal records and submits them to the ECOs during audits.	
9.2.9 Include evidence of adherence to the conditions of this authorisation and the EMPr where relevant such as training records and attendance records.	1	Photographic records and evidence of compliance is included in the reports.	
<b>COMMENCEMENT OF ACTIVITIES</b>			
10.1 The authorised activity shall not commence within twenty (20) days of the date of signature of the authorisation.	1	No activities commenced within 20 days of the	

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
		signing of the authorisation.	
10.2 An appeal under section 43 of the National Environmental Management Act (NEMA), Act 107 of 1998 (as amended), suspend an environmental authorisation or exemption. Or any provisions or conditions attached thereto.	N/A	No appeals against the granting of the IEA were received.	
10.3 Should you be notified by the Minister of a suspension of the authorisation pending appeal procedures, you may not commence with the activity until such time that the Minister allows you to commence with such an activity in writing	N/A	The IEA has not been suspended to date.	
10.4 The holder of this authorisation must obtain a Water Use License from the Department of Water Affairs (DWA) prior to the commencement of the project should the holder impact on any wetland or water resource. A copy of the license must be submitted to the Chief Director: Integrated Environmental Authorisations at the Department	1	Water uses within the facility are licenced under the following WULs: -Licence No. 06/B20E/CGIJ/15283, dated 30/10/2024 -License No. 04/B20E/ABCEGI/3888 dated 08 August 2018 -Licence No. 04/B20E/ABCEGI/3888 Dated 18/08/2017	

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
10.5 The holder of the authorisation must obtain Atmospheric Emission License from relevant authority prior to commencement of the project should the project trigger listed activities in terms of the National Environmental Management: Air Quality Act 39 of 2004. The copy of the license obtained must be included in the first audit submitted to the Department.	1	An AEL has been granted for the project.	
<b>NOTIFICATION TO AUTHORITIES</b>			
11.1 Fourteen (14) days written notice must be given to the Department that the activity will commence. Commencement for the purposes of this condition include site preparation. The notice must include a date on which it is anticipated that the activity will commence. This notification period may coincide with the Notice of Intent to Appeal period, within which construction may not commence.	1	The Department was notified prior to the commencement of activities. The notice included the anticipated date of commencement.	
11.2 After construction of the site or further development within the site, the IEA holder shall notify the Responsible Authority thereof and the person referred to in condition 2.5 shall submit a certificate or alternatively a letter to the Responsible Authority that the construction of the site or further development within the site, as proposed by the IEA holder and approved by the Responsible authority is in accordance with the recognised civil engineering practice and the requirements in this IEA before disposal may commence on the site. If the Responsible	N/A	The project is still in the construction phase.	

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
Authority is satisfied with the construction of the site or any further development within the site and has given written permission, the IEA holder may use the site or any further development within the site for the disposal of waste.			
<b>OPERATION OF THE ACTIVITY</b>			
12.1 Fourteen (14) days written notice must be given to the Department that the activity operational phase will commence.	N/A	The project is in the construction phase. Operation has not yet commenced.	
12.2 The holder of this authorisation must compile an operational EMPr for the operational phase of the activity or alternatively, if the holder has an existing operational environmental management system, it must be amended to include the operation of the authorised activity	N/A	The project is in the construction phase. Operation has not yet commenced.	
<b>SITE CLOSURE AND DECOMMISSIONING</b>			
13.1 Should the activity ever cease or become redundant, the applicant shall undertake the required actions as prescribed by legislation at the time and comply with all relevant legal requirements administered by any relevant and competent authority at that time.	N/A	The project is in the construction phase. No site closure or decommissioning has occurred.	
<b>LEASING AND ALIENATION OF THE SITE</b>			

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
14.1 Should the holder of the environmental authorisation want to alienate or lease the site, he/she shall notify the Department in writing of such an intention at least 120 days prior to the said transaction. Should the approval be granted, the subsequent holder of the environmental authorisation shall remain liable to compliance with all license conditions.	-	This condition is noted. The site has not been leased to date.	
<b>TRANSFER OF ENVIRONMENTAL AUTHORISATION</b>			
15.1 Should the holder of the environmental authorisation transfer holder ship of this environmental authorisation due to a change of ownership [as provided for in terms of S24E(c) of NEMA], he/she must apply in terms of Section 52 of NEMWA.	-	This condition is noted. No transfer of the IEA has taken place to date.	
15.2 Should the transfer of holder ship of this environmental authorisation mentioned above be for any reason other than the change of ownership in the property, the holder of this environmental authorisation must inform the Department of any change in ownership in the property and must request an amendment to this amendment authorisation to reflect such change in ownership.	N/A	No transfer of the IEA has taken place to date.	
15.3 Any subsequent holder of an environmental authorisation shall be bound by conditions of this environmental authorisation.	N/A	No transfer of the IEA has taken place to date.	
<b>INVESTIGATIONS</b>			
16.1 If in the opinion of the Department, pollution, nuisances or health risks may be or are occurring on the site, the holder of the	-	The Department has not raised concerns of	

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
environmental authorisation must initiate an investigation into the cause of the problem or suspected problem, including such investigations as identified by the Department related to the risks posed. Such investigation must include the monitoring of water quality variables at those monitoring points and at such frequency as may be in specified by Director: Department of Water and Sanitation.		pollution, nuisance or health risks occurring on-site to date.	
16.2 Should the investigation carried out as per condition 16.1 above reveal any acceptable levels of pollution, the holder of the environmental authorisation must submit mitigation measures to the satisfaction of the relevant Department.	N/A	The Department has not raised concerns of pollution, nuisance or health risks occurring on-site to date.	
SPECIFIC CONDITIONS RELATED TO THE DISPOSAL FACILITY			
17.2 Site Security and Access Control 17.2.1 The holder of the environmental authorisation must ensure effective access control to the effluent management system to prevent unauthorised entry. Waterproof, durable and legible signs in at least three official languages applicable in the area must be displayed at each entrance to the site. The signs must indicate the risks involved in entering the site as well as the person responsible for the operation of the site.	1	Strict access control is present throughout the site (Figure 3. Waterproof and legible signs were also noted on all sites during the audit.	
17.3 Permissible waste	N/A	The site is not yet operational; therefore, no	

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
17.3.1 Any portion of the site which has been constructed or developed according to the Class C containment barrier design in terms of Regulation 636, National Norms and Standards for the Disposal of Waste to Landfill, dated 23 August 2013 and approved in writing by the competent authority may be used for the disposal of waste classified as Type 3 waste according to Regulation 634, Waste Classification and Management Regulations, dated 23 August 2013.		waste has been deposited to this facility to date.	
17.3.2 Any portion of the site which has been constructed or developed according to condition 17.3 may be used for the disposal of ash waste.	N/A	The site is not yet operational; therefore, no waste has been deposited to date.	
17.4 Construction and commissioning 17.4.1 Construction and further development within the proposed waste disposal site must be carried out under the supervision of a registered Professional Engineer. Any development on the site must adhere to a class C containment barrier design as described in Regulation 636, National Norms and Standards for Disposal of Waste to Landfill dated 23 August 2013. The design drawings must be approved in writing by the competent authority before construction may commence.	1	All developments are undertaken under the supervision of Franco Giorgio Small (Reg No. 20170153). Franco Giorgio Small is a registered professional engineer with ECSA.	

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
17.4.2 The holder of the authorisation must ensure that that construction Quality Assurance (CQA) takes place during construction and geosynthetic material must comply with relevant south African National Specifications, or any prescribed management practice or standards which ensure relevant performance. Details of quality assurance during construction must be provided; this must also include conformation that construction will be supervised by a registered professional engineer.	1	Zitholele Consulting has been appointed to conduct Construction Quality Assurance (CQA) on the project.	
17.4.3 After construction of the site or further development within the site, the holder of environmental authorisation must notify the competent authority thereof and the registered professional engineer must submit a certificate or alternatively a letter to the competent authority that the construction of the site or further development within the site, as proposed by the holder of the authorisation and approved by the competent authority, is in accordance with recognised civil engineering practice and the requirements in the licence, before disposal may commence on the site. If the competent authority is satisfied with the construction of the site or any further development within the site and has given written permission, the holder of authorisation may use the site or any further development within site for the disposal of waste.	N/A	The project is still in the construction phase.	
17.4.4 Works must be constructed and maintained on a continuous basis by the holder of environmental authorisation to divert and drain from	1	The approved design report for the Pollution	

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
the site in a legal manner, all runoff water arising on land adjacent to the site, which could be expected as a result of the estimated maximum precipitation during period of 24 hours with an average frequency of once in 50 years (hereinafter referred to as the "estimated maximum precipitation"). Such works must, under the said rainfall event, maintain a freeboard of 800mm.		Control Dam (PCD) and Clean Water Dam (CWD) considered the estimated maximum precipitation levels to ensure the maintenance of an 800mm freeboard at all times.	
17.4.5 Works must be constructed and maintained on a continuous bases by the holder of authorisation to divert and drain from the working face of the site, all runoff water arising on the site, which could be expected as a result of the estimated maximum precipitation and to prevent such runoff water from coming into contact with leachate from the site. Such works, must, under the said rainfall event, maintain freeboard of 800m and be lined to the satisfaction of the competent authority, to prevent pollution to groundwater.	1	The approved design report for the Pollution Control Dam (PCD) and Clean Water Dam (CWD) considered the estimated maximum precipitation levels to ensure the maintenance of an 800mm freeboard at all times.	
17.4.6 Runoff water referred to in condition 17.3.5. must comply with the quality requirements of the General and Special standard, prescribed in terms of section 21 (1)(a) of the Water Act, 1956 (Act 54 of 1956) as published in Government Notice 991 of 18 May	1	Runoff water, which has been deemed as "dirty water" coming from the site, is contained and not	

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
1984, or with such quality requirements as may from time to time be determined by the competent authority and must be drained from the site in a legal manner.		released during this auditing period. However, the WUL granted for the project addresses the release/drainage of water with acceptable water quality parameters from the site.	
17.4.7 Runoff water referred to in Condition 17.3.6 which does not comply with the quality requirements applicable in terms of Condition 17.3.6 and all sporadic leachate from the Site must, by means of works which must be constructed and maintained on a continuous basis by the holder of authorisation and be lined as approved by the competent authority, to prevent pollution to groundwater -		This condition is noted. Construction is currently underway.	
(i) be treated to comply with the aforementioned standard and discharged in a legal manner; and/or		No treatment of water has occurred.	
(iii) be evaporated in lined dams as approved by the competent authority; and/or I be discharged into any convenient sewer if accepted by the authority in control of that sewer.		No water is being discharged from the site. Liner installation and expansion is currently underway	

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
17.4.8 The site must be constructed in accordance with recognised civil engineering practice to ensure that it remains stable.	1	<p>The site is constructed in accordance with recognised civil engineering practises; under the approval of a registered professional engineer.</p> <p>CQA has been conducted to ensure the standard is maintained.</p>	
17.4.9 The slope of the sides of the Site must be constructed in such a manner that little or no erosion occurs.	1	<p>No erosion was noted on any of the slopes on-site.</p>	
17.4.10 The IEA holder must ensure that the storage areas have a firm, waterproof base and drainage system. It must be designed and managed so that there is no escape of contaminants in the environment. All runoff must be prevented from entering local watercourses, including wetlands.	1	<p>The storage areas are lined with a class C liner as per the approved designs. No escape of contaminants has been recorded to date.</p>	
17.4.11 The IEA holder must ensure that the integrity of the waterproof base and walls are routinely monitored and corrective action taken before containment integrity is breached.	N/A	<p>This will be monitored during operations. Leak detection and water</p>	

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
		quality analyses will assist in determining the integrity of the waterproof base.	
17.4.12 Any development which occurs within 1:100-year flood line and/or within 500m from the boundary of wetlands would require a water use licence in terms of section 40 of the National Water Act, 1998.	1	A WUL was granted for the project in this regard.	
17.5 Environmental auditing and reporting 17.5.1 Internal audits  (a) must be conducted quarterly by the holder of the environmental authorisation in order to audit compliance with conditions related to this environmental authorisation and the approved EMPr, and on each audit occasion an official report must be compiled by the relevant auditor to report the findings of the audits, which must be made available to the external auditor specified in condition below.	0	Eskom undertakes quarterly internal audits. The most recent audit report provided was for September 2024. There was no internal audit report for 2025 during the time of the external audit.	
17.5.2 External Audits  (a) The holder of the environmental authorisation and approved EMPr must appoint an independent external auditor to audit the power plant biannually subject to the environmental authorisation and this auditor must compile an audit report	1	An external auditor is appointed to monitor compliance biannually. The most recent biannual audit was conducted	

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
documenting the findings of the audit, which must be submitted by the holder of the environmental authorisation.		Green Gold Group (Pty) Ltd in February 2025.	
(b) The auditor must-			
(i) Specifically state whether conditions and requirements related to this environmental authorisation are adhered to;	1	The audit report clearly states the level of compliance with conditions and requirements.	
(ii) Include an interpretation of all available data and test results regarding the operation of the site and all its impacts on the environment;	1	This requirement is met in the audit report.	
(iii) Specify target dates for the implementation of the recommendations by the holder of the environmental authorisation to achieve compliance;	1	This requirement is met in the audit report.	
(iv) Contain recommendations regarding non-compliance or potential noncompliance and must specify target dates for the implementation of	1	This requirement is met in the audit report.	

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
the recommendations by the holder of the environmental authorisation and whether corrective action taken for the previous audit non conformities was adequate;			
(v) Show results graphically and conduct trend analysis; and	1	This requirement is met in the audit report.	
(vi) Include the information required in Annexure II.	1	This requirement is met in the audit report.	
(c) Each external audit report referred to in condition 17.4.2 must be submitted to the Department within 30 days from the date on which the external auditor finalised the audit.	1	Biannual reports are submitted to the Department within 30 days of the finalisation of the audit report.	
17.5.3 Reporting  (a) The holder of the environmental authorisation must, within 24 hours, notify the Director of the occurrence or detection of any incident on the site, or incidental to the operation of the site, which has the potential to cause, or has caused pollution of the environment, health risks, nuisance conditions or water pollution.	1	All incidents are recorded. A minor spillage occurred during 29 <sup>th</sup> July site visit. The spillage was cleaned according to the approved method	

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
		statement and a flash report generated. Figure 4	
(b) The holder of the environmental authorisation must, within 14 days inform the Department from the occurrence or detection of any incident referred to in condition 16.1, must within 14 days period of time specified by the Department submit an action plan, which must-	N/A	No major incidents were noted during the auditing period.	
(i) Correct the impact resulting from the incident;			
(ii) Prevent the incident from causing any further impact; and			
(iii) Prevent a recurrence of a similar incident to the satisfaction of the Department.			
(c) In the event that measures have not been implemented within 21 days of the incident, or within the time period identified by the Department, or the measures which have been implemented are inadequate, the Department may implement the necessary measures at the cost and risk of the holder of the environmental authorisation.	N/A	No major incidents were noted during the auditing period.	
(d) The holder of the environmental authorisation must keep an incident report and complaints register, which must be made available to the external auditor, representatives of this	1	An incident register is maintained and made available during audits.	

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
Department and Department of Water and Sanitation for the purpose of audit.		Minor incidents are also recorded in the ECO reports.	
(e) The Department must be notified as soon as the holder of this environmental authorisation becomes aware of the following incidents:		This condition is noted. No major incidents of this nature have been reported during this audit period.	
(i) Any malfunction, breakdown or failure of equipment or techniques, accident or fugitive emission which has caused, is causing or may cause significant pollution;			
(ii) The breach of this environmental authorisation; and			
(iii) Any significant adverse environmental and health effects.			
17.6 General operations and impact management of waste management activities 17.6.1 Waste, which is not sewage from the authorised development, must be dealt with according to relevant legislation or the Department's policies and practices.	1	Waste is separated from the source at all sites. Each contractor is responsible for waste management at their	

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
		respective sites. The independent ECOs monitor compliance.	
17.6.2 The holder of environmental authorisation must prevent spillages. Where the spillages occur, the holder of authorisation must ensure the effective and safe cleaning of such spillages.	1	A minor spillage that was observed was cleaned up. The source of spillage was identified as a burst pipe underneath the TLB. The TLB was immediately taken out of operation for fixing. Figure 4	
17.6.3 The holder of environmental authorisation must prevent the occurrence of nuisance conditions or health hazards.	1	No occurrence of nuisance conditions or health hazards have been recorded during this auditing period.	
17.6.4 The holder of environmental authorisation must ensure that all personnel who work with hazardous waste are trained to deal with these potential hazardous situations so as to minimise the risks involved. Records of training and verification of competence must be kept by the Authorisation Holder.	1	The induction material covers working with hazardous material. No additional proof of training on the use of	

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
		hazardous materials had been provided.	
17.6.5 No effluent must be discharged into any storm water drain or furrow, whether by commission or by omission.	1	No effluent is discharged into stormwater drains or furrows.	
17.7 Water quality monitoring 17.7.1 The holder of the environmental authorisation must carry out all tests required in terms of this environmental authorisation in accordance with published laboratory analysis methods or those prescribed by and obtainable from the South African Bureau of Standards (SABS), referred to in the Standards Act, 2008 (Act 08 of 2008).	1	All laboratory analysis methods used for monitoring is done in accordance with South African Bureau of Standards (SABS), referred to in the Standards Act, 2008 (Act 08 of 2008). The last water quality monitoring reports available are from February 2025.	
17.7.2 Seven pairs of monitoring boreholes must be drilled around the proposed continuous ash disposal facility. The holder of authorisation must conduct monthly monitoring of groundwater levels, groundwater quality as indicated in condition 17.6.4 purged groundwater sampling and the analytical suite for groundwater	0	Monitoring boreholes have been drilled as required; however, monthly groundwater quality monitoring has not	Groundwater monitoring is to be conducted monthly as per the EA.

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
samples including determinants as per existing Water Use License (License no: 04/B20E/BCEGI/1048).	0	been conducted since February 2025.	This is to be addressed by 30 September 2025.
17.7.3 Numerical groundwater modelling and geophysical studies should be carried out to map out the geological structures, and to assist with locating the proposed new monitoring boreholes. This information must be submitted to the competent authority within 6 months from the date of issue of this environmental authorisation.	1	Numerical groundwater modelling and geophysical studies were carried out as per condition 17.6.3.	
17.7.4 Monitoring boreholes must be equipped with lockable caps. The competent authority reserves the right to take water samples at any time and to analyse these samples or have them analysed.	1	Boreholes are equipped with lockable	
17.7.5 Detection Monitoring 17.7.5.1 Groundwater and surface water quality monitoring must be conducted -	0	Several exceedances were recorded in the latest (January 2025 and February 2025) water quality monitoring reports. The latest water quality monitoring reports provided were those of January 2025 and February 2025. No water quality monitoring reports	Investigations must be carried out to identify the causes of the exceedances and this must be addressed efficiently as per recommendations made in the water quality monitoring reports complied by water quality specialists.

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
		<p>have been produced since then.</p> <p><u>Surface Water Monitoring:</u></p> <p>An assessment of the recordings was conducted upstream and downstream to determine the contribution the facility has to the readings recorded. Exceedance was noted where the readings increased from those recorded upstream.</p> <p>The following exceedances were noted downstream of the sites</p> <ul style="list-style-type: none"> <li>• LEE02 – SO<sub>4</sub>, Na</li> </ul>	<p>The IEA Holder indicated that the surrounding land use activities contribute to the readings reported. It is recommended that the IEA Holder consult with DWS in this regard and apply for an amendment to consider these factors if they were erroneously omitted in consideration of the limits stipulated.</p> <p>This is a recurring finding. Action to address the finding is to be initiated by 30 November 2025.</p>

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
		<ul style="list-style-type: none"> <li>CSW03 – Mn, E. coli</li> </ul> <p><u>Groundwater Monitoring:</u></p> <p>The are no groundwater monitoring points upstream of the ADF. Exceedances were recorded for the following parameters:</p> <ul style="list-style-type: none"> <li>ADFBH1 – S: SO4</li> <li>ADFBH2 – D: F</li> <li>ADFBH2 – S: F, Mn</li> <li>ADFBH3 – D: Mn</li> <li>ADFBH3 – S: SO<sub>4</sub>, Mn, B</li> </ul>	
a. for variables listed in Annexure III - bi-annually			

CONDITIONS	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
b. for variables listed in Annexure III – annually or such frequency as may be determined by the competent authority.			
17.7.6 The leachate detection system must be monitored on a daily basis for possible leakages.	N/A	This condition is applicable during the operational phase.	
17.7.6.1 Should a leak or failure be suspected or detected during monitoring or at any time, it must be regarded as an incident according to condition 17.4.3 below and be addressed to the satisfaction of the competent authority.	N/A	This condition is applicable during the operational phase.	
17.7.6.2 Inspections of liners, where liners are accessible must be performed monthly. Liners must be repaired or replaced when inspection tests show deterioration/leakage and these corrective actions shall be performed to the satisfaction of the competent authority.	N/A	This condition is applicable during the operational phase.	
17.7.7 Investigative 17.7.8 If in the opinion of the competent authority, a water quality variable listed under the detection monitoring programme, as referred to in condition 17.6.4 shows an increasing trend, the holder of authorisation shall initiate a monthly monitoring programme.	-	This condition is noted. The competent authority has not expressed a requirement for monthly water quality monitoring.	

## APPENDIX 2.2: CHECKLIST FOR ENVIRONMENTAL MANAGEMENT PROGRAMME

MANAGEMENT MEASURES	COMPLIANCE STATUS		COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT			
3.3. Training-				
<ul style="list-style-type: none"> <li>The Environmental Personnel shall be appropriately trained in environmental management and shall possess the skills necessary to impart environmental management skills to all personnel involved in the construction, rehabilitation and operation of the corridor;</li> </ul>	1		<p>It is requirement that all contractors and environmental personnel familiarise themselves with the contents of the EMPr and IEA prior to signing a contract.</p> <p>All personnel are required to undergo induction in order to ensure they are appropriately trained and familiar with the management measures of contained in the EMPr.</p>	
<ul style="list-style-type: none"> <li>The Project Manager and Environmental Personnel/Manager shall ensure, on behalf of Eskom, that the employees (including construction workers, engineers, and long-</li> </ul>	1		<p>All personnel are required to undergo induction in order to ensure they are appropriately trained and familiar with the</p>	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
term employees) are adequately trained on the stipulations of the EMPr; and		management measures of contained in the EMPr.	
<ul style="list-style-type: none"> <li>All employees shall have an induction presentation on environmental awareness. The cost, venue and logistics shall be for Eskom's account.</li> </ul>	1	All personnel are required to undergo induction in order to ensure they are appropriately trained and familiar with the management measures of contained in the EMPr.	
<ul style="list-style-type: none"> <li>Where possible, training must be conducted in the language of the employees. The induction and training shall, as a minimum, include the following:</li> </ul>	1	Training is conducted in English, isiZulu and translated to other languages when necessary to accommodate all employees.	
<ul style="list-style-type: none"> <li>The importance of conformance with all the specifications of the EMPr and other environmental policies and procedures;</li> </ul>	1	This component is included in the induction material and EMPr distributed to all contractors.	
<ul style="list-style-type: none"> <li>The significant environmental impacts, actual or potential, of their work activities;</li> </ul>	1	This component is included in the induction material and	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
		EMPr distributed to all contractors.	
<ul style="list-style-type: none"> <li>The environmental benefits of improved personal performance;</li> </ul>	1	This component is included in the induction material and EMPr distributed to all contractors.	
<ul style="list-style-type: none"> <li>Their roles and responsibilities in achieving conformance with the EMPr and other environmental policies and procedures;</li> </ul>	1	This component is included in the induction material and EMPr distributed to all contractors.	
<ul style="list-style-type: none"> <li>The potential consequences of departure from specified operating procedures; and</li> </ul>	1	This component is included in the induction material and EMPr distributed to all contractors.	
<ul style="list-style-type: none"> <li>The mitigation measures required to be implemented when carrying out their work activities.</li> </ul>	1	This component is included in the induction material and EMPr distributed to all contractors.	
3.4. Commissioning of Tenders for the Project			

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>• All tendering Contractors will be made aware of the contents of this EMPr and any penalties arising from non-compliance, and</li> </ul>	1	<p>It is a requirement that all contractors and environmental personnel familiarise themselves with the contents of the EMPr and IEA prior to signing a contract.</p>	
<ul style="list-style-type: none"> <li>• All appointed Contractors / Sub-contractors will be required to attend the EMPr training and induction as detailed in the section above.</li> </ul>	1	<p>It is a requirement that all contractors and environmental personnel familiarise themselves with the contents of the EMPr and IEA prior to signing a contract.</p> <p>All personnel are required to undergo induction in order to ensure they are appropriately trained and familiar with the management measures of contained in the EMPr.</p>	
3.5. Environmental Authorisation			

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
The Contractor will be required to provide the ECO with written proof (e.g. Competed Attendance Register) that induction on the contents of this EMPr and the conditions of the Environmental Authorisation have been provided to all employees of the contractor and sub-contractors. This formal induction training is a requirement of ISO 14001 and shall be done with all main and sub-contractors Record of the training dates, people who attended and discussion points shall be kept by the ECO	1	Contractors provide ECOs with proof of induction.	
3.6. Environmental Management Measures			
The management measures documented in each of the sub-sections below have been compiled using the following information:			
<ul style="list-style-type: none"> <li>Impact Assessment and mitigation measures documented in the Final EIR for the KPS Continuous ADF Project:</li> </ul>	-	Noted	
<ul style="list-style-type: none"> <li>Best Environmental Management Practice: and</li> </ul>	-	Noted	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>The findings and recommendations of the various specialist studies that have been undertaken for the proposed PS Continuous ADF Project.</li> </ul> <p>In addition to the abovementioned information sources, the granted Environmental Authorisation must be complied with</p>	-	Noted	
4 MONITORING			
4.1. Wetland Monitoring			
<ul style="list-style-type: none"> <li>Implement a water quality and bio-monitoring plan for all wetland systems draining away from the proposed developments;</li> </ul>	1	The IEA Holder has a water quality and bio-monitoring plan for all wetland systems draining away from the proposed developments.	
<ul style="list-style-type: none"> <li>Monitor dust deposition within the surrounding environment;</li> </ul>	0	<p>There was no dust monitoring reports available during this audit. The last dust monitoring report made available is dated April 2025.</p>	<p>Dust monitoring is not conducted monthly.</p> <p>This finding is to be addressed by the 30<sup>th</sup> of September 2025.</p>

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>Monitor vegetation establishment to ensure successful establishment;</li> </ul>	1	ECOs conduct regular inspections in areas where progressive rehabilitation has been undertaken. Recommendations are made where required.	
<ul style="list-style-type: none"> <li>A vegetation and erosion monitoring plan should be established for all rehabilitated sites with clearly defined measures to respond to erosion damage or unsuccessful re-vegetation.</li> </ul>	1	All contractors have method statements regarding vegetation and erosion monitoring that have been approved by the ECO.	
4.2. Air quality			
<ul style="list-style-type: none"> <li>Fugitive dust emissions from the ash disposal facility should be minimised through either re-vegetation, or a combination of re-vegetation and watering</li> </ul>	N/A	The project is in the construction phase and therefore, the ash disposal facility is not yet operational.	
<ul style="list-style-type: none"> <li>Due to the location of the ash disposal facility in the Highveld Priority Area (Section 3.2.1) and the already elevated concentrations of airborne particulates, it is</li> </ul>	0	There was no dust monitoring reports available during this audit. The last dust monitoring	Dust monitoring is not conducted as per EMPr.

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
recommended that PM concentrations be monitored near the ash disposal facility. The nearest possible, secure, location to the following point: 26° 0527.39"S; 28°5453.68"E. Because of the active nature of the ash disposal facility it is feasible to use a mobile unit for this additional Pi monitor.		report made available is dated April 2025.	This finding is to be addressed by the 30th of September 2025.
<ul style="list-style-type: none"> <li>Dust fallout monitoring should be conducted, in the direction of the prevailing winds and co- located, where possible, at sensitive receptors within the zone of highest Impact.</li> </ul>	0	There was no dust monitoring reports available during this audit. The last dust monitoring report made available is dated April 2025.	Dust monitoring is not conducted as per EMPr.  This finding is to be addressed by the 30th of September 2025.
4.3. Land Capability			
<ul style="list-style-type: none"> <li>On-going sampling and monitoring of the in-situ conditions will be necessary throughout the Operational Phase to accurately define the post operational conditions if the rehabilitation is to be successful.</li> </ul>	N/A	The project is in the construction phase. This condition will be applicable in the operational phase.	
4.4. Terrestrial Ecology			

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>It is recommended that regular monitoring of rehabilitated areas, by a qualified ECO, be undertaken to ensure successful stabilisation and re-vegetation of disturbed areas.</li> </ul>	1	<p>ECOs conduct regular inspections in areas where rehabilitation has been undertaken.</p> <p>Recommendations are made where required.</p>	
<ul style="list-style-type: none"> <li>An exotic species control programme including monitoring, must be developed and implemented to reduce the encroachment of exotic invasive species.</li> </ul>	1	<p>Method statements dealing with exotic species control programmes are developed by each of the contractors for their respective sites. These method statements are approved by the ECOs.</p> <p>Implementation is currently on the way. During the audit, the removal completion was at around 70%. Figure 6</p>	
<ul style="list-style-type: none"> <li>Regular monitoring of erosion sites and sites of potential erosion for a two-year period following closure.</li> </ul>	N/A	<p>This condition will be applicable post-closure. The</p>	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
		project is currently in the construction phase.	
<ul style="list-style-type: none"> <li>Continue to conduct exotic invasive species control, including monitoring, for a two-year period following closure.</li> </ul>	N/A	This condition will be applicable post-closure. The project is currently in the construction phase.	
5. General management measures			
Prior to the commencement of the construction phase:			
<ul style="list-style-type: none"> <li>Activity/ies may not commence within the specified number of days of the date of signature of the authorisation</li> </ul>	1	Activities commenced in July 2020. Authorisation was granted in July 2015.	
<ul style="list-style-type: none"> <li>Should Eskom be notified by the minister of a suspension of the authorisation pending appeal procedures, Eskom may not commence with the activity / activities unless authorised by the minister in writing;</li> </ul>	-	This condition is noted. No notification of a suspension of work has been issued by the minister.	
<ul style="list-style-type: none"> <li>Written notice must be given to the Department that the activity will commence</li> </ul>	1	Written notice was submitted to the Department on the 23 <sup>rd</sup> of	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
as per the specified number of days. Commencement for the purposes of this condition includes site preparation. The notice must include a date on which it is anticipated that the activity will commence;		June 2020, and work commenced on the 7 <sup>th</sup> of July 2020. Proof of notification was provided.	
<ul style="list-style-type: none"> <li>• All relevant permits and permissions shall be obtained from the relevant authorities to undertake construction activities as necessary;</li> </ul>	1	All required permits relevant to the activities occurring on-site have been obtained.	
<ul style="list-style-type: none"> <li>• Obtain a signed agreement statement from the contractor indicating willingness to comply with the EMPr</li> </ul>	1	The requirement to comply with the conditions of the EMPr form part of the bidding requirements and contracts signed between Eskom and the contractors.	
<ul style="list-style-type: none"> <li>• An environmental awareness training session for all of the Contractor's staff is required;</li> </ul>	1	Inductions are held prior to contractors commencing with work. In addition, toolbox talks are held regularly by contractors.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>The course content for the environmental awareness training course shall be provided to the Contractor; and</li> </ul>	1	Environmental awareness training manual is presented to the Contractor (employees).	
<ul style="list-style-type: none"> <li>The training session shall be delivered in English and at least one of the local the languages of the site staff where practical.</li> </ul>	1	Training and induction are conducted in English and translated when required.	
5.1. Fire protection			
<ul style="list-style-type: none"> <li>The Contractor shall have fire-fighting equipment available on all vehicles working on site, especially during the dry winter months.</li> </ul>	1	Fire extinguishers are placed at the campsite and strategic positions around work areas.	
<ul style="list-style-type: none"> <li>Preferentially no fires will be lit on the site, if however required, fires must be limited to use for cooking and heating use only within a designated area. This area will be a suitable distance from fuel sources. A fire will be constantly monitored while present.</li> </ul>	1	<p>No fires are ignited outside of designated areas.</p> <p>Only braai fires are allowed occasionally on-site, and these are made in a controlled space away from fuel storage areas.</p>	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>In terms of the Atmospheric Pollution Prevention (APPA), burning is not permitted for waste disposal.</li> </ul>	1	Burning of waste is not permitted on-site.	
<ul style="list-style-type: none"> <li>Suitable precautions will be taken (e.g., suitable fire extinguisher, welding curtains) when working with welding or grinding equipment near potential sources of combustion.</li> </ul>	N/A	No welding is occurring on-site during this auditing period.	
<ul style="list-style-type: none"> <li>All fire control mechanisms (firefighting equipment) will be routinely inspected by a qualified investigator for efficacy and be approved by local fire services. Such mechanisms will be present and accessible at all times.</li> </ul>	1	Fire extinguishers are placed at the camp site and strategic positions around work areas.	
<ul style="list-style-type: none"> <li>All staff on site will be made aware of general fire prevention and control methods, and the name of the responsible person to alert to the presence of a fire.</li> </ul>	1	Fire management is addressed in the inductions.	
<ul style="list-style-type: none"> <li>The Contractor will advise the relevant authority of a fire outside of a demarcated area as soon as it starts and will not wait until he can no longer control it.</li> </ul>	-	This condition is noted. No fires have occurred outside of demarcated areas during this auditing period.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
5.2. Method Statement			
<ul style="list-style-type: none"> <li>Method Statements for the construction activities shall be submitted by the Contractor at least 7 working days prior to the commencement of work for approval;</li> <li>All Method Statements must be approved by the Project Manager, Environmental Manager and ECO (as and when required).</li> <li>No works shall commence on any activity until such time as the Method Statement has been approved in writing.</li> <li>Activities/works shall be carried out in accordance with the approved Method Statement.</li> </ul>	1	<p>All contractors are required to submit method statements related to their respective sites and works to the ECOs, SHE Managers, PM, and other related departments for approval prior to the commencement of their work.</p>	
5.3. Environmental Forum			
Forum to be implemented during the operational phase	N/A	The project is currently in the construction phase.	
Environmental Forum shall be established. The established environmental forum will:	N/A	The project is currently in the construction phase.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>• Ensure that relevant policies have been drawn up;</li> </ul>	N/A	The project is currently in the construction phase.	
<ul style="list-style-type: none"> <li>• Attend to community Grievances; and</li> </ul>	N/A	The project is currently in the construction phase.	
<ul style="list-style-type: none"> <li>• Discuss pertinent issues relative to the project</li> </ul>	N/A	The project is currently in the construction phase.	
5.4. General Housekeeping			
The following general housekeeping measures should be implemented throughout the construction phase and should be monitored by the contractor and Environmental Manager			
<ul style="list-style-type: none"> <li>• The feeding of, or leaving of food for animals, is strictly prohibited;</li> </ul>	1	Feeding of, or leaving of food for animals is prohibited. This is communicated during inductions and toolbox talks.	
<ul style="list-style-type: none"> <li>• No fires for the purpose of cooking or warming purposes will be permitted other than within designated areas, for instance, at the site camp;</li> </ul>	1	No fires are designated outside of designated areas.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>The cooking area will be positioned such that no vegetation is in close proximity thereto, including overhanging trees. An area around the cooking area will be cleared such that any escaping embers will not start an uncontrolled fire;</li> </ul>	1	Braai areas are provided at the campsite for occasional use. They are positioned in a safe area with no fire risk.	
<ul style="list-style-type: none"> <li>Sufficient bins shall be present in this area for all waste material; and</li> </ul>	1	Sufficient bins are present at the site camp. Waste is separated at the source.	
<ul style="list-style-type: none"> <li>Dish washing facilities shall be provided. These may be very basic, but a process must be put in place to ensure that wastewater is disposed of appropriately.</li> </ul>	1	Adequate dishwashing facilities are available at all site camps.	
5.5. Landowner Interaction			
<ul style="list-style-type: none"> <li>No verbal agreements shall be made with land owners. All agreements shall be recorded properly and all parties shall co-sign the documents. Only the ECO and Eskom to liaise with landowners. It is proposed that a photographic record of access toads be kept. Matters relating to any</li> </ul>	N/A	<p>Eskom is the owner of the land on which the activities are taking place.</p> <p>Only Eskom and the ECO liaise with adjacent landowners when required.</p>	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
interaction with landowners shall be undertaken by the project manager, contractor and Environmental Manager			
5.6. Damage to Property			
The following management measures relating to the damage of Eskom property relates to all phases of the Project Lifecycle			
<ul style="list-style-type: none"> <li>• All damage to Eskom property shall be recorded and reinstated immediately.</li> </ul>	N/A	There was no damage to property reported. Eskom owns the land upon which the activities are occurring. There is a provision in the contracts for the repair of damaged Eskom property by Contractors.	
<ul style="list-style-type: none"> <li>• The Environmental Control Officer should also keep a photographic record of such damage</li> </ul>	N/A	There was no damage to property reported. Eskom owns the land upon which the activities are occurring.	
<ul style="list-style-type: none"> <li>• The date, time of damage, type of damage and reason for the damage shall be</li> </ul>	N/A	There was no damage to property reported. Eskom	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
recorded in full to ensure the responsible party is held liable.		owns the land upon which the activities are occurring.	
<ul style="list-style-type: none"> <li>• All claims for damages should be directed to the Environmental Control Officer for appraisal.</li> </ul>	N/A	No claims were reported during this auditing period.	
<ul style="list-style-type: none"> <li>• The Contractor shall be held liable for all unnecessary damage to Eskom property.</li> </ul>	1	This condition is noted. Contractually any damages are assessed and compensation evoked is necessary. Contractors and sub-contractors are aware of their responsibilities.	
<ul style="list-style-type: none"> <li>• Ensure that claims are settled within one (1) month;</li> </ul>	N/A	No claims were reported during this auditing period.	
<ul style="list-style-type: none"> <li>• Successful completion of the contract and all Landowners signing release forms within 6 months of completion of the project.</li> </ul>	N/A	Eskom owns the land upon which the activities are occurring.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>• All claims shall be handled immediately to ensure timeous rectification / payment; and</li> </ul>	N/A	There have not been any claims during this auditing period.	
<ul style="list-style-type: none"> <li>• All matters relating to any damage to Eskom Property shall be undertaken by the Contractor, SHEQO, ECO and Environmental Manager.</li> </ul>	-	This condition is noted.	
5.7. Social Environment			
All management measures relating to the social environment will be undertaken by the contractor, Environmental Manager and Project Manager. Furthermore, the management measures which are provided below are intended to reduce nuisance impacts as a result of Construction activities and to deal with community grievances			
<ul style="list-style-type: none"> <li>• Develop detailed traffic control plans to minimise road and traffic disruptions</li> </ul>	1	Traffic control measures such as stop signs and speed humps are in place to minimise road and traffic disruptions.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>Compile an access protocol that employees and contractors must follow before they access property that does not belong to Eskom; and</li> </ul>	N/A	Eskom owns the land upon which the activities are occurring.	
<ul style="list-style-type: none"> <li>Provide advanced communication (i.e. signage about changes to local access, potential road hazards and expected traffic volumes during construction</li> </ul>	1	Signs are placed strategically throughout the site.	
6. ENVIRONMENTAL SPECIFICATIONS			
6.1. Environmental Incident			
<ul style="list-style-type: none"> <li>A communication structure and incident reporting structure (with contact details, should be made available to all parties concerned).</li> </ul>	1	An incident register with all relevant details is also maintained. A communication structure is also in place; it stipulates different levels of reporting according to the severity of the incident.	
<ul style="list-style-type: none"> <li>All environmental incidents should be recorded and reported as per the current Eskom procedures to the ECO/Eskom.</li> </ul>	1	Incidents are recorded in monthly auditing reports compiled by the ECOs. An	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
		incidents' register with all relevant details is also maintained.	
<ul style="list-style-type: none"> <li>Incidents as per NEMA section 30 should be reported to the relevant Department.</li> </ul>	N/A	No incidents as described in NEMA section 30 have been reported during this auditing period.	
6.2. Preconstruction Phase			
6.2.1. Vegetation clearing			
<ul style="list-style-type: none"> <li>Minimum amount of vegetation clearance must take place in accordance with the Site Layout Plan.</li> </ul>	1	Vegetation clearance is undertaken as per the approved site layout plan.	
<ul style="list-style-type: none"> <li>As feasible, vegetation clearing should be conducted in a phased approach in line with the continuation of the ADF.</li> </ul>	1	Vegetation clearing has occurred in a phased approach. Clearing only occurs in pre-approved locations.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>Vegetation clearing should be restricted to the proposed development footprints only, with no unnecessary clearing permitted outside of these sites.</li> </ul>	1	Vegetation clearing is occurring within the approved footprint of the project.	
<ul style="list-style-type: none"> <li>Sites to be cleared should be marked / taped-off to prevent unnecessary clearing outside of these demarcated sites</li> </ul>	1	Sites are clearly tapered off or pegged to restrict clearing activities beyond the approved footprint.	
<ul style="list-style-type: none"> <li>Removed topsoil should be stockpiled and used to rehabilitate disturbed areas. Topsoil should ideally not be stockpiled for greater than 12 months; however, should the topsoil stockpile be stored greater than 12 months it should be aerated and stockpiles should not exceed two metres in height.</li> </ul>	1	<p>Topsoil that is stockpiled is used for rehabilitation purposes. Rehabilitation occurs in phases where possible.</p> <p>Contractors aerate their stockpiles and photographic evidence is submitted to the ECOs.</p>	
<ul style="list-style-type: none"> <li>Vegetation clearing activities should be undertaken under the supervision of an ECO;</li> </ul>	1	Vegetation clearing is undertaken under the supervision of the ECOs.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
• Areas should be cleared of vegetation only immediately prior to construction; and	1	Vegetation is cleared immediately prior to construction.	
• Prior to construction, all areas designated for vegetation clearing should be clearly marked and surveyed for Red Data/protected flora and fauna species.	1	The project site was surveyed for Red Data/protected fauna and flora.	
• A photographic record of the area earmarked for the site camp must be produced prior to site establishment. This will serve as a benchmark against which rehabilitation will be measured and shall be kept in the site environmental file.	1	Photographic records of the flora and fauna referred to in 6.2.1 are maintained.	
• A suitable rehabilitation programme should be developed and implemented in all disturbed areas post-construction.	N/A	The project is still in the construction phase. This condition applies in the rehabilitation phase.	
• It is recommended that monitoring of rehabilitated areas be undertaken to ensure successful stabilisation and re-vegetation of disturbed areas	N/A	The project is still in the construction phase. This	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
		condition applies in the rehabilitation phase.	
<ul style="list-style-type: none"> <li>• All plants containing any diseases and/or pests will be removed from the site.</li> </ul>	-	This condition is noted.	
6.2.2. Site Establishment			
<ul style="list-style-type: none"> <li>• The Site Camp should not be positioned within or in close proximity to any sensitive environmental features;</li> </ul>	1	All site camps are appropriately positioned and are not located in proximity to sensitive environmental features.	
<ul style="list-style-type: none"> <li>• The Site Camp and Laydown Areas should be positioned to provide the least visual impact on the receiving environment;</li> </ul>	1	The site camp and laydown areas are positioned to provide the least visual impact on the receiving environment.	
<ul style="list-style-type: none"> <li>• The Site Camp and Laydown Areas should be fenced of the prevent uncontrolled access to these areas;</li> </ul>	1	Strict access control and fencing are implemented at all construction camps.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>No deviations from the approved Site Layout Plan will be permitted;</li> </ul>	1	There have not been any deviations from the approved site layout plan to date.	
<ul style="list-style-type: none"> <li>All existing infrastructure within and adjacent to the proposed development area must be shown on a layout plan. The condition of existing infrastructure prior to construction should be documented;</li> </ul>	1	The approved site layout plan indicates existing infrastructure within and around the development.	
<ul style="list-style-type: none"> <li>A Site Layout Plan illustrating the location and layout of the proposed site camp and working areas must be produced by the appointed Contractor, and be approved by the Project Manager. The Site Layout Plan should as a minimum show the location of the following:           <ul style="list-style-type: none"> <li>-Buildings and structures;</li> <li>-Contractors' camp and lay down areas;</li> <li>-Site offices;</li> </ul> </li> </ul>	1	The approved site layout plan indicates all the listed features.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>-Materials and equipment storage areas;</li> <li>-Roads and access routes;</li> <li>-Solid waste and hazardous waste storage areas,</li> <li>-Ablution facilities;</li> <li>-Topsoil stockpiles;</li> <li>-Known / likely locations of heritage and archaeological resources;</li> <li>-Access Roads;</li> <li>-Spoil areas;</li> <li>-Construction materials stores;</li> <li>-Vehicle and equipment stores;</li> <li>-Workshops;</li> <li>-Wash bays; and</li> <li>-Sensitive environmental features.</li> </ul>			

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
6.3. Construction phase			
6.3.1. Management of Archaeology and Heritage Resources			
<ul style="list-style-type: none"> <li>In the case where a grave is identified during construction, the following measures must be taken:           <ul style="list-style-type: none"> <li>-Upon the accidental discovery of graves, a buffer of at least 20 meters should be implemented.</li> <li>-If graves are accidentally discovered during construction, activities must cease in the area and a qualified archaeologist be contacted to evaluate the find. To remove the remains a permit must be applied for from SAHRA and other relevant authorities. The local South African Police Services must immediately be notified of the find</li> <li>-Where it is recommended that the graves be relocated, a full grave relocation process that includes comprehensive social consultation must be followed.</li> </ul> </li> </ul>	1	No graves or archaeological features have been discovered to date.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>Should any heritage or archaeological resources be exposed during excavation or be found on site, the relevant heritage resource agency (i.e. Mpumalanga Heritage Resources Authority) must be informed about the finding</li> </ul>	N/A	No discoveries within the project site have been made during this auditing period.	
<ul style="list-style-type: none"> <li>Under no circumstances may any heritage material be destroyed or removed from site.</li> </ul>	-	This condition is noted.	
<ul style="list-style-type: none"> <li>In the event of the identification of any structures that present the possibility of being a grave, it is recommended that a test excavation be done to determine the presence of a grave. If the structure is determined to be a grave, a full grave relocation process with a detailed social consultation process needs to be initiated to enable the possible relocation of the remains.</li> </ul>	N/A	No discoveries within the project site have been made.	
<ul style="list-style-type: none"> <li>All known sites of cultural, archaeological, and historical significance must be demarcated and indicated on the site layout plan, and marked as no-go areas.</li> </ul>	-	This condition is noted.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>Should remains and/or artefacts be discovered on the site during earthworks, all work will cease in the area affected and the Contractor will immediately inform the PM.</li> </ul>	-	This condition is noted.	
<ul style="list-style-type: none"> <li>Should any remains be found on site that is potentially human remains, the South African Police Service should also be contacted. Construction activities must cease and a buffer of at least 20 meters is required.</li> </ul>	-	This condition is noted.	
6.3.2. Management of watercourses			
(a) Wetland Habitat			
<ul style="list-style-type: none"> <li>Avoid additional wetland loss by limiting construction activities to as small an area as possible, ideally within the footprint of the proposed Continuous ADF;</li> </ul>	1	Construction activities are located as far away as possible from the wetland.	
<ul style="list-style-type: none"> <li>Demarcate all wetland areas that fall outside the direct footprint of activities to limit impacts on wetlands;</li> </ul>	1	Access to wetland area is restricted and demarcated as far as possible.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
		A wetland management report was compiled by Wetland Consulting Services (Pty) Ltd.	
<ul style="list-style-type: none"> <li>No stockpiling of material may take place within the wetland areas and temporary construction camps and infrastructure should also be located at least 100 meters away from wetland areas falling outside the development footprint;</li> </ul>	1	<p>No materials are stockpiled within wetland areas.</p> <p>Temporary construction camps and infrastructure are located over 100m from the wetlands.</p>	
<ul style="list-style-type: none"> <li>Regular cleaning up of the wetland areas should be undertaken to remove litter.</li> </ul>	1	<p>There is no littering in the wetland areas or anywhere else on-site.</p>	
<ul style="list-style-type: none"> <li>Develop a compensatory strategy to compensate for the loss of wetland habitat and functioning through the rehabilitation and enhancement of remaining wetland habitat on site as well as downstream reaches. Rehabilitation activities should gains of at least the same number of target hectare equivalents as are likely to be lost.</li> </ul>	1	<p>A Wetland Management and Rehabilitation Report was compiled by Wetland Consulting Services (Pty) Ltd.</p>	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
(b) Stormwater management			
• Install the construction storm water management system prior to the onset of vegetation clearing activities on the ash dam footprint.	1	Stormwater management features were installed prior to vegetation clearing and are amended as and when required.	
• Where practically possible, the major earthworks within the extent of any watercourse should be undertaken during the dry season (roughly from April to August) to limit erosion due to rainfall runoff;	N/A	No earthworks occurred within a watercourse during this auditing period.	
• Install sediment barriers and/or low berms along the downslope edge of cleared areas to trap sediments on site. Design of sediment barriers should be such that expected flow velocities will not damage the barriers or impair their function. Regular cleaning and maintenance of the barriers should be undertaken;	1	Silt fences and sediment barriers are installed in strategic areas. Regular maintenance is undertaken by the respective contractors.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
• Install sediment traps as part of the storm water management plan where necessary upstream of discharge points;	1	Stormwater management features are installed where necessary upstream of the discharge points. Figure 12	
• Divert clean water around the cleared area and install erosion protection measures and energy dissipaters at points of discharge;	1	Clean water and dirty water are separated in channels. Retaining walls and berms are installed to limit erosion.	
• It is essential that the ADF, together with storm water drains and pollution control dams, be appropriately lined (according to the relevant waste classification), so that no contaminants reach the groundwater.	1	The ADF is lined with a class C liner as per waste classification.	
• Cleared areas outside direct development footprint should be re-vegetated via hydro-seeding as soon as possible; and	1	Hydroseeding was conducted along the stream diversion and areas that were previously disturbed. The area has been satisfactorily revegetated.	
• A vegetation and erosion monitoring plan should be established for all rehabilitated	1	ECOs monitor rehabilitation and compliance with	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
sites with clearly defined measures to respond to erosion damage or unsuccessful re-vegetation.		management actions included in rehabilitation plans.	
(c) Management of Hazardous Substances			
<ul style="list-style-type: none"> <li>Store and handle potentially polluting substances and waste in designated, bunded facilities. Waste should be regularly removed from the construction site by suitably equipped and qualified operators and disposed of in approved facilities;</li> </ul>	1	<p>Hazardous substances are stored within bunded facilities and removed from the site regularly.</p> <p>A skip was observed placed on bare ground at one of the campsites. A recommendation to place it in a bunded area was made, the correction was effected within 24 hours.</p> <p>Figure 5</p>	Finding closed.
<ul style="list-style-type: none"> <li>Temporary waste and hazardous substance storage facilities and ablution facilities should not be placed within 100 meters from any wetland boundary;</li> </ul>	1	Temporary waste and hazardous substance storage facilities, as well as ablution facilities, are not located within 100m of a wetland.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
• Keep sufficient quantities of spill clean-up materials on site;	1	Sufficient spill kits were observed on-site.	
• Keep a detailed log on site of all spills;	1	ECOs keep a log of all incidents, including minor spillages occurring on the sites.	
• No washing of machinery or equipment within wetlands areas adjacent to the development sites should be allowed; and	1	No machinery or equipment is washed within wetland areas.	
• Prior to the onset of construction activities within the Farm Dam area, the sediments within the basin of the dam should be sampled and analysed to determine any potential contamination of these sediments and the likelihood of the contaminants mobilizing during construction. A thorough risk assessment should be undertaken and the proposed activities amended accordingly. If required, the contaminated sediments might have to be removed off site	N/A	No construction is occurring within the farm dam area.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
and disposed of on an authorized waste disposal site.			
(d) Flow regime			
<ul style="list-style-type: none"> <li>The position and design of stream crossings should follow existing roads as far as possible;</li> </ul>	N/A	<p>There is no stream crossing. Rather a stream was successfully diverted in order to minimise impacts of works on the stream.</p>	
<ul style="list-style-type: none"> <li>Disturbance of riparian areas along the wetland areas should be minimised. Adjacent riparian areas should be cordoned off and considered no-go areas;</li> </ul>	1	<p>Stream diversion was successfully achieved and rehabilitation has occurred. Hydroseeding was conducted and vegetation has been restored successfully.</p> <p>Wetland areas are cordoned off as no-go areas.</p>	
<ul style="list-style-type: none"> <li>Crossings should ideally be perpendicular to streams to minimise the footprint;</li> </ul>	N/A	<p>There is no stream crossing. Rather, a stream was successfully diverted in order</p>	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
		to minimise the impacts of works on the stream.	
<ul style="list-style-type: none"> <li>Transfers should be located outside of wetland areas;</li> </ul>	1	There are no transformers in the wetland area.	
<ul style="list-style-type: none"> <li>Dirty storm water dams should be designed to prevent spills or leaks of contaminated water and no dirty water should be discharged directly into wetland areas;</li> </ul>	1	Dirty stormwater dams are designed to prevent spills or leaks of contaminated water. An additional catch zone has been constructed in the event of a failure to contain a high volume. In addition, the dams are designed with a freeboard of 800m and in consideration of the predicted maximum precipitation event.	
<ul style="list-style-type: none"> <li>Ensure easy access for maintenance or clean ups;</li> </ul>	1	Easy access to dirty water dams is for clean-up is available.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
• The time period during which flow is modified due to construction should be kept as short as possible;	N/A	The stream diversion process has been completed, and rehabilitation is complete.	
• Diversion to be built according to the engineering report,	1	Diversion was built as per approved engineering reports and designs.	
• The main river diversion channel will be split into a number of small canals which will facilitate the diffuse release of water to the downstream wetland;	1	Diversion was built as per approved engineering reports and designs.	
• In-stream baffles will be incorporated in each canal channel to vary flow direction and slow its rate;	1	Diversion was built as per engineering reports and designs.	
• The channels will discharge to the wetland via a permeable engineered structure, such as reno mattresses;	1	Diversion was built as per engineering reports and designs.	
• The river diversion design should also include for the collection of runoff from the hill slope to the north of the river diversion, as lateral (sub-surface) flow will move down	1	Diversion was built as per engineering reports and designs.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
the slope. In order to allow for the collection of this runoff, a permeable layer such as a reno mattress on the upslope-facing side of the diversion channel would need to be incorporated into the design. This will allow runoff from the hill slope to enter the diversion channel through the permeable layer; thereafter being transported downstream in the diversion channel; and			
<ul style="list-style-type: none"> <li>Appropriate storm water management at the toe of the ash dump should be maintained, in order to prevent sediment/ash-laden runoff entering the river diversion channel in rainfall events.</li> </ul>	1	Appropriate stormwater management is maintained at the toe of the ash dump.	
( e ) General			
<ul style="list-style-type: none"> <li>Should water be required from sources other than Eskom supply, a written agreement shall be reached between the Contractor and the stakeholder involved;</li> </ul>	1	Approval and written confirmation are obtained for water sourced from suppliers outside of Eskom.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
		ECOs are notified prior to obtaining water from sources other than Eskom.	
<ul style="list-style-type: none"> <li>Should the Contractor be required to use water from a natural source, the Contractor shall supply a method statement to that effect and obtain the required permits. No construction shall take place in the wetland, streams and other river courses without the necessary water license from the Department of Water and Sanitation;</li> </ul>	1	<p>Contractors submit method statements to the ECOs for approval prior to acquiring water from sources other than Eskom.</p> <p>No abstraction of water from natural sources is occurring.</p> <p>No construction work is occurring within wetland areas.</p> <p>There is an existing WUL for the project.</p>	
<ul style="list-style-type: none"> <li>Strict control shall be maintained and the ECO shall regularly inspect the abstraction point and methods used;</li> </ul>	N/A	No water is currently being abstracted.	
<ul style="list-style-type: none"> <li>Potable water to be supplied and available to all staff members.</li> </ul>	1	Potable water is available.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
6.3.3. Management of Fauna			
<ul style="list-style-type: none"> <li>An ECO should be on-site during vegetation clearing to monitor for, and manage any wildlife-human interactions;</li> </ul>	1	ECOs monitor vegetation clearing. Method statements are submitted to the ECOs for approval prior to the clearing.	
<ul style="list-style-type: none"> <li>Employees and contractors should be made aware of the presence of, and rules regarding fauna through suitable induction training and on-site signage;</li> </ul>	1	Induction material addressed the presence of and rules regarding fauna on-site. There is also signage indicating the presence of fauna on-site.	
<ul style="list-style-type: none"> <li>Should any new sites or nests be found, during the construction process, that was not known or have been noted before, each site shall be assessed for merit and the necessary precautions be taken to ensure the least disturbance;</li> </ul>	1	<p>ECOs are notified of the presence of such sites and recommendations are made to ensure that necessary precautions are taken.</p> <p>A search-and-rescue approach is adopted in such cases.</p>	
<ul style="list-style-type: none"> <li>Prior to construction, all areas designated for vegetation clearing should be clearly</li> </ul>	1	A walk-through survey for Red Data/ protected flora or fauna	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
marked and surveyed for Red Data/protected flora and fauna species. It is advised that an ECO be appointed to oversee this process; and		species was conducted prior to construction.	
<ul style="list-style-type: none"> <li>In the event that Red Data / protected flora are identified within the construction footprint and require relocation, rescue permits must be obtained from the provincial or relevant authority, and a suitable ex-situ, and/or in-situ conservation plan developed. The conservation plan must be approved by the provincial authority and overseen by the ECO.</li> </ul>	1	<p>Eskom's Generation Department ECO is notified should any Red Data/protected flora or fauna species be identified on-site.</p> <p>A permit for removals is in place.</p>	
6.3.4. Waste Management			
<ul style="list-style-type: none"> <li>A method statement is required from the Contractor that includes the layout of the camp, management of ablution facilities and waste management;</li> </ul>	1	Approved method statements and waste management plans are available.	
<ul style="list-style-type: none"> <li>The Contractor camp shall have the necessary ablution facilities with chemical toilets where such facilities are not available at commencement of construction;</li> </ul>	1	All contractor camps are equipped with adequate ablution facilities.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>The Contractor shall provide a wastewater management system that will comply with legal requirements and be acceptable to Eskom;</li> </ul>	1	<p>Wastewater management systems are compliant with Eskom standards and legal requirements.</p> <p>Hazardous waste from chemical toilets is disposed of at licensed facilities.</p>	
<ul style="list-style-type: none"> <li>The Contractor will supply waste collection bins where such is not available and all solid waste collected shall be disposed of at a registered waste disposal facility;</li> </ul>	1	<p>There are adequate waste collection bins on-site. Waste is disposed of at a licensed facility.</p>	
<ul style="list-style-type: none"> <li>Under no circumstances may solid waste be burned on site unless a suitable incinerator is available;</li> </ul>	1	<p>No waste is burned on-site.</p>	
<ul style="list-style-type: none"> <li>The disposal of waste shall be in accordance with all relevant legislation;</li> </ul>	1	<p>Waste is disposed of at a licensed facility.</p>	
<ul style="list-style-type: none"> <li>The Contractor shall dispose of all excess material on site in an appropriate manner and at a designated place;</li> </ul>	1	<p>Excess material from the contractors is sent to Eskom</p>	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
		for safe management and disposal.	
<ul style="list-style-type: none"> <li>• All packaging material shall be removed from site and disposed of and not burned on site.</li> </ul>	1	<p>Packaging is removed from the site. No litter was observed strewn around the site.</p> <p>The burning of waste is not permissible.</p>	
<ul style="list-style-type: none"> <li>• No landfill may be used without the consent from the Landowner;</li> </ul>	1	<p>Waste is disposed of at Phola waste disposal site and Simmer and Jack landfill site Landfill Site, proof of approval to dispose of waste is available.</p>	
<ul style="list-style-type: none"> <li>• No hazardous material, e.g. oil or diesel fuel shall be disposed of in an unregistered waste site;</li> </ul>	1	<p>Hazardous waste is disposed of at a licensed facility. Disposal slips are kept on-site.</p>	
<ul style="list-style-type: none"> <li>• No material shall be left on site that may harm man or animals;</li> </ul>	1	<p>No materials with the potential to harm man or animals were located on site.</p>	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
• Broken, damaged and unused material shall be picked up and removed from site;	1	Excess material from the contractors is sent to Eskom for safe management and disposal.	
• Surplus concrete may not be dumped indiscriminately on site, but shall be disposed of in designated areas as agreed by the Landowner;	1	Surplus concrete is not dumped indiscriminately on-site. Concrete is treated as hazardous substance and disposed of appropriately.	
• Under no circumstances may solid waste be burned or buried on site unless a suitable incinerator is available;	1	No waste is burned. Burning of waste is strictly prohibited.	
• The washing of concrete trucks on site is prohibited. Any spilled concrete shall be cleaned up immediately;	1	Concrete is not washed on-site.	
• The Contractor must keep records (manifest) of waste removed from the property and made records available to authorities, ECO, auditors on request.	1	All records were provided. This includes permits, authorisations, and waste disposal slips.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
		Each contractor maintains their waste disposal records and submits them to the ECOs during audits.	
<ul style="list-style-type: none"> <li>A general site-wide litter clean-up will occur at least once a week; Wherever possible, materials will be recycled via a "Greens waste site". To this end, containers for glass, paper, metals, plastics, organic waste and hazardous wastes (eg. oil rags, paint containers, thinners) will be provided in sufficient quantity on the site;</li> </ul>	1	<p>All sites were clear of litter.</p> <p>Waste separation bins were available on-site.</p>	
<ul style="list-style-type: none"> <li>A certificate of disposal shall be obtained by the Contractor and kept on site for all hazardous waste disposed. All waste generated during construction and operation of the facility must be removed and disposed of at a licensed waste disposal facility;</li> </ul>	1	<p>All records were provided. This includes permits, authorisations, and waste disposal slips.</p> <p>Each contractor maintains their waste disposal records and submits them to the ECOs during audits. Waste</p>	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
		generated on-site is disposed of at a licensed facility.	
<ul style="list-style-type: none"> <li>Waste will be removed during off-peak traffic periods to minimise impacts on local traffic patterns; and</li> </ul>	1	Waste is removed at appropriate times.	
<ul style="list-style-type: none"> <li>Littering by the employees of the Contractor shall not be allowed.</li> </ul>	1	No litter was observed on-site.	
6.3.5. Management of Flora			
<ul style="list-style-type: none"> <li>Should Medicinal Plants be found on site, these plants will be demarcated and cordoned off;</li> </ul>	-	This condition is noted. No medicinal plants have been found on-site during this auditing period.	
<ul style="list-style-type: none"> <li>Only indigenous vegetation is to be used in any landscaping and rehabilitation which may be undertaken,</li> </ul>	1	Progressive rehabilitation has occurred in some areas. Indigenous vegetation was used for rehabilitation in these areas. Many sections of the project are still in the construction phase and have	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
		not undergone rehabilitation yet.	
<ul style="list-style-type: none"> <li>In situ conservation of Protected and Endangered Plant Species is preferable to ex situ conservation. Thus, should the plant species not "interfere" with the construction of a structure, the area surrounding the plant species shall be declared a "no-go" area and a buffer zone applied;</li> </ul>	1	Due to the nature of project locality, ex-situ approach is used where in-situ conservation approach is not possible.	
<ul style="list-style-type: none"> <li>The Contractor will be responsible for controlling all alien invasive species, as per the requirements of the Conservation of Agricultural Resources Act (CARA), during the contract and vegetation establishment period);</li> </ul>	1	Eradication of alien invasive species is underway.	We recommend follow-up eradication periodically to make sure that alien invasive plants that regrow are removed before they multiply.
<ul style="list-style-type: none"> <li>Alien invasive plant material will be preferentially removed in entirety through mechanical means (e.g. chainsaw, bulldozer, hand-pulling of smaller specimens);</li> </ul>	1	Mechanical methods are adopted for alien invasive removal strategies.	Stricter implementation and amendment of existing plans are required to ensure successful management of alien invasive species.

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>The exotic trees must be cut down leaving the stumps behind to ensure that soil erosion is prevented;</li> </ul>	N/A	No exotic trees were observed on-site.	
<ul style="list-style-type: none"> <li>The trees can be chipped on site and the chips seeded with indigenous vegetation and spread over the site to allow for re-growth and to reduce erosion potential;</li> </ul>	N/A	No exotic trees were observed on-site.	
<ul style="list-style-type: none"> <li>Immediately after being cut, an herbicide solution must be applied to the exotic trees to ensure no further growth. The person applying the herbicide must have read and understood the instructions. Care must be taken that there is no spillage of solution in the wetland and that the correct protective equipment must be used;</li> </ul>	N/A	No exotic trees were observed on-site.	
<ul style="list-style-type: none"> <li>If plants are not removed in entirety but cut-back and systematically treated with approved herbicides, then remaining plant will be monitored for re-growth / re-establishment;</li> </ul>	-	This condition is noted.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
• Herbicides used must be approved by authorities and as per the supplier's specifications.	-	This condition is noted.	
• If during the establishment period any noxious or excessive weed growth occurs, such vegetation will be removed;	1	Eradication of alien invasive species is underway.	
• It is recommended that the ECO be responsible for monitoring the nature and extent of on-site exotic, invasive plants;	1	ECOs are responsible for the monitoring of on-site exotic, invasive plants.	
• Clearing only the minimum area required for construction purposes;	1	Clearing of vegetation is only done on minimum areas required for activities.	
• Compile and implement an alien vegetation management method statement for the entire affected area;	1	Alien vegetation management plans are in place. However, medium densities of alien vegetation were noted during the audit.	
• Appoint suitably qualified professionals to undertake search and rescue operations for	1	The Eskom Generations Department ECOs are notified and undertake search-and-	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
Red Data plant species prior to vegetation clearing activities		rescue operations when required.	
<ul style="list-style-type: none"> <li>Construct an onsite nursery to take care of the rescued plants, should it be required;</li> </ul>	N/A	No need for an on-site nursery has been observed to date.	
<ul style="list-style-type: none"> <li>Conduct search and rescue operations for plant species of conservation importance; and</li> </ul>	1	The Eskom Generations Department ECOs are notified and undertake search-and-rescue operations when required.	
<ul style="list-style-type: none"> <li>Actively rehabilitate disturbed areas, and continue to monitor rehabilitation efforts.</li> </ul>	1	<p>ECOs are responsible for monitoring rehabilitation.</p> <p>Rehabilitation has occurred in some areas. Indigenous vegetation was used for rehabilitation in these areas.</p> <p>Many sections of the project are still in the construction phase and have not undergone rehabilitation yet.</p>	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
6.3.6. Management of storage and handling of hazardous material			
<ul style="list-style-type: none"> <li>• All contaminated soil shall be removed and be placed in containers. Contaminated material can be taken to one central point where bio-remediation can be done;</li> </ul>	1	A minor spillage occurred on the 29 <sup>th</sup> of July 2025. The spillage was contained and cleaned. The source of spillage was a burst pipe underneath a TLD. The TLD was taken out of operation for immediate repair	
<ul style="list-style-type: none"> <li>• All potentially hazardous raw and waste materials are to be handled by the Contractor's trained staff and stored on site in accordance with manufacturer's instructions and legal requirements</li> </ul>	1	Spill kits are available for the removal of contaminated soils due to spillage. Emergency preparedness plans and method statements dealing with the management of hazardous substances are in place.	
<ul style="list-style-type: none"> <li>• Areas for the storage of fuel and other flammable materials shall comply with standard fire safety regulations;</li> </ul>	1	Areas for the storage of fuel and other flammable materials	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
		comply with standard fire safety regulations	
<ul style="list-style-type: none"> <li>The Contractor will document a fire reduction management plan. The plan will identify fire hazards and appropriate management measures to reduce the identified risks.</li> </ul>	1	There is a fire risk assessment plan in place	
<ul style="list-style-type: none"> <li>The relevant Material Safety Data Sheets (MSDS) shall be available on site. Procedures detailed in the MSDS shall be followed in the event of an emergency situation.</li> </ul>	1	The relevant MSDS were located at the hazardous storage facilities. Procedures are outlined.	
<ul style="list-style-type: none"> <li>Smaller spills can be treated on site;</li> </ul>	1	Small spills are treated on-site using spill kits.	
<ul style="list-style-type: none"> <li>All spills of hazardous substances must be reported to the ECO;</li> </ul>	1	Spillages are reported to the ECOs.	
<ul style="list-style-type: none"> <li>Ensure that potentially hazardous materials are identified and documented in a register.</li> </ul>	1	Potential hazardous substances are documented.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
• Products should be clearly labelled and symbolic safety/hazard warning signs should be provided;	1	Products are clearly labelled and symbols are provided at hazardous storage facilities.	
• Fuel and chemical depots) shall be located at least 100m from any water body;	1	Fuel and chemical storage areas are located over 100m from waterbodies.	
• Ensure proper spill kits are available on site and that staff have received training on its use,	1	Spill kits are available on-site. Contractor's EOs conduct training on the use of spill kits.	
• To prevent spillages, vehicles should be well maintained	1	Vehicles are maintained. Vehicles that are in poor condition are removed from the site.	
• Diesel and oil/grease should be stored in bunded areas that will allow any spillages to be easily and quickly isolated and prevent contamination of any soils or water.	1	Diesel and oil/grease is stored in bunded areas.	
• Spills should be cleaned up with approved absorbent material such as "Drizit" or "Spillsorb." These should be kept in	1	A minor spillage occurred on the 29 <sup>th</sup> of July 2025. The spillage was contained and	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
sufficient quantities on site to deal with small spills. Absorbent material and contaminated soil should be disposed of at a registered hazardous waste site;		cleaned. The source of spillage was a burst pipe underneath a TLD. The TLD was taken out of operation for immediate repair.  The absorbent material and the contaminated material are treated as hazardous waste and disposed of at a licensed hazardous waste landfill site.	
<ul style="list-style-type: none"> <li>• An emergency preparedness plan should be compiled and all construction staff aware of procedures in event of a spill;</li> </ul>	1	An emergency preparedness plan has been compiled and is in place. Employees are trained on the contents of the plan.	
<ul style="list-style-type: none"> <li>• Hazardous waste (e.g. oil, diesel, grease, PVC, tyres), should be stored in bunded/impermeable areas and disposed of appropriately at a registered landfill site. Potential spills or seepage of hazardous waste must be anticipated and prevented; and</li> </ul>	1	Hazardous waste is stored in a bunded area. The hazardous waste is then disposed of at an appropriately licensed facility.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>Should cement be used on site, the following mitigation measures apply:</li> </ul> <p>-Carefully control all on-site operations that involve the use of cement and concrete (this applies to areas other than the batching plant).</p> <p>-Limit cement and concrete mixing to single sites where possible.</p> <p>-Use plastic trays or liners when mixing cement and concrete: Do not mix cement and concrete directly on the ground.</p> <p>-Dispose of cement in the approved manner (solid waste concrete may be treated as inert construction rubble, but wet cement and liquid slurry, as well as cement powder must be treated as hazardous waste);</p>	1	<p>The measures listed are in place as required.</p> <p>Drip trays are used on-site. Cement-mixing is restricted to designated areas.</p> <p>Cement and concrete are treated as hazardous waste and disposed of appropriately.</p>	
<ul style="list-style-type: none"> <li>Workshop areas shall be monitored for oil and fuel spills and such spills shall be cleaned and remediated to the satisfaction of the ECO.</li> </ul>	1	<p>Workshop areas are monitored by the ECOs. Recommendations are made where necessary.</p>	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>Where possible and practical all maintenance of vehicles and equipment shall take place in the workshop area.</li> </ul>	1	Maintenance of vehicles and equipment is restricted to designated workshop areas.	
<ul style="list-style-type: none"> <li>No equipment shall be used which may cause irreparable damage to wetland areas. The contractor shall use alternative methods of construction in such areas.</li> </ul>	1	Wetland areas are demarcated as no-go zones. No construction is occurring in these areas.	
<ul style="list-style-type: none"> <li>No vehicles coming on sites must spill oil; and</li> </ul>	1	Vehicles and equipment on-site are inspected to ensure they do not spill oil.	
<ul style="list-style-type: none"> <li>No construction equipment, vehicles or unauthorised personnel will be allowed onto areas that have been re-vegetated.</li> </ul>	1	No vehicles are allowed on sites that are newly rehabilitated.	
<ul style="list-style-type: none"> <li>The Contractor will ensure that delivery drivers are informed of all procedures and restrictions required by this document. Such drivers will be supervised during off-loading by a person knowledgeable of the requirements.</li> </ul>	1	The Contractor's EO is responsible for ensuring delivery drivers are compliant with the management measures of this EMPr.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>Materials will be appropriately secured to ensure safe passage between destinations. Loose loads (e.g. sand, stone chip, fine vegetation, refuse, paper and cement) will be covered</li> </ul>	-	This condition is noted.	
<ul style="list-style-type: none"> <li>The Contractor will be responsible for any clean-up resulting from the failure by his employees or suppliers to properly secure transported materials.</li> </ul>	-	This condition is noted.	
<ul style="list-style-type: none"> <li>All material lay-down areas and stockpiles will be subject to the Site Manager's approval.</li> </ul>	-	This condition is noted.	
<ul style="list-style-type: none"> <li>Imported fill / soil / sand materials will be free of weeds, litter and contaminants.</li> </ul>	-	This condition is noted.	
<ul style="list-style-type: none"> <li>Storage areas will be roofed in an impervious material, with a suitable overhang or side cladding. Rainwater run-off will be channelled away from the storage area as required.</li> </ul>	1	Storage areas are adequately roofed.	
6.3.7. Management of ambient air quality			

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>• All topsoil stockpiles to be protected from wind erosion by any means deemed effective, approved by ECO. Cleared areas should be monitored and dust suppression by means of spraying water on the ground, rehabilitate the area post construction).</li> </ul>	1	Dust suppression using water bowsers is undertaken.	
<ul style="list-style-type: none"> <li>• Dust suppression through the use of water bowsers should be implemented on all exposed areas including roads, parking zones and lay down areas. Water spraying on high use roads should be prioritised;</li> </ul>	1	Dust suppression using water bowsers is undertaken.	
<ul style="list-style-type: none"> <li>• Dust control measures, such as watering, chemical stabilisation and the reduction of surface wind speed through the use of windbreaks and source enclosures must be put in place during construction activities. Emission control efficiencies of 50% can readily be achieved through the implementation of effective watering programme for unpaved roads and material handling points;</li> </ul>	1	Dust suppression using water bowsers is undertaken. This method was observed as effective on the day of the audit.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>Regularly inspect existing erosion sites or those potentially susceptible to erosion;</li> </ul>	1	The ECOs monitor all sites regularly. Monthly reports are available.	
<ul style="list-style-type: none"> <li>All sites displaying incidence of erosion must be actively stabilised and re-vegetated;</li> </ul>	1	Erosion control measures are implemented where necessary.	
<ul style="list-style-type: none"> <li>All disturbed areas should be re-vegetated with indigenous species as per an approved rehabilitation plan; and</li> </ul>	1	Where the rehabilitation phase has been reached, indigenous vegetation is used.	
<ul style="list-style-type: none"> <li>All onsite traffic can be restricted to specific designated roads. Off-road travel can only be authorised on a case-by-case basis (e.g. access to a remote monitoring well, etc.).</li> </ul>	1	Designated roads are used for travel. Off-road driving is limited.	
6.3.8. Storm Water Management			
<ul style="list-style-type: none"> <li>Suitable erosion containment structures shall be constructed at donga crossings where required and viable;</li> </ul>	1	Erosion control measures, such as berms and silt fences, are in place.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>No unplanned / improperly planned cutting of donga embankments is allowed as this leads to erosion and degradation of the environment;</li> </ul>	1	<p>No unplanned/improper cutting of donga embankments is permitted on-site.</p> <p>Erosion control measures such as berms and silt fences are in place.</p>	
<ul style="list-style-type: none"> <li>Storm water flowing from the footprint of the proposed development may not be contaminated by any substances, whether the substance is solid, liquid or vapour or any combination thereof;</li> </ul>	1	<p>Clean water and dirty water are separated by channels to ensure contamination of clean water does not occur.</p>	
<ul style="list-style-type: none"> <li>During construction, the Contractor will protect areas susceptible to erosion by installing necessary temporary and / or permanent drainage works as soon as possible and by taking suitable measures to prevent surface water concentration into nearby roadways or river courses;</li> </ul>	1	<p>Silt fences and terracing was observed on site as a means to limit erosion.</p>	
<ul style="list-style-type: none"> <li>Silt trap mechanisms will be installed on all temporary storm water channels. These silt</li> </ul>	1	<p>Silt fences and sediment barriers are installed in strategic areas. Regular</p>	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
traps will be regularly checked and serviced as required;		maintenance is undertaken by the respective contractors.	
<ul style="list-style-type: none"> <li>All excavated and filled slopes and stockpiles must be of a stable angle and capable of accommodating normal expected flows;</li> </ul>	1	Slopes and stockpiles are monitored by ECOs to ensure the stability of angles. Recommendations are made where necessary.	
<ul style="list-style-type: none"> <li>Stabilisation of cleared areas to prevent and control erosion will be actively managed. The method chosen (e.g. watering, planting, retaining structures, commercial anti-erosion compounds) will be selected according to specifics and ensure acceptable rehabilitation.</li> </ul>	1	Slopes and stockpiles are monitored by ECOs to ensure the stability of angles. Recommendations are made where necessary.	
<ul style="list-style-type: none"> <li>Traffic and movement over stabilised areas will be restricted. Any damage to stabilised areas will be repaired and maintained to the satisfaction of the Site Manager;</li> </ul>	1	There are routes designated for traffic. These routes do not compromise the stability of an area.	
<ul style="list-style-type: none"> <li>Where erosion and sedimentation occur, rectification will be carried out in accordance</li> </ul>	1	An erosion management plan is in place.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
with details specified by the Project Manager;			
<ul style="list-style-type: none"> <li>Storm water berms and trenches should be located so that all 'clean' water from the catchment upslope of the ADF and soil stockpiles is diverted around it and into the downslope wetland areas. Sediments should be trapped before discharge into wetlands or watercourses. Ensure adequate flow attenuation within storm water trenches and at pond outlets. There should be a vegetated buffer between storm water outlets and downstream wetlands;</li> </ul>	1	<p>Stormwater diversion channels are constructed in strategic areas to separate clean and dirty water.</p> <p>Sediment traps and fences are installed where required.</p>	
<ul style="list-style-type: none"> <li>Storm water management should be applied at a catchment scale;</li> </ul>	1	An approved stormwater management plan is in place.	
<ul style="list-style-type: none"> <li>Comply with GN704 promulgated under the National Water Act, 1998 (36 of 1998) in relation to storm water measures so that sediment transport off site is minimised and clean water is diverted around the cleared area;</li> </ul>	N/A	GN704 auditing will commence during operational phase.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>Maintain sediment traps as part of the storm water management plan where necessary and especially upstream of discharge points where erosion protection measures and energy dissipaters should be in place; and</li> </ul>	1	Sediment traps, silt fences, and berms are installed as per the approved stormwater management plan.	
<ul style="list-style-type: none"> <li>Maintain a water quality monitoring programme.</li> </ul>	1	A water quality monitoring programme is in place.	
6.3.9. Access Roads			
<ul style="list-style-type: none"> <li>Markers shall show the direction of travel;</li> </ul>	1	Markers indicating the direction of traffic were observed on-site.	
<ul style="list-style-type: none"> <li>Roads not to be used shall be marked with a "NO ENTRY" sign;</li> </ul>	1	No entry signs are in place at applicable locations.	
<ul style="list-style-type: none"> <li>Where required, speed limits shall be indicated and speed control measures applied on the roads;</li> </ul>	1	Speed limit signs are indicated where necessary.	
<ul style="list-style-type: none"> <li>Water diversion berms shall be installed from the start of the contract;</li> </ul>	N/A	No water diversion berms on roads have been installed yet.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
		This will be done in later stages of the construction phase.	
<ul style="list-style-type: none"> <li>Where berms are installed on severe slopes the outflow shall be suitably stone pitched to prevent erosion from starting at the base of the berm;</li> </ul>	N/A	No water diversion berms on roads have been installed yet. This will be done in later stages of the construction phase.	
<ul style="list-style-type: none"> <li>Permanently wet areas are shown on the profiles. No vehicular traffic shall be allowed in such areas. Only existing roads through such areas may be used with the approval of Eskom;</li> </ul>	-	This condition is noted.	
<ul style="list-style-type: none"> <li>A temporal short right turn lane is recommended at the access on the north approach along D686 Road to improve safety for both the turning vehicles and the through traffic on D686 Road;</li> </ul>	N/A	The construction of the access road was abandoned.	
<ul style="list-style-type: none"> <li>Where new access roads are constructed, this must be done in accordance with TRMSCAAC1 REV 3 Section 4.4;</li> </ul>	1	All access roads are constructed according to Eskom standards as stipulated	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
		in TRMSAAC1 REV 3 Section 4.4.	
<ul style="list-style-type: none"> <li>• Berms shall be maintained at all times;</li> </ul>	1	Existing berms are maintained in good condition. Figure 12	
<ul style="list-style-type: none"> <li>• No roads shall be constructed on slopes of more than 20 % unless such roads follow contours;</li> </ul>	1	Roads are constructed as per approved designs.	
<ul style="list-style-type: none"> <li>• In wet areas the Contractor shall only use existing roads or alternative methods of construction. The Contractor shall take such areas into consideration during the tender;</li> </ul>	1	No construction occurs in wet areas.	
<ul style="list-style-type: none"> <li>• The installation of concrete pipes and drifts, to facilitate access, shall be at the discretion of the Environmental Control Officer on site;</li> </ul>	1	The ECOs are consulted when new roads or installations are to occur.	
<ul style="list-style-type: none"> <li>• Any dangerous crossings shall be marked as such and where necessary, speed limits shall be enforced; and</li> </ul>	1	Speed limits are enforced where necessary. Dangerous crossings are indicated as such.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>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.</li> </ul>	N/A	No private access roads are used.	
6.3.10. Noise Management			
The noise management measures provided in this section is also applicable to the operation and decommissioning phases of the KPS continuous ADF project			
<ul style="list-style-type: none"> <li>Noise-making construction works should be done during normal daily working times</li> </ul>	1	Work is restricted to normal working time.	
<ul style="list-style-type: none"> <li>If certain construction requires work outside of these hours, all adjacent landowners have to be informed prior to any construction outside of the specified hours commencing</li> </ul>	N/A	No work occurs outside of normal working hours of between 07h00 and 17h00.	
<ul style="list-style-type: none"> <li>Regular maintenance and inspection of ALL noise generating equipment</li> </ul>	1	All noise-generating equipment is inspected.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
		Noise monitoring reports indicate that noise levels from the site are standard.	
6.3.11. Building, Civils, and Structural Steel Work			
<ul style="list-style-type: none"> <li>• Steel work</li> </ul> <p>- All steel off-cuts must be collected for recycling purposes; and</p> <p>- During steel cutting and grinding, all old discs must be managed and must not become litter</p>	1	All steel cut-offs and scraps are sent to Eskom for proper management and disposal.	
<ul style="list-style-type: none"> <li>• Excavate foundations</li> </ul> <p>- Spoil must be evenly spread; and</p> <p>- Ensure that the topsoil is kept separate during excavations and that separate layers of soils are returned as they were removed.</p>	1	<p>Spoil is evenly spread.</p> <p>Topsoil is separated from subsoils.</p>	
<ul style="list-style-type: none"> <li>• Mixing concrete</li> </ul> <p>- During the mixing of concrete, concrete dust is emanated. Workers mixing concrete must wear Personal Protective Equipment, and</p>	1	Workers are provided with PPE.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
- Cement bags must not become litter after use. They must be disposed of in bins/Skips (see Waste Management).		Cement bags are treated as hazardous waste and disposed of appropriately.	
6.3.12. Visual Impact Management			
<ul style="list-style-type: none"> <li>Dust suppression techniques should be in place at all times.</li> </ul>	1	Water-spraying as a means of dust suppression is undertaken continuously throughout the day.	
<ul style="list-style-type: none"> <li>Avoid high pole top security lighting along the periphery of the project area if possible.</li> </ul>	1	The use of high pole top security lighting along the periphery of the project area is limited to security posts.	
<ul style="list-style-type: none"> <li>Rehabilitate / restore exposed areas as soon as possible after construction activities are complete.</li> </ul>	N/A	The project is still in the construction phase.	
6.3.13. Groundwater Management			
<ul style="list-style-type: none"> <li>The water removed from underground could be re-injected into the groundwater table downstream of ADF activities Appropriate</li> </ul>	N/A	No water is being abstracted from the underground.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
monitoring of such water quality should be taken to ensure that the quality complies with groundwater quality reserve;			
<ul style="list-style-type: none"> <li>During construction groundwater levels and quality shall be monitored;</li> </ul>	1	Groundwater quality monitoring is conducted.	
<ul style="list-style-type: none"> <li>The drilling of any observation or pumping well shall ensure consistent, effective and safe performance of the well;</li> </ul>	-	This condition is noted. No wells have been drilled.	
<ul style="list-style-type: none"> <li>Any pumping well needs to be equipped with flow metering devices to quantify water removed and recording should be continuous;</li> </ul>	N/A	There are no pumping wells on-site at this current phase of the project. No flow metering devices are installed.	
<ul style="list-style-type: none"> <li>Calibration certificates of water flow metering devices need to be established and be submitted to the appropriate authority after it has been installed and at regular intervals (02 years);</li> </ul>	N/A	There are no pumping wells on-site at this current phase of the project and there are not flow metering devices.	
<ul style="list-style-type: none"> <li>Analysis shall be carried out in accordance with the methods prescribed by the South African Bureau of Standards, in terms of the Standards Act 340 of 1982. The analysis</li> </ul>	1	Analysis is conducted in accordance with the methods prescribed by the South African Bureau of Standards, in	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
methods shall not be changed without prior written approval;		terms of the Standards Act 340 of 1982.	
• Monitoring points shall not be changed without prior written approval;	1	Monitoring points have not been changed during this auditing period.	
• Measurements shall be taken to prevent and provide for mechanical, electrical or operational failures of the pumping system;	N/A	This condition applies to the operational phase. The project is currently in the construction phase.	
• Any leak or failure of dams, and/or trenches should be reported to Department of Water and Sanitation and repaired accordingly;	N/A	This condition applies to the operational phase. The project is currently in the construction phase.	
• A proper construction phase should be carried out under the supervision of an accredited or recognised professional civil engineer, as approved by the designer; and	1	All construction works are undertaken under the supervision of registered professional engineer (Franco Giorgio Small, Reg No. 20170153). with ECSA.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>Lining and sealing of proposed new continuous ash disposal facility as per engineering designs will reduce the risk of groundwater contamination.</li> </ul>	1	The new ash disposal facility is lined with a class C liner as per engineering designs.	
6.4. Operational Phase			
6.4.1. Building, Civils and Structural Steelwork			
During site take/hand over, the site must be accepted from the contractor and handed over.	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
6.4.2. Groundwater Management			
<ul style="list-style-type: none"> <li>Short term test pumping and/or slug testing of selected existing monitoring borehole representative of all aquifer types, should be conducted to provide hydraulic parameters to update the groundwater conceptual model. Update the initial groundwater conceptual model with aquifer parameters which provide the basic input into a groundwater numerical model;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>As part of the mitigation and management of the Kendal operation a numerical groundwater model should be constructed to be able to predict the contaminant migration (if any);</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
<ul style="list-style-type: none"> <li>Survey monitoring borehole altitudes to construct a detail groundwater piezometric contour map and to accurately distinguish between deep and shall aquifer water levels (perched water level);</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
<ul style="list-style-type: none"> <li>Scavenger borehole system at the two water quality outliers (AB08) may contain/deplete the development of these local plumes although the source of potential contamination needs to be investigated;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
<ul style="list-style-type: none"> <li>The recommended numerical model can then be used to predict the impact of the trench on potential contaminant migration;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
<ul style="list-style-type: none"> <li>Although existing groundwater monitoring is sufficient as baseline, expansion/ optimisation of the groundwater monitoring</li> </ul>	N/A	The project is in the construction phase. This	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
network is recommended to form part of the mitigation and management of the ash dump, to cover the outline of the proposed Continuous ADF area. This will be included in the monitoring network and will be used as a warning system for contaminant migration;		condition is applicable to the operational phase.	
• Continuous water monitoring should be conducted;	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
• The drilling of any observation or pumping well shall ensure consistent, effective and safe performance of the well;	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
• Any pumping well needs to be equipped with flow metering devices to quantify water removed and recording should be continuous;	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
• Calibration certificates of water flow metering devices need to be established	N/A	The project is in the construction phase. This	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
and be submitted to the appropriate authority after it has been installed and at regular intervals (02 years);		condition is applicable to the operational phase.	
• During operation groundwater levels and quality shall be monitored;	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
• Analysis shall be carried out in accordance with the methods prescribed by the South African Bureau of Standards, in terms of the Standards Act 340 of 1982. The analysis methods shall not be changed without prior written approval;	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
• Monitoring points shall not be changed without prior written approval;	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
• Measurements shall be taken to prevent and provide for mechanical, electrical or operational failures of the pumping system;	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>Any leak, or failure of dams, and/or trenches should be reported to Department of Water and Sanitation and repaired accordingly;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
<ul style="list-style-type: none"> <li>Proper operation and maintenance of contaminated water trenches and dams; and</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
<ul style="list-style-type: none"> <li>ADF and all pollution control facilities (dams, trenches) must be operated to have a minimum freeboard above full supply level, at such manner that they can always handle 1:50 year flood-event on top of its mean operation level.</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
6.4.3. Access Roads			
<ul style="list-style-type: none"> <li>All speed limits shall be strictly adhered to at all times;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
• Berms shall be maintained at all times;	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
• Monthly inspection of all access roads;	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
• Any dangerous crossing shall be marked as such and where necessary, speed limits shall be enforced, and	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
• All existing private access roads used for operation purposes, shall be maintained at all times to ensure that the local people have free access to and from their properties.	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
6.4.4. Continuous Ash Disposal Facility			
• Regular watering of exposed ash by maintaining surface ash to approximately	N/A	The project is in the construction phase. This	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
5% water content to prevent erosion and dust;		condition is applicable to the operational phase.	
• Covering exposed ash with topsoil to stabilise surface ash;	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
• Re-vegetation of ash disposal facility with deeper top soil layer and supplemented seed bank;	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
• Monitoring of dust-fall rates (via dust bucket network) and ambient air quality (via PM10 monitoring); and	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
• Inspection of re-vegetated areas to document areas needing attention.	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<p>Resources that will be required for the implementation of the aforementioned management measures will include water and watering infrastructure, topsoil stockpile, appropriate seed stock, dust buckets, stands, personnel, PM monitoring equipment, camera and GPS. The following criteria will be indicative of the effectiveness of the aforementioned management measures:</p> <ul style="list-style-type: none"> <li>• Surface ash maintained at a constant approximately 5% water content</li> <li>• Surface ash constantly stable</li> <li>• Successful re-vegetation of ash disposal facility</li> <li>• Dust-fall rates and PM10 monitoring data analysis</li> <li>• Documented attention-needing areas</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
6.1.5. Management of Flora			
• A suitable rehabilitation programme should be developed and implemented at all disturbed areas;	N/A	The project is in the construction phase. This	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
		condition is applicable to the operational phase.	
<ul style="list-style-type: none"> <li>It is recommended that only indigenous grasses be used for rehabilitation. Suggested species include: <i>Cynodon dactylon</i>, <i>Digitaria eriantha</i>, <i>Eragrostis curvula</i>, <i>Eragrostis plana</i>, <i>Eragrostis racemosa</i>, <i>Heteropogon contortus</i>, <i>Hyparrhenia hirta</i>, <i>Sporobolus africana</i> and <i>Themeda triandra</i>,</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
<ul style="list-style-type: none"> <li>It is recommended that regular monitoring of rehabilitated areas, by a qualified ECO, be undertaken to ensure successful stabilisation and re-vegetation of disturbed areas;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
<ul style="list-style-type: none"> <li>Permanent berms and sediment traps should be constructed around project infrastructure where surface water run-off and erosion is likely;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
<ul style="list-style-type: none"> <li>All exposed sites or sites displaying incidence of erosion must be actively stabilised and re-vegetated;</li> </ul>	N/A	The project is in the construction phase. This	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
		condition is applicable to the operational phase.	
<ul style="list-style-type: none"> <li>• All temporary/permanent stockpiles and cleared areas should be re-vegetated, covered or kept moist to prevent dust generation;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
<ul style="list-style-type: none"> <li>• Dust suppression through the use of water bowsers should be implemented on all exposed areas including the ADF, access roads, parking zones and lay down areas;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
<ul style="list-style-type: none"> <li>• Water spraying on high use roads should be prioritised;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
<ul style="list-style-type: none"> <li>• All disturbed areas should be re-vegetated with indigenous grass species;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>An exotic species control programme including monitoring, must be developed and implemented to reduce the encroachment of exotic invasive species; and</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
<ul style="list-style-type: none"> <li>It is recommended that the ECO be responsible for monitoring the nature and extent of on-site exotic, invasive plants.</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
<ul style="list-style-type: none"> <li>A suitable rehabilitation programme should be developed and implemented at all disturbed areas;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
6.4.6. Fauna Management			
<ul style="list-style-type: none"> <li>The members of Kendal Power Station Environmental Management Division should be onsite during all operational activities to monitor for and manage any wildlife-human interactions;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>• A low-speed limit should be enforced on site to reduce wildlife-collisions; and</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
<ul style="list-style-type: none"> <li>• Employees and contractors should be made aware of the presence of, and rules regarding fauna through suitable induction training and on-site signage</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
6.4.7. Management of Infrastructure			
<ul style="list-style-type: none"> <li>• Upon completion of the project all access roads that were used during the construction phase infrastructure shall be repaired to their original state.</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
6.4.8. Access Management			
<ul style="list-style-type: none"> <li>• Wetland areas, together with their buffers, should be cordoned off and considered no-go areas as far as possible. Vehicular traffic in particular should be prohibited from entering wetland areas;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
• Soil stockpiles and toilet facilities should be placed outside of wetland areas;	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
• All construction staff should be informed of the sensitivity of the wetlands; and	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
• All activities within wetland areas (including rehabilitation) require a Water Use Licence.	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
6.4.9. Management of Watercourses			
• Clean and dirty water must be separated to comply with GN 704; and	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
• The functioning of the three-dam system should be addressed, so that they function as originally intended;	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
• Monitoring of the stream diversion rehabilitation and Aquatic biota should be conducted;	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
• If the clean and dirty water systems are operated as originally intended and to comply with GN 704 promulgated under the National Water Act, 1998 (36 of 1998) only clean water will report to the clean water dam and can then be released to the resource;	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
• Ensure all clean water and water derived from the upstream catchment are diverted around the ADF and discharged back into downstream water resources;	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>• All discharge points should incorporate sediment barriers or sediment traps designed to cope with the flow velocities and volumes at the point of discharge;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
<ul style="list-style-type: none"> <li>• All discharge points should be regularly inspected for signs of erosion, sediment deposition or obstructions; and</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
<ul style="list-style-type: none"> <li>• The stream diversion should ideally be vegetated along its full width. This will maintain surface roughness and aid in slowing down flows and contribute towards flood attenuation and sediment trapping.</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
Management measures relating to the prevention of water deterioration due to seepage out of ADF include:			
<ul style="list-style-type: none"> <li>• Water management infrastructure should be sized as per best practice guidelines and should be able to cope with 1.50-year storm events without overflowing as a minimum;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>Water management infrastructure should be regularly inspected and maintained fully functional at all times. Implement a water quality monitoring plan; and</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
<ul style="list-style-type: none"> <li>An emergency response plan for handling large spills or leaks due to infrastructure failure must be compiled and put in place, with regular practice drills to ensure its effectiveness.</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
Management measures relating to the prevention of increased sediment transport into wetlands include:			
<ul style="list-style-type: none"> <li>Install sediment barriers and/or low berms along the downslope edge of cleared areas to trap sediments on site. Design of sediment barriers should be such that expected flow velocities will not damage the barriers or impair their function. Regular cleaning and maintenance of the barriers should be undertaken;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
• Install sediment traps as part of the storm water management plan where necessary upstream of discharge points;	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
• Divert clean water around the cleared area and install erosion protection measures and energy dissipaters at points of discharge;	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
• Storm water and clean water discharge points should be protected against erosion;	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
• Discharge points should incorporate energy dissipaters and erosion protection;	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
• Concentrated, high velocity flows should be avoided;	N/A	The project is in the construction phase. This	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
		condition is applicable to the operational phase.	
<ul style="list-style-type: none"> <li>• All discharge points should be regularly inspected for signs of erosion, sediment deposition or obstructions;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
<ul style="list-style-type: none"> <li>• The gradient of the stream diversions should be kept as low as possible;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
<ul style="list-style-type: none"> <li>• Following construction activities the entire diversion floor should be landscaped to remove all obstacles and ruts that could lead to the formation of preferential flow paths;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
<ul style="list-style-type: none"> <li>• Re-vegetation of the stream diversion floor should proceed naturally and establish rapidly if sufficient flow through the wetland is available. Should exceptionally low flows be encountered due to drought conditions, seeding of the diversion might be required to</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
ensure rapid vegetation establishment. Regular, monthly monitoring of the stream diversion will thus be required until vegetation cover has been established across the full stream diversion; and			
<ul style="list-style-type: none"> <li>More terrestrial areas such as the side slopes of the stream diversions will not re-vegetate naturally and should be seeded with a suitable mix of indigenous Highveld grasses.</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the operational phase.	
6.5. Decommissioning Phase			
6.5.1. Site Decommissioning			
<ul style="list-style-type: none"> <li>All areas where site infrastructure or camp sites were established, and will be removed, must be rehabilitated to an acceptable condition or where possible their original state in which they were found.</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>Prior to the removal of structures an assessment of the end land use will be undertaken to determine which structures will be removed or retained.</li> </ul>	N/A	The project is in the construction phase. This	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
		condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>Any specific requirements to prevent pollution during demolition of structures must be identified prior to the commencement of rehabilitation activities.</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>Disposal requirements must be identified prior to the commencement of rehabilitation or structure removal.</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>Equipment, structures and building material that can be reused will be identified prior to the commencement of rehabilitation activities.</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>Scrap metal and equipment will be sold as scrap or disposed of at a suitably licensed facility;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>Vegetation that was removed for the establishment of site infrastructure shall be reinstated into the area; and</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>Should any claim be instituted against EM, due to the actions of the Contractor at a batching plant site, EM shall hold the Contractor fully responsible for the claim until such time that the Contractor can prove otherwise with the necessary documentation.</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
6.5.2. Management of Watercourses			
<ul style="list-style-type: none"> <li>Any runnels or erosion channels will be backfilled and compacted, and the areas restored to a proper condition; and</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>Refer to <b>Chapter 6.3.2</b> of this document</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>• Comply with Government Notice 704 promulgated under the National Water Act, 1998 (36 of 1998) in relation to storm water measures so that sediment transport off site is minimised and clean water is diverted around the cleared area;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>• Maintain sediment traps as part of the storm water management plan where necessary and especially upstream of discharge points where erosion protection measures and energy dissipaters should be in place; and</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>• Maintain the water quality monitoring programme at closure and post-closure</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
6.5.3. Ash Disposal Facility			
<ul style="list-style-type: none"> <li>• Ensure that the re-seeding of the Continuous ADF is done on disturbed areas as directed by the Environmental Control Officer;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>Other methods of rehabilitation of the sites may also be used at the discretion of the Environmental Control Officer, e.g. stone pitching, logging, etc; and</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>A mixture of seed can be used provided the mixture is carefully selected to ensure the following: <ul style="list-style-type: none"> <li>- Annual and perennial plants are chosen;</li> <li>- Pioneer species are included;</li> <li>- All the plants shall not be edible;</li> <li>- Species chosen will grow in the area without many problems;</li> <li>- Root systems must have a binding effect on the soil; and</li> <li>- The final product should not cause an ecological imbalance in the area.</li> </ul> </li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
6.5.4. Building, Civils and Structural Steelwork			

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>During the de-establishment of the contractor's yard / store all waste, garbage, surplus materials and oils spills to be cleared and site must be rehabilitated;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>Upon completion of the project all roads and infrastructure shall be repaired to their original state;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>Ensure that existing infrastructure is taken into account during planning and project execution to eliminate impacts to existing infrastructure; and</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>During site inspection the site is to be cleared and rehabilitated back to its original state.</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
6.5.5. Management of Flora			
<ul style="list-style-type: none"> <li>If disturbed areas are left to rehabilitate naturally, they must be frequently monitored</li> </ul>	N/A	The project is in the construction phase. This	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
and interventions put in place immediately should it become necessary. Special attention must be given to the potential for soil erosion and the associated environmental degradation. It is also essential to undertake alien vegetation control and management;		condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>• No construction equipment, vehicles or unauthorised personnel will be allowed onto areas that have been re-vegetated;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>• Only persons / equipment required for maintenance thereof will be allowed to operate on such areas;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>• All plant material used on site will be obtained from an approved nursery;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
• The Contractor will remove plants containing any diseases from the site with approval from ECO	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
• Propagation of suitable indigenous vegetation that is quick to establish such as grasses, should be encouraged in areas where vegetation has been removed;	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
• On planting, there will be sufficient topsoil around each plant to prevent desiccation of the root system. Where plants are stored on site prior to planting they will be maintained to ensure that the root systems remain moist;	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
• Each plant brought onto site will be handled and packed in an approved manner for that species or variety, and that all necessary precautions are taken to ensure that the plants arrive on the site in a proper condition for successful growth (e.g. good plant specimens chosen, disease and/or pest	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
free, potting material weed free, plants covered during transportation, containers in good condition);			
<ul style="list-style-type: none"> <li>• All reseeding activities will be undertaken at the end of the dry season (middle to end September) to ensure optimal conditions for germination and rapid vegetation establishment;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>• The seed mix will be approved by the ECO prior to seeding;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>• Seeds should be covered by use of an agricultural roller or similar mechanism;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>• Inspect rehabilitated area at monthly intervals during the first and second growing season to determine the efficacy of rehabilitation measures;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>Take appropriate remedial action where vegetation establishment has not been successful or erosion is evident within the first two growing seasons;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>Alien plant control will be conducted for a period of two years after the rehabilitation phase is complete;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>Soils must be ripped to refusal or a minimum of 300mm prior to seeding;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>All areas must be profiled to tie in with adjacent terrain. Where necessary suitable soil must be imported obtain a suitable profile;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>An exotic species control programme, including monitoring, must be developed and implemented to reduce the encroachment of exotic invasive species;</li> </ul>	N/A	The project is in the construction phase. This	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
		condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>It is recommended that the ECO be responsible for monitoring the nature and extent of on-site exotic, invasive plants;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>In the event that Red Data/protected flora are identified within the designated construction footprints and require relocation, rescue permits must be obtained from the provincial or relevant authority, and a suitable ex-situ, and/or in-situ conservation plan developed. The conservation plan must be implementation and monitored by the ECO.</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>Apply a suitable mixture of N:P:K fertiliser prior to seeding;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>• Harrow the disturbed areas after spreading the topsoil and fertilizer uniformly; and</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>• Rehabilitated and profiled areas must be inspected for erosion every three months for the first two years. Additional measures must be implemented to remediate erosion where it is observed</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
6.5.6. Noise Impact Management			
<ul style="list-style-type: none"> <li>• In order to prevent noise impacts resulting from decommissioning activities, working hours are to be limited to weekdays between 7h00 to 17h00.</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>• If certain activities requires work outside of these hours, all adjacent landowners have to be notified prior to any decommissioning activities outside of the specified hours commencing.</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
6.5.7. Social Environment			

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
• Prepare employees for closure phase well in advance. Employee assistance programme can assist with mental and physical preparation of employees;	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
• Assist staff with finding alternative employment;	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
• Give referrals to regular suppliers, especially Small Micro Medium Enterprises, if possible;	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
• Follow IFC retrenchment guidelines; and	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
• Redeploy staff where possible.	N/A	The project is in the construction phase. This	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
		condition is applicable to the decommissioning phase.	
6.5.8. Groundwater Management			
<ul style="list-style-type: none"> <li>The drilling of any observation or pumping well shall ensure consistent, effective and safe performance of the well;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>Any pumping well needs to be equipped with flow metering devices to quantify water removed and recording should be continuous;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>Calibration certificates of water flow metering devices need to be established and be submitted to the appropriate authority after it has been installed and at regular intervals (02 years);</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>Analysis shall be carried out in accordance with the methods prescribed by the South African Bureau of Standards, in terms of the Standards Act 340 of 1982. The analysis</li> </ul>	N/A	The project is in the construction phase. This	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
methods shall not be changed without prior written approval;		condition is applicable to the decommissioning phase.	
• Monitoring points shall not be changed without prior written approval;	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
• Measurements shall be taken to prevent and provide for mechanical, electrical or operational failures of the pumping system;	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
• During closure and post closure, groundwater levels and quality shall be monitored.	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
• Any leak or failure of dams, and/or trenches should be reported to DWA and repaired accordingly,	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
• Repair trenches and dams as may be required,	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
• It is essential that the ADF, together with storm water drains and pollution control dams, be appropriately lined (according to the relevant waste classification), so that no contaminants reach the groundwater;	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
• Direct precipitation falling on ADF should be drained by the storm water management system to areas where infiltration could occur; and	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
• It is essential that the ADF, together with storm water drains and pollution control dams, be appropriately lined (according to the relevant waste classification), so that no contaminants reach the groundwater.	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
6.5.9. Visual Impact Management			

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>The ADF should be rehabilitated with the appropriate system ending with a good layer of topsoil on top where after it should be re-vegetated;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>Only use indigenous plant species; and</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>Ensure that all plant material has properly established during the maintenance phase.</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
6.5.10. Management of wetlands			
<ul style="list-style-type: none"> <li>Wetland areas, together with their buffers, should be cordoned off and considered no-go areas as far as possible. Vehicular traffic in particular should be prohibited from entering wetland areas;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>Soil stockpiles and toilet facilities should be placed outside of wetland areas;</li> </ul>	N/A	The project is in the construction phase. This	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
		condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>• All staff should be Indicator/Performance Criteria on the sensitivity of the wetlands;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>• All activities within wetland areas (including rehabilitation) require a Water Use Licence;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>• Disturbance of riparian areas should be minimised. Adjacent riparian areas should be cordoned off and considered no-go areas;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>• Ensure easy access for maintenance or clean ups during rehabilitation;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>• All wetland/riparian areas disturbed during construction should be rehabilitated immediately upon completion of construction;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>• Water management infrastructure should be sized as per best practice guidelines and Should be able to cope with 1:50 year storm events without overflowing as a minimum.</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>• Water management infrastructure should be regularly inspected and maintained fully functional at all times. Implement a water quality monitoring plan;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>• An emergency response plan for handling large spills or leaks due to infrastructure failure must be compiled and put in place, with regular practice drills to ensure its effectiveness;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>• Implement all dust suppression mitigation measures as detailed in the air quality specialist assessment,</li> </ul>	N/A	The project is in the construction phase. This	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
		condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>Implement a water quality monitoring plan to monitor potential impacts to water quality.</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>Implement corrective measures to address any water quality impairment that may be observed;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>Avoid additional wetland disturbances by limiting decommissioning activities to as small an area as possible, ideally within the disturbed footprint of the activities and infrastructure;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>Fence off all wetland areas falling outside the direct footprint of activities to limit impacts to these wetlands;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>Clearly demarcate the required decommissioning servitude in the field and limit all decommissioning activities to the demarcated area;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>No stockpiling of material may take place within the wetland areas and temporary contractor's camps and infrastructure should also be located at least 100m away from wetland areas falling outside the development footprint; and</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>Regular cleaning up of the wetland areas should be undertaken to remove litter.</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
Management measures which relate specifically to watercourse crossing include:	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>Disturbance of riparian areas should be minimised. Adjacent riparian areas should</li> </ul>	N/A	The project is in the construction phase. This	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
be cordoned off and considered no-go areas;		condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>• Ensure easy access for maintenance or clean ups during rehabilitation; and</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>• All wetland/riparian areas disturbed during construction should be rehabilitated immediately upon completion of construction.</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
6.5.11. Management of ambient air quality			
<ul style="list-style-type: none"> <li>• All topsoil stockpiles and cleared areas should be re-vegetated, covered or kept moist to prevent dust generation;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>• Dust suppression through the use of water bowsers should be implemented on all exposed areas including roads, parking</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
zones and lay down areas. Water spraying on high use roads should be prioritised;			
<ul style="list-style-type: none"> <li>• All disturbed areas should be re-vegetated with indigenous species as per an approved rehabilitation plan;</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>• All onsite traffic can be restricted to specific designated roads. Off-road travel can only be authorized on a case-by-case basis (e.g. access to a remote monitoring well, etc.). Traffic speed can also be restricted to an appropriate level on all designated roads; and</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>• Dust suppression techniques should be used to limit dust fall in wetland areas.</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
6.5.12. Management of Fauna			
<ul style="list-style-type: none"> <li>• A low speed limited should be enforced on site to reduce wild-collisions; and</li> </ul>	N/A	The project is in the construction phase. This	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
		condition is applicable to the decommissioning phase.	
<ul style="list-style-type: none"> <li>Employees and contractors should be made aware of the presence of, and rules regarding fauna through suitable induction training and on-site signage.</li> </ul>	N/A	The project is in the construction phase. This condition is applicable to the decommissioning phase.	
7. GENERAL REQUIREMENTS DURING CONSTRUCTION			
<ul style="list-style-type: none"> <li>Proper and continuous liaison between Eskom, the contractor and Landowners to ensure everyone is informed at all times;</li> </ul>	1	Eskom is responsible for maintaining liaisons with adjacent landowners. Contractors' activities with ECOs and Eskom.	
<ul style="list-style-type: none"> <li>A physical access plan shall be compiled and the contractor shall adhere to this plan at all times. Proper planning when the physical access plan is drawn up by the Environmental Control Officer in conjunction with the Contractor shall be necessary to</li> </ul>	1	Adequate access control measures are in place.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
ensure access to all construction areas within the route corridor parameter;			
<ul style="list-style-type: none"> <li>The adjacent landowners shall be informed of the starting date of construction as well as the phases in which the construction shall take place</li> </ul>	N/A	<p>The construction phase has commenced.</p>	
<ul style="list-style-type: none"> <li>The Contractor must adhere to all conditions of contract, including the Environmental Management Programme;</li> </ul>	1	<p>The independent ECOs conduct regular inspections and report on compliance monthly.</p> <p>The contractor has a contractual obligation to comply with the management measures in this EMPr.</p>	
<ul style="list-style-type: none"> <li>Proper planning of the construction process to allow for disruptions due to rain and very wet conditions;</li> </ul>	-	<p>This condition is noted.</p>	
<ul style="list-style-type: none"> <li>Where existing private roads are in a bad state of repair, such roads' condition shall be documented before they are used for construction purposes. If necessary, some</li> </ul>	N/A	<p>No private access roads are used.</p>	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
repairs should be done to prevent damage to equipment and plant;			
• Proper site management and regular monitoring of site works;	1	The ECOs are responsible for monitoring the site. Regular inspections and monthly reports are conducted.	
• Proper documentation and record keeping of all complaints and actions taken;	1	Incident registers and complaint registers are maintained.	
• Regular site inspections and good control over the construction process throughout the construction period;	1	The ECOs are responsible for monitoring the site. Regular inspections and monthly reports are conducted.	
• Appointment of an independent Environmental Control Officer during the Construction Phase of the KPS Continuous ADF Project to implement this EMPr as well as deal with all Landowner related matters; and	1	Independent ECOs conduct inspections and compile monthly audit reports.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<ul style="list-style-type: none"> <li>Environmental Audits to be carried out during and upon completion of construction (at least three for the project).</li> </ul>	1	<p>Independent ECOs conduct inspections and compile monthly audit reports.</p> <p>An external auditor is appointed to monitor compliance against the IEA and EMPr biannually. The most recent biannual audit was conducted by Kantey &amp; Templer (Pty) Ltd in June 2024.</p> <p>The project is still in the construction phase.</p>	
8. Site Documentation/Reporting			
<ul style="list-style-type: none"> <li>The standard Eskom site documentation shall be used to keep records on site. In addition all non-compliances to the environmental authorisation will be reported to the Department.</li> </ul>	1	<p>Eskom's EMS site is used to store and manage documentation related to the project. All non-compliances</p>	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
		are reported to the Department.	
<ul style="list-style-type: none"> <li>All documents shall be kept on site and be available for monitoring and auditing 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 legitimate</li> </ul>	1	All required documents were made available for audit or inspection purposes.	
<ul style="list-style-type: none"> <li>Regular monitoring of all site works by the Environmental Control Officer is imperative to ensure that all problems encountered are solved punctually and amicably.</li> </ul>	1	The appointed ECOs are responsible for monitoring compliance with the EMPr. All incidents are recorded, and recommendations are made to address incidents	
<ul style="list-style-type: none"> <li>The authorisation must be produced to any authorised official of the Department who requests to see it and must be made available for inspection by any employee or agent of the holder of the authorisation who</li> </ul>	1	A copy of the IEA and approved EMPr are stored electronically and available upon request.	

MANAGEMENT MEASURES	COMPLIANCE STATUS	COMMENTS	ACTION REQUIRED & TIMEFRAME
	CURRENT		
<p>works or undertakes work at the property. In addition the following documentation should also be kept onsite and be readily available:</p> <ul style="list-style-type: none"> <li>-Relevant permits</li> <li>-Method Statement</li> <li>-A daily site diary;</li> <li>-A non-conformation register, and</li> <li>-A public complaints</li> </ul>			

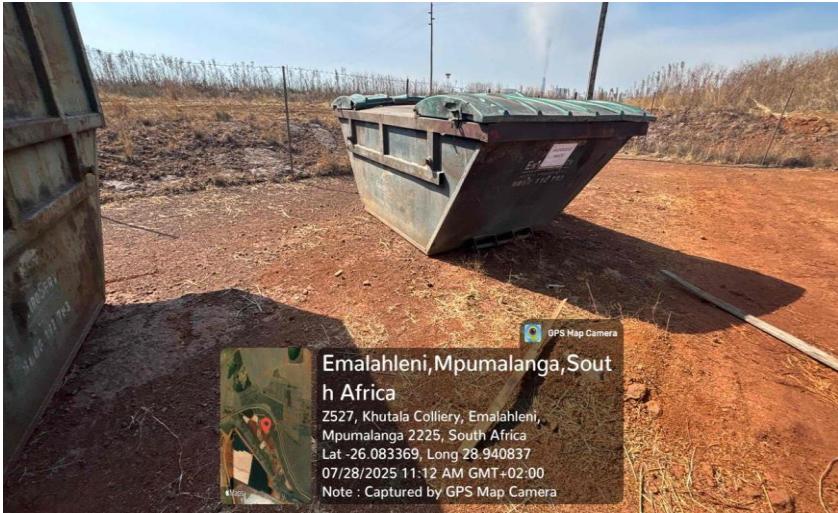
### APPENDIX 3: PHOTOGRAPHIC EVIDENCE



Figure 3 Access Signage at LFC Site



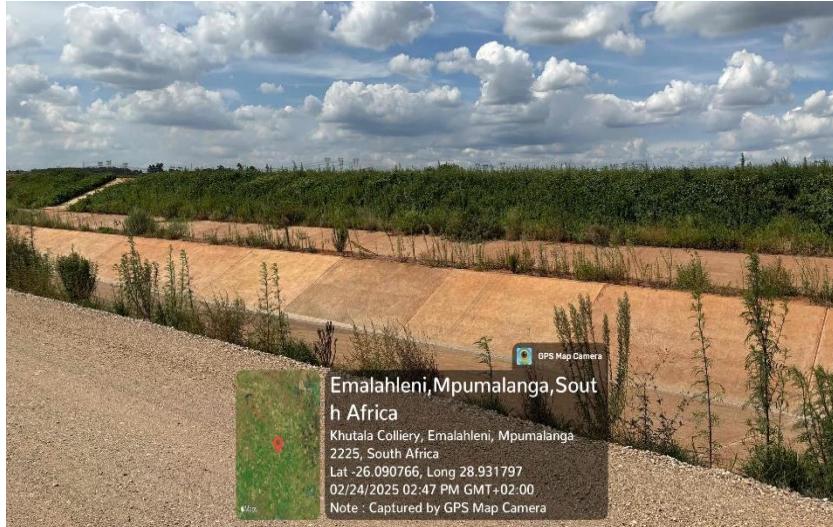
Figure 4 Spillage Resulting from TLB Burst Pipe



**Figure 5 Skip for Hazardous Waste Placed on Bare Ground**



**Figure 6 Clean V-Drain**



**Figure 7 Invasion of Alien and Invasive Plant During February 2025 Audit**



**Figure 8 Clearing of Alien and Invasive Plants During July 2025 Audit**



**Figure 9 Provision of Braai in Designated Area**



**Figure 10 Section Where Alien and Invasive Species Have Been Removed**



**Figure 11** Fire Extinguishers are Strategically Placed Throughout the Site



**Figure 12** Silt Built-Up is Adequately Controlled