# ESKOM DAGBREEK BYPASS PROJECT Environmental Management Plan

#### I. OBJECTIVES OF THE ENVIRONMENTAL MANAGEMENT PLAN

The compilation of this Environmental Management Plan (EMP) forms part of the requirements of the EIA Regulations 2014 (as amended) and compliance with the contents of this report is required during the construction and operational phases of the project. The EMP serves as an environmental management tool by providing a generic structured plan of mitigatory measures, which serves as a guide to assist in minimising the potential environmental impact of the activity that may arise during the construction and operational phases.

The EMP provides a set of guidelines for the environmental management of all works to be executed by the Engineer and Contractor, so as to have a minimum impact on the environment in accordance with all relevant legislation, policies and standards.

In this context it should be viewed as a dynamic or 'living' document, which may require updating, or revision during the life-cycle of the project to address new circumstances as the need arises. It is essentially a written plan of how the environment is to be managed in practical and achievable terms.

The effectiveness of the EMP is limited by the level of adherence to the conditions set forth in this report by the Developer and the Contractor. It is further assumed that compliance with the EMP will be monitored on a regular basis as set out in the EMP and contractual clauses.

The EMP forms part of the Contract Documentation and is thus a legally binding document. An individual responsible for environmental damage must pay costs both to environment and human health and the preventative measures to reduce or prevent additional pollution and/or environmental damage from occurring (the Polluter Pays Principle).

Further to the above, the following objectives apply:

- To state the standards and guidelines which Eskom will be required to adhere to in terms of environmental legislation;
- To set out the mitigation measures and environmental specifications which Eskom will be required to implement for the construction phase of the project in order to minimise the extent of environmental impacts, and where possible to improve the condition of the environment;
- To provide guidance regarding the method statements which Eskom will be required to compile and implement to achieve the environmental specification;
- To define corrective actions which Eskom must take in the event of non-compliance with the specifications
  of this EMP;
- To mitigate potential negative impact associated with the project and ensure optimising of positive impact;
- To prevent long-term or permanent environmental degradation;
- To ensure that the applicant, construction workers and the operational and maintenance staff are well acquainted with their responsibilities in terms of the environment;
- To ensure that communication channels to report on environment related issues are in place.

#### II. DETAILS OF THE PERSON WHO PREPARED THE EMP

This Environmental Management Plan was prepared by Landscape Dynamics cc, an environmental consultancy firm established in May 1997. Their core business involves the execution of Environmental Impact Assessments that include the compilation of Environmental Management Plans for all of these projects. The team members responsible for this project and the compilation of the EMP are Annelize Grobler (012 460 6043 / 082 566 4530 / agrobler@landscapedynamics.co.za), a qualified landscape architect specialising in the field of environmental impact assessments, and Susanna Nel (021 855 0912 / 082 888 4060 / susanna@landscapedynamics.co.za). A Company Profile and Condensed CVs of both Annelize Grobler and Susanna Nel are attached under Appendix H of the Basic Assessment Report compiled for this project.

# III. DETAILS OF THE PROPOSED ACTIVITY

The applicant is Eskom Holdings SOC Limited, Eskom Distribution – Western Operating Unit: Land Development. The contact person is Ms Justine Wyngaard at the Eskom offices in Brackenfell, Cape Town (Tel 021 980 3112 / 082 938 3479 / Fax 082 980 3503 / justine.wyngaardt@eskom.co.za).

# The project

The project entails the connection of two power lines which is on either side of a railway line by means of an approximate 380 meter 66kV bypass power line.

#### Route Corridor

A 140m wide route corridor is being investigated (70m on both sides of the proposed bypass power line). This route corridor must be approved by the Department of Environmental Affairs, which will allow for slight deviations of the power line within the approved corridor. Please note that Eskom will however only register the required servitude within the route corridor and *not* the entire corridor. The approval of the route corridor should be included in the Environmental Authorisation.

#### Location

The study area is north of Wellington and close to the small town of Hermon, directly east of the R44 provincial road in the Western Cape.

#### IV LEGAL REQUIREMENT

The applicable legislation in terms of the environment refers to procedures prescribed by the provisions of the Environmental Impact Assessment Regulations 2014 (as amended), made under Section 24 (5) of the National Environmental Management Act, 1998 (Act No 107 of 1998) (NEMA). Of particular importance is Section 28 (1) of NEMA which places an obligation on all individuals to take due care of the environment and to ensure remedial action is instituted to minimise and mitigate environmental impact.

The relevant applicable activities for which environmental authorisation had been applied for are:

# CN 983, Dec 2014, Number 11 The development of facilities or infrastructure for the transmission and distribution of electricity(i) outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts; or (ii) inside urban areas or industrial complexes with a capacity of 275 kilovolts or more

excluding the development of bypass infrastructure for the transmission and distribution of electricity where such bypass infrastructure is -

- (a) temporarily required to allow for maintenance of existing infrastructure;
- (b) 2 kilometres or shorter in length;
- (c) within an existing transmission line servitude; and
- (d) will be removed within 18 months of the commencement of development.

Application for environmental authorisation had been lodged with the Department of Environmental Affairs (DEA).

# V. DETAILS OF PERSONS RESPONSIBLE FOR IMPLEMENTATION OF EMP

The following undertaking must be filled out and signed by the applicant and forwarded to DEA prior to commencement of construction:

# AGREEMENT & UNDERTAKING OF THE APPLICANT

I hereby confirm and state that I am aware of the contents of the Environmental Management Plan and the conditions of the Environmental Management Plan and shall comply with all legislation pertaining to the nature of the work to be done and all things accidental thereto.

Signed on behalf of
Date:
Place:
Signature:
Full Name:
Postal Address:
Physical Address:
Office Telephone Number:
AGREEMENT & UNDERTAKING OF THE ENVIRONMENTAL CONTROL OFFICER
The following details of the Environmental Control Officer must be filled out, signed and forwarded to the Department of Environmental Affairs prior to construction:
Company Name:
Contact Person(s):
Dhysical Addross

Street Address:	
Office Telephone Number:	
Cell phone Number:	
Fax Number:	

# V. PROPOSED MECHANISM FOR COMPLIANCE

Key impacts generally associated with Eskom construction activities which are applicable to this project are:

- Impact on natural habitat (fauna and flora)
- Impact on cultural heritage resources
- Risk of groundwater pollution
- Risk of erosion
- Community Impact

Specifications and conditions are hereby provided to limit and/or prevent impact on these components during all the phases of project development, namely

- Specifications applicable throughout all Phases of Project Development
- Design & Pre-construction Phase
- Construction Phase
- Post-construction & Operational Phase

# ROLES AND RESPONSIBILITIES SPECIFICATIONS APPLICABLE THROUGHOUT ALL PHASES OF PROJECT DEVELOPMENT

#### DEPARTMENT OF ENVIRONMENTAL AFFAIRS

The National Department of Environmental Affairs (DEA) is the designated authority responsible for authorising this EMP. DEA has overall responsibility for ensuring that the Applicant complies with the conditions of Environmental Authorisation and the EMP.

DEA shall also be responsible for approving any amendments to the EMP (if required). DEA may also perform random site inspections to check compliance with the EMP.

### DEPARTMENT OF WATER AFFAIRS

The Department of Water Affairs has confirmed rights to inspect the project at any time to ensure compliance with relevant legislation.

# ESKOM HOLDINGS SOC LIMITED (DEVELOPER)

The Applicant is the Developer and has overall responsibility for compliance with the EMP as it is a fundamental component of the authorisation requirements for the project.

This means that the Developer must:

- Ensure that the professional team and the Contractors are appropriately briefed and that their appointment includes environmental requirements as relevant;
- Ensure that he/she is kept fully informed of the performance of the project against the requirements of the EMP:
- Ensure that appropriate action is taken where consistent incidents of non-compliance are taking place;
- Ensure that any corrective action required by the authorities is implemented.

# Project Co-ordinator (PC)

The primary responsibility of the Project Co-ordinator (PC) is to ensure that the Contractor complies with the environmental specifications in this document. In addition the PC shall:

- Assume overall responsibility for the effective implementation and administration of the EMP;
- Ensure that the EMP is included in the Contractors' contract (including all subcontractors);
- Ensure that the EMP and any other relevant documentation are provided to the applicable contractors;
- Inform the Eskom Environmental Practitioner of the date of construction at least 2 months in advance.

# Construction Supervisor and the Contractor (if utilised);

- Undertake regular inspections of the Contractor's site (in conjunction with the Clerk of Works, where
  relevant) as well as the powerline servitude in order to check for compliance with the EMP in terms of the
  specifications outlined in this document.
- Keep a register of major incidents (spills, injuries, complaints, legal transgressions, etc.) and any other relevant issues related to the EMP;
- Report any problems (or complaints) concerning the environment arising out of the construction phase to the appointed Environmental Control Officer;
- To ensure Contractor staff are trained in accordance with the EMP;
- To implement recommendations of possible audits.

# Site Environmental Representative

- Appoint an experienced Site Environmental Representative who represents the contractor and oversees
  the daily implementation of the EMP, Environmental Checklists, maintain incident and complaint registers,
  manage ad hoc incidents like oil spills, do induction/ environmental awareness training for all people
  access the construction site, coordinate waste disposal and separation (general housekeeping on site).
- The contractor Site Environmental Representative to have the following training, from a recognised or accredited institution:
  - Oil Spill Management Training
  - o Integrated Waste Management
  - o Environmental Awareness /Induction
  - o Tree Identification (vegetation management)
  - o Environmental Law Training
  - Environmental Authorisation\_Environmental Management Plan (EA\_EMP) Training
- The Site Environmental Representative to be permanently on site during construction.
- The Site Environmental Representative should have an appointment letter stipulating roles and responsibilities.

# Eskom construction team or external construction contractor and all subcontractors

The construction team / contractor / subcontractor shall:

- Ensure that the environmental specifications of this document are effectively implemented. This includes the on-site implementation of steps to mitigate environmental impacts;
- Monitor environmental performance and conformance with the specifications contained in this document during site inspections;
- Discuss implementation of and compliance with this document with staff at routine site meetings;
- Report non-compliances to EMP and Environmental Authorisation to PC and Environmental Control
  Officer (ECO) immediately (on discovery), within 24 hours of the event discovered or occurred;
- Report progress towards implementation of and non-conformances with this document at site meetings with the PC;
- Ensure that suitable records are kept and appropriate documentation is available to the PC; and
- Ensure that construction employees are trained in accordance with the requirements of the EMP.

The Contractor will conduct all activities in a manner that minimises disturbances to and impacts on the environment.

The Contractor is deemed not to have complied with this EMP if:

- There is evidence of contravention of clauses within the boundaries of the property and adjacent areas during the Construction Phase;
- If environmental damage ensues due to negligence;
- The Contractor fails to comply with corrective or other instructions issued by the Local Authority, PC, ECO, or the Developer within a specified time;
- Failure to take any reasonable measure to protect the environment if there is a perceived or identified environmental risk associated with an activity that has not been defined in the EMP; and
- The Contractor fails to respond adequately to complaints from the public.

Application of a penalty clause will apply for incidents of non-compliance as per the Schedule of Fines as mentioned below. Such fines will be paid by the Contractor to the Developer and will be used in rehabilitation and / or landscaping.

# **Environmental Control Officer (ECO)**

The key responsibility of the ECO is to ensure that all the conditions stipulated in the Environmental Authorisation are being adhered to and should monitor project compliance with the conditions of the Environmental Authorisation, environmental legislation and the recommendations of the EMP.

Furthermore, the duties of the ECO shall include, inter alia, the following:

- Ensuring the necessary environmental authorisations and permits, if any, has been obtained;
- Advising the Contractor on environmental issues within defined construction areas;
- Undertaking once-per-month site visits, or more if required to ensure compliance with this EMP;
- Completing environmental checklists during site visits and keeping a photographic record of progress on site from an environmental perspective;
- Reporting back on any environmental issues/incidents to the DEA as reported to by the Contractor; and ensure that DEA is informed of work progress on site;
- Preparing an environmental audit report at the conclusion of the construction phase.
- Attending site meetings where applicable and where necessary inspect the construction site on a regular basis to ensure that the mitigation and rehabilitation measures are applied.
- Make reasonable amendments to the EMP in co-operation with the contractor. Penalties for non-compliance must be enforced.
- Remain employed until all rehabilitation measures as required for implementation due to construction damage, are completed and the site is handed over to Eskom by the contractor.
- Any conservation authority/institution as listed in the List of Interested and Affected Parties for the project should be allowed reasonable access to the construction site on request and arrangement with the ECO and the contractor.

# **Environmental Training and Awareness**

The purpose of the environmental training is to communicate potential environmental impacts relating to construction activities to contractors to ensure that precautionary measures are undertaken to avoid and/or mitigate the impacts. Environmental awareness training sessions should be undertaken prior to any work commencing by any contractor or sub-contractor on site as well as throughout the construction phase. The ECO shall give initial EMP training prior to any work starting on site. The training record must be kept on the project file for each training session.

Where possible the presentation will be conducted in the language of the employees. The environmental training could, as a minimum, include the following:

- o The importance of conforming with all environmental policies, procedures, plans and systems;
- o The significant environmental impacts, actual or potential, which could result from their work activities;
- o The environmental benefits of improved personal performance;
- o The roles and responsibilities in achieving conformance with the environmental policy and procedures, including emergency preparedness and response requirements;
- o The potential consequences of departure from specified operating procedures
- o The mitigation measures to be implemented when carrying out their work activities;
- o The importance of not littering;
- o The need to use water sparingly;
- Details of, and encouragement to, minimising the production of waste and re-use, recover and recycle waste where possible;
- o Details regarding palaeontological, archaeological and historical sites which may be unearthed during construction, and the procedures to be followed should these be encountered;
- o The procedures which should be followed should a grave or any other archaeological and/or palaeontological finds be encountered or unearthed during the construction phase:
- o Details regarding flora and fauna of special concern, including protected/endangered plant and animal species, and the procedures to be followed should these be encountered during construction.

# EMP training and awareness before commencement of construction

- Eskom will provide an Environmental Management Plan and Awareness Training for all employees of the Contractor, sub-contractor, consultants, agents, visitors and suppliers. The initial training workshop will be held prior to any work commencing on site. The Contractors shall ensure that all construction personnel, including senior route staff, sub-contractors and suppliers etc., attend the environmental awareness-training prior to commencing any work i.e. camp establishment, clearing and installations. Additional staff, sub-contractors and suppliers coming on to the route must attend an environmental awareness workshop prior to the commencing their duties. Subsequent training and awareness sessions will be arranged at a mutually agreed time and venue.
- The main contractor must provide the ECO with (a) a list of all sub-contractors and their scope of work for the contract and (b) a time schedule of works before the initial environmental training awareness session is scheduled. This will assist the ECO to schedule subsequent EMP awareness training sessions as and when required.
- No construction work may take place on site unless under the supervision of a person who has attended an Environmental Awareness session.
- The PC shall inform the environmental practitioner prior to starting construction, so that training can be given.

# EMP awareness training throughout the construction phase

- EMP awareness training must be given to new contractors and sub-contractors that start to work on site throughout the construction phase at various stages.
- All contractor and sub-contractor teams involved in work on site must be briefed on their obligations
  towards environmental controls and methodologies in terms of this EMP prior to commencement of any
  construction and construction related activities on an on-going basis throughout the construction phase.
- In the case of new workers coming on site throughout the construction programme, the site contractor is responsible to ensure all new labour arriving on site is made aware of the contents of the EMP and is briefed on the Environmental Awareness Training session.
- A register must be kept of all training given to contractors and sub-contractors, indicating the date, time, venue, attendees, name of trainer, name of contractor, signatures and unique numbers / identity numbers of attendees.
- If the construction is phased and the activities are different, a training session must be conducted before the commencement of each phase. The environmental issues, construction impacts and mitigation measures for each phase must be discussed in detail at this training session.

# **Emergency Management**

All emergency incidents should be investigated in terms of Eskom's EPC 32-95: Safety, Health & Environmental Incident Management Procedure, in addition to any ELC requirement. This procedure describes the high-level intention for the effective incident management of work-related incidents as well as environmental damage. The aim of this procedure is to ensure and facilitate the effective and efficient management of incidents from the moment that one occurs, until it can be audited that corrective and preventive measures were developed and taken. This procedure is supported by annexes which set out the detailed rules, requirements and action steps as well as useful examples and templates. These two have to be read and applied together to ensure that the aim of this procedure and its supporting annexes is met.

An **Emergency Incident** can be defined as an unexpected sudden occurrence, including a major emission, fire or explosion leading to serious danger to the public or potentially serious pollution of or detriment to the environment, whether immediate or delayed. It is also an accident involving the spilling of a harmful substance that finds or may find its way into a water resource.

An Environmental Incident can be defined as pollution, erosion, cutting of protected and/or indigenous trees, hazardous substance spillages, wildlife interactions, public complaints and loss of biodiversity caused by Eskom Distribution's activities, as well as non-compliance to legislation such as Environmental Authorisations, Record of Decisions, permits and licences.

# Incident Management – Aims and objectives

The aims and objectives of incident management are as follows:

- o Reduce risk and prevent any recurrence of incidents
- o Ensure incidents are managed effectively
- o Ensure incidents are classified and recorded accurately
- o Ensure prompt and appropriate investigation
- Promote the proactive use and value of near-miss occurrence reporting
- Improve the quality of safety and the work environment by learning from incidents, including near miss occurrences;
- Share incident information with all site personnel and other subcontractors.
- Report to relevant authorities as appropriate
- o Promote the analysis of trends and review practices accordingly

# **Incident Reporting**

After becoming aware of an incident, the following should be done as per Eskom's ELC procedure:

- O All incidents must be reported via flash report within 24 hours or end of shift, regardless of the severity of the incident. Once an employee identifies that an incident has occurred, he/she must immediately notify his/her supervisor of such an incident, regardless of its severity, so that an appropriate and timely response can be made, an initial evaluation conducted, and an incident classification made.
- The responsible supervisor shall then send a flash report to the ECO and Project Coordinator within 24 hours of the incident. Thereafter, it will be determined by the ECO if reporting to the authorities is required.
- o Immediate clean-up action is required;
- Eskom then has 14 days to formally investigate the incident internally before sending a report to the applicable authorities.

# Hazardous Waste - Incident Reporting

If a leakage or spillage of hazardous substances occurs as a result of Eskom's activities or other users, the local emergency services will be immediately notified of the incident. The location, nature of the load and the status of the site of the accident itself (i.e. whether further leakage is still taking place, whether the vehicle or the load is on fire, etc.) must be provided.

Written records of the corrective and remedial measures decided upon, and the progress achieved therewith over time, must be kept. Such progress reporting will be important for monitoring and auditing purposes. The written reports may be used for training purposes in an effort to prevent similar future occurrences.

# **Emergency Preparedness**

Eskom's environmental emergency procedures ensure that there will be an appropriate response to unexpected or accidental actions or incidents that will cause environmental impacts, throughout the life cycle of the project. Such incidents may include, inter alia:

- Accidental discharges to water and land;
- Accidental exposure of employees to hazardous substances;
- Accidental veld fires:
- Accidental spillage of hazardous substances;
- Specific environmental and ecosystem effects from accidental releases or incidents

# The Emergency Preparedness Plan

- o Construction employees shall be adequately trained in terms of incidents and emergency situations.
- o An emergency preparedness plan will include details of the organisation (manpower) and responsibilities, accountability and liability of personnel.
- o The emergency preparedness plan shall include a list of key personnel.
- o Details of emergency services (e.g. the fire department, spill clean-up services, etc.) shall be listed.
- o Internal and external communication plans, including prescribed reporting procedures shall be listed.
- o Actions to be taken in the event of different types of emergencies shall be included.
- o Training plans, testing exercises, and schedules for effectiveness shall be included.
- Eskom will comply with the emergency preparedness, and incident and accident-reporting requirements, as required by the Occupational Health and Safety Act, 1993 (Act No 85 of 1993), the National Environmental Management Act, 1998 (Act No 107 of 1998), the National Water Act, 1008 (Act No 36 of 1998) and the National Veld and Forest Fire Act, 1998 (Act No 101 of 1998) as amended, and/or any other relevant legislation.
- Hazardous material
  - Information on hazardous materials, including the potential impact associated with each, and measure to be taken in the event of accidental release shall be listed.

# **Spillages**

- Streams, rivers, underground water and dams will be protected from direct or indirect spillage of pollutants such as refuse, garbage, cement, concrete, sewage, chemicals, fuels, oils, aggregate, wash water, organic materials and bituminous products.
- o In the event of a spillage during the construction phase, the responsibility for spill treatment will be with Eskom and Eskom will be liable to arrange for competent assistance to clear the affected area.
- Eskom will compile and maintain environmental emergency procedure, to ensure that there will be an appropriate rapid response to unexpected or accidental environmental related incidents throughout the life cycle of the project.
- o Incidents must be reported in line with OU Oil Spill Management Instruction and the Eskom's Incident Management Procedure. The incident must be reported within 24 hours via a flash report.
- The Environmental Control Officer (ECO) will assess the situation and act as required in all cases; the immediate response will be to contain the spill. The exact treatment of soil/water pollution will be determined by the ECO.
- Should water downstream of the spill be polluted, and fauna and flora show signs of deterioration or death, specialist hydrological or ecological advice must be sought for appropriate treatment and remedial procedures to be followed. The costs of containment and rehabilitation will be for Eskom's account, including the costs of specialist input.
- Hazardous substance spillages
  - Hazardous substance spillages can be defined as any hazardous liquids or substances spilt that have the potential to pollute aquatic or terrestrial ecosystems or present a health hazard to other living organisms.
  - The Eskom construction team shall have an oil spill kit on site and where working with hazardous substances, also drip trays on trucks.
  - Vegetated areas cleared of hazardous waste will be re-vegetated.

# During an emergency situation, the following will apply

- o No person shall be allowed to approach a spill, fire, etc. unless he/she is equipped with the personal protective clothing and equipment.
- o The risk involved shall be assessed before anyone approaches the scene of the incident with the emergency response plan as per Oil Spill Management Instruction and Environmental Emergency Preparedness Procedure.
- Any known or discovered spillage of toxic substances into a stream or river should be followed by immediate monitoring of the receiving streams and rivers.

#### Fires

- o The adjacent landowners will be informed and/or involved in case of any fire that poses a threat to landowners.
- o It must be ensured that the basic firefighting equipment is supplied to all living quarters, site offices, kitchen areas, workshop areas and stores.
- o Welding gas cutting or cutting of metal will only be allowed inside the working/demarcated areas and with appropriate firefighting equipment at hand.

# Monitoring

Monitoring will be undertaken as and when required. Any incidents that might have a detrimental impact on the environment will be investigated and environmental monitoring will be conducted. Complaints received will be checked through verifiable monitoring.

# Inspections

On-going visual inspections will be conducted by the ECO. The ECO will spend time on site on the lookout for any unsafe acts and activities that transgress the requirements as specified in the EMP to define what action shall be taken to rectify the problem and prevent its reoccurrence. The Site Environmental Manager will be permanently on site during construction.

#### Written instructions

Written reporting will be given following an audit. The written instructions will indicate the source or sources of the problems identified on site and propose solutions to those problems. The implementation to solutions will be assessed in a follow-up audit and further written instructions issued if required. Maximum allowable response time is 4 working days unless specified otherwise by the ECO.

#### Liaison

Eskom will comply with the requirements for public consultation as required by the National Environmental Management Act, 1009 (Act No 107 of 1998).

Throughout the project, ongoing liaison will be maintained with authorities and communities when needed to ensure that the following is done;

- Timeous advanced warning of any project activities that may have some impact on the surrounding communities i.e. blasting;
- o Ongoing feedback on the environmental performance of the project;
- A complaints' register needs to be opened and maintained by the ECO. The register will contain the contact details of the person who made complaints and information regarding the complaint itself, including the date of submission.

### **Checking and Corrective Action**

Non-compliance with the specifications of the EMP constitutes a Breach of Contract for which Eskom must be immediately notified accordingly. Eskom will be deemed not to have complied with the EMP if;

- There is evidence of contravention of the EMP specifications within the boundaries of the construction site, site extensions and access roads;
- There is contravention of the EMP specifications which relate to activities outside the boundaries of the construction sites;
- o Environmental damage ensues due to negligence;
- o Construction activities take place outside the defined boundaries of the site;
- o Eskom fails to comply with corrective or other instruction.

Non-compliance will be dealt with in terms of the contract documentations signed by the various parties.

The approved Eskom penalty fee structure is as follows:

Non – compliance	Penalty for non- compliance	
PRE-CONSTRUCTION		
Failure to demarcate Construction area/working areas off before construction starts.  Failure to maintain demarcated area(s) throughout the construction phase	R10 000-R15 000	
Failure to demarcate stock piling area of building materials	R1 000	
Fencing off the construction site with mesh fencing of 1.8m, where necessary or other suitable material as agreed on by ECO and contract specifications	R5 000	
Sitting of access road/s to be approved by ECO & demarcated with stakes before any construction starts (if applicable)	R5 000	
Temporary route used for construction must be determined on site with ECO (if applicable)	R1 000 - R5 000	
Sensitive features that may be harmed/removed/harvested must be clearly marked or demarcated and all construction team must be made aware of this.	R2 500 - R5 000	
Failure to give environmental awareness to Construction team and all sub- contractors of all environmental aspects that could lead to imposition of environmental penalties/fines and keep the proof on file.  All appointed contractors must attend Environmental Training contractor to assure that all subcontractors be informed and signed DOU	- R5 000 - R10 000	
Method statements must be provided on request by the ECO. No work may commence until the Method Statement is accepted by the ECO/Project Coordinator and Clerk of Works and contractor representative.	R2 500 - R5 000	
CONSTRUCTION  Failure to keep a copy of the EMP & Environmental Authorisation/Record of		
Decision (ROD) with all the conditions of approval and the relevant Method Statements must be kept on at site at all times.	R500 - R5 000	
Construction team behaviour  Construction team may not overnight on site.		
All noise and sound generated during all phases of the projects must comply with the relevant SANS codes and standards.	R200 - R2 500	
Eating of meals only allowed in demarcated area  No pets permitted on site		
Construction crew must stay within the demarcated construction area. (Applicable in sensitive sites)	R5 000 - R10 000	
Failure to park all construction vehicle on the demarcated area and provision of any oil leaks must be made for example Drip trays	R1 000 - R5 000	
Driving, parking and storing of machinery vehicles are only allowed inside demarcated areas and existing roads.		
Machinery may only be used on the road and may not disturb the vegetation on the sides of the road except if cleared by ECO. Machinery used must be carefully considered to limit environmental damage		
Failure to conduct bush clearing according to Eskom procedure for vegetation clearance and maintenance within the Overhead Powerline Servitude and on Eskom owned land (refer to EPC 32-247)	R5 000 - R10 000	
Failure to undertake herbicide spraying under the supervision of registered Pest Control Officer.	R5 000 - R10 000	
Excavations		

No topsoil may be removed or altered outside the demarcated area and/or which		
was not specified. Storage of topsoil outside dermarcated area to obtain permission	R5 000 - R10 000	
from the landowner.		
Toilets		
Failure to put ablution facilities on site for the construction worker during the	R2 500 - R5 000	
construction phase. These facilities must be used by the construction workers and		
be removed when the project is completed.		
Failure serviced the toilets regularly, (according to the manufacturer's instructions)	R1 000	
and kept clean.	111 000	
Fire Prevention	T	
Failure to keep fire equipment on site at all times	R500 - R4 000	
Failure to keep firefighting equipment to be in good working order and serviced.	R500 - R2 500	
Keeping of open fire on site, this pose a risk of fire.	R1 000 - R5 000	
Dust pollution control		
Failure to suppress dust through regular water spraying the emitted during the	R500 - R5 000	
construction phase (Site specific/weather Dependent)	K300 - K3 000	
Water run-off		
No contamination of water bodies, rivers, dams or wetlands is permitted	R5 000 - R15 000	
Failure to take special care where the powerline will cross river, streams or	R2 500 - R10 000	
wetlands.		
Waste Management		
Failure to provide dust bins/skip on site in order to handle all waste litter	R500 - R5 000	
generated during construction phase of the project.		
General litter / building refuse must be cleaned up on a regular basis from the site	R300 - R5 000	
Cement-contaminated water, paint, oil, cement slurries, etc. must be stored in watertight containers or as agreed with ECO	R500 - R5 000	
Failure to report oil spillage to ECO via flash report within 24 hours of the spill occurring	R2 500 - R5 000	
Any cement / concrete spillage to be cleaned up immediately.		
Ready-mix delivery trucks must not carry out the wash down of their trucks on or	R500 - R5 000	
around the site unless arranged with ECO.	1K300 - K3 000	
Waste must be disposed of at an official waste deposit site on a regular basis.		
Keep the proof on file, waste manifest.	R5 000 - R10 000	
The absence of or inadequate drip trays or binding facilities for on site oil leakage		
Failure to clean up oil/fuel leaks from on-site machinery	R200 - R5 000	
Failure to keep oil spill remediation chemicals on site.		
Soil erosion		
Failure to prevent degradation and soil erosion on the construction site.	R500 - R5 000	
Failure to notify property owners of the construction before commencement and	1300 - 13 000	
obtain the permission in writing and keep on file.	R2 500 - R5 000	
Rehabilitation	T	
Failure to remove rocks and stones/stock pile in area recommended by ECO	R500 - R5 000	
Failure to remove all old concrete and alien materials from site	R500 - R5 000	
Failure to clear all waste and building material on site before commissioning of the project	R500 - R5 000	
General		
Failure to comply with the Environmental Conditions of the approved	DE 000 D00 000	
Environmental Authorisation	R5 000 - R20 000	

#### **DESIGN AND PRE-CONSTRUCTION PHASE**

#### **ENVIRONMENTAL SUPERVISION**

Eskom Distribution, specifically the Environmental Control Officer (ECO), Clerk of Works (CoW) and Project Coordinator (PC) must inspect the construction site on a regular basis (during pre-construction, construction and post-construction periods) to confirm the current state of the site and to ensure that the mitigation and rehabilitation measures are applied as specified in the EMP. The Site Environmental Manager to be permanently on site during construction. These officers might make reasonable amendments to the EMP in co-operation with the contractor.

#### ON-SITE COMMUNICATION PROCEDURE

# On site start-up / kick-off meeting

- The mandatory on-site start-up meeting that is conducted preferably 14 days but not less than 5 working
  days prior to commencement of any site/camp establishment, earthworks and/or construction activities
  and will relate to additional discussed information that must be complied with during the entire construction
  phase.
- All site-specific issues and arrangements as discussed and agreed on at the site start-up meeting.
- Information pertaining to specific site construction agreements that was discussed at the kick-off meeting on site by all the relevant parties and agreed on and must be recorded and included as part of the EMP.
- Any changes made to the EMP as per the agreements between all parties on site must still fall within the conditions of the Environmental Authorisation.
- At the site start-up meeting, the following issues must be discussed:
  - o The Construction EMP & other relevant site documents
  - Project to be discussed and all uncertainties are cleared
  - Method statement/s to be discussed
  - Access routes
  - Road and construction area to be demarcated
  - o Materials stockpile and lay down areas to be demarcated
  - Method of stockpiling to be discussed
  - o Firefighting procedures
  - Mandatory firefighting equipment & fire preventative measures
  - Mandatory site equipment and facilities
  - Solid waste facilities and removal intentions
  - Placement, type and service of toilets to be agreed on
  - o Placement and type of rubbish bins and removal of rubbish to be agreed on
  - Environmental Education and awareness training session to all contractors & onsite staff/labour.
  - o Location & establishment of concrete batching plant facility.

# Monthly construction progress meetings

- Environmental matters pertaining to the construction of the project must be included as an agenda item on the monthly project construction progress meeting.
- The ECO must be invited to monthly construction progress meetings to discuss findings of site audits, mitigation measures and other issues arising pertaining to the implementation of the EMP conditions.

# Minutes of meetings

- Environmental issues, action items, complaints, incidents and mitigation measures must be recorded in minutes of monthly construction project meetings.
- The ECO must be included in the circulation of minutes of meetings in order to stay informed of construction progress and construction issues as they relate to the receiving environment.

#### **DESIGN**

- The engineering drawings must adhere to any site-specific mitigation measures (if applicable) supplied by a geotechnical engineer for the project in order to accommodate the geotechnical and earth-scientific constraints in terms of founding and construction methods, construction materials, excavation, etc.
- A surface runoff management plan indicating the management of all surface runoff generated as a result
  of the development (during construction and operation) must be compiled. It should indicate how water
  velocities will be reduced before stormwater enters natural channels and how natural processes for water
  infiltration of the affected landscape will be accommodated. This study is to be commissioned by Eskom
  Engineering or done by an external Engineer, and to be included in the design specification's Terms of
  Reference.
- The design should incorporate storm water management during and post construction.

# SITE REQUIREMENTS

Eskom representatives must liaise personally with the affected landowner prior to any construction activities taking place. The contact details of the landowner are as follows:

- Portion 38 of the Farm Rondeheuwel 25, Paarl Mr J H Smuts, Rooihoogte Trust
- o P O Box 113 Riebeek Kasteel, 7307
- o 022 448 1982 / 083 655 3597

The objectives of this liaison will be the following:

- To identify the most effective time schedule for construction activities to take place on the applicable property;
- To confirm access routes and Eskom gate localities which is required for both the construction as well as
  operational phases of the project;
- To identify and confirm any site-specific requirements since none was specified during the Basic Assessment process.
- To confirm the contact details of the contractor and Eskom representatives with the landowner to ensure effective communication during the construction and operational phases of the project.
- To determine measures to ensure that farming activities (if required) can continue under the powerline.

Construction workers should wear clearly identifiable clothing that allows for easy recognition of contract workers on private property.

A copy of this EMP must be submitted to landowner / adjacent landowners should they request it. They can assist Eskom in assuring that the contractor adheres to rules as stipulated and that mitigation measures are applied.

#### **FAUNA**

Even though very limited / no impact is foreseen on the fauna of the area, the following general recommendations should be taken into account during the planning phase of the project. Effective planning is always important to ensure protection of fauna (however limited it may be) on site during the construction phase.

- Close site supervision must be maintained during construction.
- Workers must be limited to areas under construction within the servitude and access to adjacent areas should be prohibited.
- All temporary stockpile areas including litter and dumped material and rubble must be removed on completion of construction.
- Firearms or any other hunting weapons must be prohibited on site.
- Contract employees must be educated about the value of wild animals and the importance of their conservation.
- Educational programmes for the contractor's staff must be implemented to ensure that project workers are alerted to the possibility of snakes being found on site.
- Severe contractual fines must be imposed and immediate dismissal on any contract employee who is found attempting to snare or otherwise harm remaining faunal species.
- No animals should be intentionally killed or destroyed and poaching and hunting should not be permitted on the site.

#### **FLORA**

Even though very limited / no impact is foreseen on the flora of the area, the following general recommendations should be taken into account during the planning phase of the project. Effective planning is always important to ensure protection of fauna (however limited it may be) on site during the construction phase.

- Provision of adequate toilet facilities must be implemented to prevent the possible contamination of ground (borehole) water in the area.
- All temporary stockpile areas including litter and dumped material and rubble must be removed on completion of construction.
- All alien invasive plant should be removed from the site to prevent further invasion.
- All vegetation not interfering with the operation of the line shall be left undisturbed.
- Collection of firewood and traditional medicinal plants is strictly prohibited.
- No open fires shall be allowed on site under any circumstance. The Contractor shall have fire-fighting equipment available on all vehicles working on site.
- Disturbed areas must be rehabilitated immediately to prevent soil erosion as well as alien invasive vegetation invasion. The use of herbicides shall only be allowed after a proper investigation into the necessity thereof. Eskom's approval for the use of herbicides is mandatory. Application shall be under the direct supervision of a qualified technician. All surplus herbicide shall be disposed of in accordance with the supplier's specifications. All alien vegetation in the total servitude and densifiers creating a fire hazard shall be cleared and treated with herbicides.

# CULTURAL / HERITAGE RESOURCES & PALAEONTOLOGY

No sites of heritage resources have been identified or are likely to be found within the proposed development area. However, should any heritage resources, including evidence of graves and human burials, archaeological material and paleontological material be discovered during the execution of the activities, all works must be stopped immediately and Heritage Western Cape must be notified without delay.

#### COMPLIANCE WITH SPECIFICALLY IDENTIFIED LEGAL REQUIREMENTS

# The National Water Act (Act No 36 of 1998)

A water use authorisation is not required for this project.

National Forest Act (Act 122 of 1984) and/or the Nature Conservation Ordinance of 1974 (Ordinance 19 of 1974) and / or the Nature Conservation Regulations 955 of 1975

# Protected Fauna Species / Permits

The Department of Agriculture, Fisheries and Forestry (Forestry Branch) developed a list of protected tree species. In terms of Section 15(1) of the National Forests Act, 1998, no person may cut, disturb, damage or destroy any protected tree or possess, collect, remove, transport, export, purchase, sell, donate or in any other manner acquire or dispose of any protected tree or any forest product derived from a protected tree, except under a license or exemption granted by the Minister to an applicant and subject to such period and conditions as may be stipulated.

There are however no protected tree species on site.

#### **CONSTRUCTION SITE**

- Accommodation for labourers must either be limited to guarding personnel on the construction site (with labourers transported daily to and from the site) or a separate fenced and controlled area where proper accommodation and relevant ablution and washing facilities are provided.
- The location of the construction site must be negotiated with the landowner and specifications of the landowner must be adhered to.
- The construction site office and storage areas for material and equipment must be fenced in to prevent impacts and human interference to spread further than the site.
- Storage facilities for construction equipment must be provided for.
- Encourage the construction contractor to employ local people as far as is reasonably practical and encourage the contractor to transport them daily to and from the site. This would reduce solid and liquid waste production and water demand at the site camps.
- Contractors should develop a comprehensive site camp management plan. This should apply even in the case of the limited accommodation camps as discussed above.
- Plan site campsite an appropriate distance from any facility where it can cause a nuisance and could cause a safety hazard.
- Minimise on-site storage of petroleum products.
- Ensure proper maintenance procedures in place for vehicles and equipment.
- Servicing of vehicles to be in designated areas with appropriate spill management procedures in place.
- Ensure measures to contain spills readily available on site (spill kits).
- Sufficient ablution and proper cooking facilities must be provided at the site camp.
- Deposit solid domestic waste in containers and dispose at municipal waste disposal sites regularly.
- Dispose of liquid waste (grey water) with sewerage.
- Install appropriate facilities at the campsite. Preferably utilise municipal systems (conservancy tanks with periodic removal) or chemical toilets.
- Ensure compliance with stringent daily clean up requirements of site camp inert waste (waste concrete, reinforcing rods, waste bags, wire, timber etc) and dispose at municipal waste disposal sites.

### FIRE MANAGEMENT

The following are applicable to both the construction and operational phases:

- No fires may be made for the burning of vegetation and waste, neither as source of heat or cooking.
- No open fires are to be made on site cooking facilities must be provided, particularly for security staff.
- Branches and other debris resulting from pruning processes should not be left in areas where it will pose a
  risk to infrastructure.
- Fires shall not be made for the purpose of chasing or disturbing any fauna.
- The adjacent landowners must be informed and/or involved in case of any fire that may pose a threat to their properties.
- It must be ensured that the basic firefighting equipment is supplied to all living quarters, site offices, kitchen areas, workshop areas and stores and be kept available during construction phase.
- Welding gas cutting or cutting of metal will only be allowed inside the working/demarcated areas and with appropriate firefighting equipment at hand.

#### APPOINTMENT OF CONTRACTORS

- The EMP will be made binding on all Contractors operating on the site and will be included in contract
  documents of all appointed contractors. Non-compliance with, or any deviation from, the conditions set
  out in this document constitutes a failure in compliance.
- The appointment of contractors with proven track records of sound environmental performance should be given priority.
- The contractor must ensure that he is well aware of the implications of and must ensure compliance with the following legal requirements, guidelines and policies:
  - o All relevant Eskom standards, specifications and procedures to manage the significant aspects with regards to oil management, bush clearing, entrance of private property, etc.
  - o All Sections and Regulations of the National Water Act, 1998(Act 36 of 1998) must be complied with; specifically specifications as described in Section 19 on Pollution and Waste.
  - Environmental Best Practice Guidelines and Specifications, compiled by the Department of Water Affairs
- The contractor must be aware that all waste material generated during and after construction should be disposed of at a permitted landfill site and an agreement letter between the municipality and the contractor regarding the disposal of such waste material should be obtained.

#### CONSTRUCTION PHASE

#### **GROUND AND SURFACE WATER**

- Arrangements with the landowner must be made prior to construction for any water usages or municipal water must be carted in.
- Under no circumstances must surface or groundwater be polluted.
- Adequate oil containment precautions must be taken.
- If a spill from a construction vehicle occurs it must be reported to the Site Environmental Manager / ECO with immediate effect. A bio-remediation contractor must be appointed to rehabilitate large oil spills. Small oil spills must be cleaned immediately with an oil spill kit. Spills must be immediately stopped and a drip tray be used to catch any leaks until the risk can be eliminated and mitigation/ rehabilitation measures applied
- Minimise on-site storage of petroleum products.
- Ensure proper maintenance procedures are in place for vehicles and equipment.
- Servicing of vehicles to be done in designated areas with appropriate spill management procedures in place.
- Ensure that measures to contain spills are readily available on site (spill kits).
- All hazardous substance spills must be reported, recorded and investigated.
- All stormwater runoff must be managed efficiently so as to avoid stormwater damage and erosion to adjacent properties.
- During and after construction, stormwater control measures should be implemented especially around stockpiled soil, excavated areas, trenches etc. to avoid the export of soil into any watercourse.
- Stormwater should not be discharged into the working areas and it should be ensured that stormwater leaving the footprint of the proposed development areas is not contaminated by any substance, whether that substance is solid, liquid, vapour or any combination thereof.
- Stockpiling of construction material and soils should be such that pollution is prevented and that the materials will be retained in a storm event.
- Drinking water and water for ablution facilities must be provided to all construction workers on the construction site.

### **WASTE MANAGEMENT**

#### **General Waste**

- Expected constructed waste (unused steel, conductor cables, cement or concrete) and general waste around the construction site (plastic, tins, paper) may degrade the environment if not disposed in the correct manner.
- Littering or illegal dumping of any waste material is prohibited.
- No waste disposal holes may be made on site.
- Under no circumstances should waste be burnt on site.
- Waste separation should be encouraged for recycling purposes.
- Provision must be made for the collection of all general waste materials. Rubbish bags and bins with lids
  must be provided at various points within the construction corridor and must be emptied on a regular
  hasis
- Deposit solid domestic waste in containers and dispose at registered municipal waste disposal sites regularly.

- For all waste that is disposed of, Eskom shall obtain waste manifests and disposal certificates, which shall be recorded and reported to the ECO on a monthly basis.
- Liquid waste (grey water) must be disposed of with sewerage.

# **Construction Waste**

- Ensure compliance with stringent daily clean up requirements of site camp inert waste (waste concrete, reinforcing rods, waste bags, wire, timber, etc.) and dispose at municipal waste disposal sites.
- Construction waste must be collected and sold for recycling purposes as far as possible.

# Sewage

- Portable ablution facilities must be placed within the construction servitude and must be serviced by registered companies only and on a regular basis. There should be one toilet for every fifteen workers.
- No effluent to be dumped in the veld or any watercourse.
- The use of the open veld for ablution is prohibited.

# **Hazardous Waste**

- Oil contaminated waste (soil, cloths used to clean small spills, spill kits, content of drip trays, etc.) must be disposed of at a facility that is registered as a hazardous landfill facility.
- All hazardous substances at the site must be adequately stored and accurately identified, recorded and labelled. All these hazardous substances should be disposed of at a H:H registered disposal facility.
- Hydrocarbon (oil, diesel, petrol) waste as well as hydrocarbon containing material must be regarded as hazardous waste and separated from general waste.
- Persons who remove hazardous waste must be appropriately qualified and authorised.

# PREPARATION OF SERVITUDE / VEGETATION CLEARANCE

- The procedures for vegetation clearance and maintenance within overhead powerline servitudes and on Eskom owned land, updated September 2009 or latest approved revision thereafter, must be implemented (EPC 32-247).
- Vegetation clearance is often one of the very first activities of construction. Even though very limited
  vegetation clearance will be required for this project, the Project Coordinator shall inform the ECO before
  the vegetation clearance contract is issued. Vegetation clearance is considered commencement of
  construction. Eskom needs to notify the DEA of its intention to commence with construction before
  vegetation clearance can commence.
- Even though most of the proposed powerline servitude has been previously ploughed, it must be noted
  that several Species of Conservation Concern (SCC) have been identified in the road and railway reserves
  close to the project site. It is therefore important that no clearing of vegetation to take place without the
  supervision of the Site Environmental Manager / ECO who must ensure that only invasive alien vegetation
  is removed and that SCC are not accidentally or intentionally removed.
- Unnecessary impacts (such as driving off road) on surrounding natural vegetation / agricultural fields must be avoided.

# **CONTROL OF ALIEN VEGETATION**

- Alien vegetation in servitudes shall be managed in terms of the Regulation GNR.1048 of 25 May 1984 (as amended) issued in terms of the Conservation of Agricultural Resources Act, Act 43 of 1983. In terms of these regulations, Eskom shall "control" i.e. to combat Category 1, 2 and 3 plants to the extent necessary to prevent or to contain the occurrence, establishment, growth, multiplication, propagation, regeneration and spreading such plants within servitude areas or land owned by Eskom.
- The use of herbicides shall be in compliance with the terms and conditions of The Fertilisers, Farm Feeds, Agricultural Remedies and Stock Remedies Act, 1947 (Act 36 of 1947).

#### PROTECTION OF FAUNA AND FLORA

- No animals or birds may be fed, disturbed, hunted or trapped.
- No plant material may be removed if not part of identified vegetation clearance.

#### **SOIL EROSION**

- Access roads and site surfaces must be monitored for deterioration and possible erosion. Pro-active
  measures must be implemented to curb erosion and to rehabilitate eroded areas. All areas susceptible to
  erosion must be installed with temporary and permanent diversion channels and berms to prevent
  concentration of surface water and scouring of slopes and banks, thereby countering soil erosion.
- All cleared areas must be ripped and rehabilitated after construction. The top 200mm layer of topsoil must be removed and stockpiled in heaps not higher than 2m and replaced on the construction areas once the activities have been completed.
- All stormwater runoff must be managed efficiently so as to avoid stormwater damage and erosion.
- Should any new temporary access roads be required, the following should apply in areas which are prone
  to erosion:
  - o Where a cutting is made, subsoil drains should be installed wherever a perched water table occurs within 900m of the formation in all cuttings and below fills in the alluvial zones.
  - It is further critical to manage surface water. Drains should be provided along the top and bottom of all deep cuttings. This is to minimise the flow of surface water and erosion to the exposed cut faces and erosion along the toe of the cuttings.
  - Steep sections of the service road must be supplied of sufficient drainage areas to reduce flow velocity of run-off water.
  - Any eroded sections must be rehabilitated and part of the management plan must include regular inspections of the water run-off areas.
- If any erosion occurs, rehabilitation must immediately be done.

# COMMUNITY ISSUES (SAFETY, SECURITY, NOISE, DUST, ETC.)

- Farm gates and fences must be left in the state it was found.
- Under no circumstances shall access be gained by cutting or "dropping" of fences. All gates shall be left closed and the Eskom servitude gates shall be securely locked at all times.
- Should any damage to property occur it should be reported to the ECO and repaired and to a state prior to the damage to the written satisfaction of the landowner and ECO.
- Removal of agricultural products is prohibited.
- No firewood may be collected.
- No open fires are to be made on private property.
- In order to prevent and/or minimise crime, it is required that all construction workers be supplied with controlled serviced accommodation or be supplied with daily transport to and from the site.
- No wandering on adjacent properties is allowed, unless written consent has been obtained from the relevant landowners.
- All construction workers will be allowed only for specified day light hours. Transport should be made available by the contractor to remove labourers from the site after working hours.
- Secure accommodation facilities must be provided for quarding personnel.
- Supervision of labourers must at all times take place.
- Construction hours will be restricted to specific periods that exclude Sundays and public holidays.
- Sweeping of construction sites, clearing of building rubble and debris and watering of construction sites (storage areas, roads, etc.) must take place on a regular basis.
- All excavated areas must be clearly marked and barrier tape must be placed around them to prevent humans and animals from falling into them.

#### POST-CONSTRUCTION & OPERATIONAL PHASE

# **SOIL EROSION**

- Specifications for topsoil storage and replacement to ensure sufficient soil coverage as soon as possible after construction activities must be implemented.
- All embankments (if any) must be adequately compacted and planted with grass to stop any excessive erosion and scouring of the landscape.
- After construction, all temporary access roads should be rehabilitated.
- The site must be rehabilitated and replanted with suitable, indigenous grass to prevent erosion where necessary.

# CONSTRUCTION SITE CLEARANCE

- After construction all building material, signs of excess concrete, equipment, houses, ablution facilities, building rubble, refuse and litter must be removed and cleaned up from the construction site as well as from the store room by the contractor.
- Items that can be used again should be recycled. Unusable waste steel and aluminium to be managed according to Eskom procedures.
- Once construction is completed, the contractor has to obtain written consent from the relevant landowner that the construction site, construction areas, access routes, etc. are sufficiently and adequately rehabilitated to the landowners' satisfaction.

#### **COMMUNITY ISSUES**

- All complaints received with regards to poor conduct of Eskom personnel, malfunction of or damage to
  Eskom structures, bird killings as a result of electrocutions and/or collisions, etc. will be investigated by
  Eskom in cooperation with all the relevant stakeholders.
- Eskom to manage complaints as per GTX line and or direct Eskom personnel on site or contractor site representative. All complaints will be managed according to Eskom existing measures such as 32 95.
- A list of all names, telephone numbers and addresses of the relevant Eskom employees and contractors must be compiled, regularly updated and must be available in case of emergency.
- No wandering on adjacent properties is allowed, unless written consent has been obtained from the relevant landowners.

#### FIRE RISK MANAGEMENT

- Branches and other debris resulting from pruning processes should not be left below conductors or in areas where it will pose a risk to infrastructure.
- Debris shall not be burnt under any circumstances.
- Fires shall not be made for the purpose of chasing or disturbing any fauna.

# ACCESS AND SERVITUDE MAINTENANCE ROADS

#### General

 Eskom access and maintenance roads may only be used for its intended purpose - the use of these roads for any other purpose is prohibited.

- Drivers must stay within the speed limit in order to ensure the safety of other road users.
- All general SA road safety rules and regulations will apply while driving on Eskom's access and maintenance roads.
- Off-road driving is strictly prohibited.
- Should any road be damaged by Eskom, the applicable landowner should immediately be informed and remedial action should be done as soon as possible.
- Eskom personnel should treat private property with respect at all times, for example gates should be lock after entering and exiting, no fauna or flora may be destroyed, killed or collected, the veld may not be used for ablution facilities and swimming in any natural or manmade water features are prohibited.
- The type of vehicle used should be conducive to the road condition; only 4x4 vehicles will be allowed on 4x4 roads. Where at all possible, 4x4 driving should not take place in wet conditions as this can easily cause additional damage to the road.

# Speed limit

- A maximum speed limit of 40km/h should be adhered to when driving on gravel (i.e. 2 wheel track) roads.
- The driving speed should be appropriate to the road conditions at all times. This could ensure the safety of the driver, other occupants as well as surrounding properties.
- Follow the Eskom speed limit of 60km on gravel roads where applicable. The speed limit should not
  exceed 40km for construction vehicles.

#### **Dust Control**

- Speed limits must be strictly adhered to in order to limit the levels of dust pollution.
- Should any complaints from landowners be received (i.e. dust on crops), Eskom should attend to it
  immediately and appropriate dust control measures should be discussed with the landowners and
  implemented (i.e. speed calming measures).

#### **Erosion**

• Should any signs of erosion be evident along the access and maintenance roads, remedial action should take place as soon as possible.

# Monitoring

- Eskom personnel must be made aware of general acceptable road conditions, especially gravel roads and deviations there from should be reported to Eskom's Environmental Management. Access and maintenance roads must be monitored for deterioration and possible erosion at all times.
- Should any road works / rehabilitation be required, monitoring thereof should take place, especially during the rainy season to ensure the effectiveness thereof.
- Adhere to Farm Access procedure at all times.

### MONITORING PROGRAMMES

- Inspection of the servitude should include monitoring of the servitude line during the Post-Construction and the Operational Phase to detect any potential erosion problems timeously. Mitigatory measures should immediately be identified and implemented by Eskom in cooperation with the landowner.
- Any incidents resulting from Eskom structures and operation that might have a detrimental impact on the
  environment will be investigated and measured and, if applicable, will be identified in close cooperation
  with the affected parties and/or stakeholders and be implemented and monitored accordingly.
- Eskom must at all times follow this EMP for maintenance and operational practices to ensure consistent, effective and safe performance of the infrastructure.