



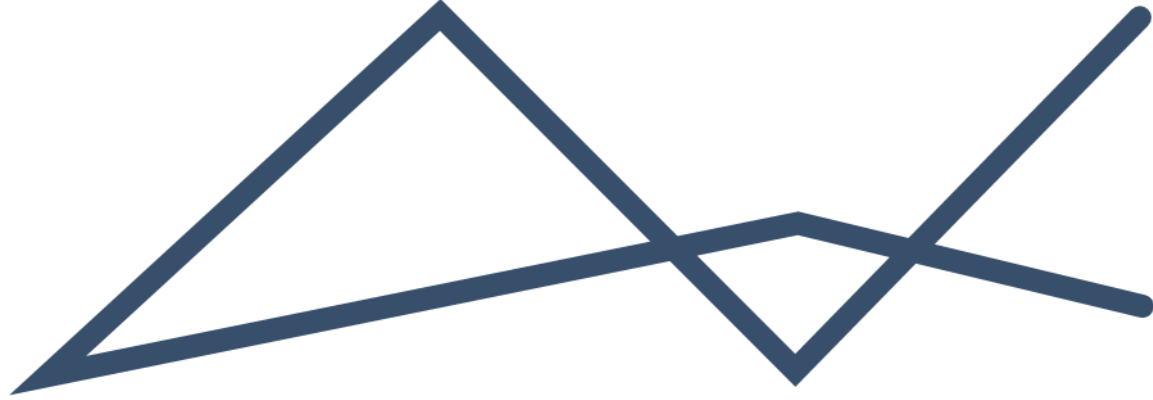
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MONTHLY ECO COMPLIANCE REPORT – JULY 2022

ESKOM WOESTALEEN 132KV CHIKADEE POWERLINE





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List of Abbreviations

Abbreviation	Item
EA	Environmental Authorisation
EIMS	Environmental Impact Management Services (Pty) Ltd
EMPr	Environmental Management Programme
ECO	Environmental Control Officer
GA	General Authorisation
GC	Good Compliance
LILO	Loop in-Loop out
MEW	Major Engineering Works
NC	Non-Compliance
NCR	Non-Compliance Report
PPE	Personal Protective Equipment
WIP	Work in Progress



Definitions

Term	Definition
Non-compliance Report (NCR)	Non-Compliance Reports (NCRs) are issued to the project or relevant contractor if the recorded NCs are not addressed in the agreed timeframes.
Non-compliance (NC)	<p>Instances where a provision of environmental legislation (national, provincial, or local) and/or condition of an environmental approval (for example, environmental authorisation, water use licence, waste licence, licence in terms of the National Forests Act) or any other legal document issued in terms of environmental legislation is contravened.</p> <p>Note 1: Environmental legislation refers to legislation or legal requirements that has/have, or potentially has/have, an impact on activities interacting with the physical environment as defined in NEMA, including, but not limited to, events that result in either air pollution, sterilising the soil, or destroying rare, endangered, or protected fauna or flora (as set out in the NEMA: Biodiversity Act or provincial environmental ordinances) or result in making any water resource unfit for its original purpose, such as domestic, agricultural, or industrial use, or reduce the water quality to such a state that human intervention is required to restore it to its original quality.</p>
Major Non-compliance	Any non-compliance that has the potential to result in a greater consequence than recorded and would include serious/disabling injury, fatality (s), catastrophic failure, major environmental impact/discharge.
Minor Non-compliance	A non-compliance that resulted in its greatest consequence or would require additional factors, that are unlikely, to achieve a more serious outcome.
Incident	Any unplanned event that could, or does, result in harm, damage, and/or environmental pollution or degradation or gives rise to an accident or has the potential to lead to an accident.
Incident management	Incident management is an integral function of risk management and is aimed at reducing the impact of incidents, enabling corrective action to be taken and changed practice to be introduced. It also allows for learning from the incidents that have occurred to prevent similar incidents from happening or to mitigate their impact. This includes the effective communicating, reporting, measurement, recording and investigation of incidents.
NEMA section 30 incident	“Incident” means an unexpected, sudden and uncontrolled release of a hazardous substance, including from a major emission, fire or explosion, that causes, has caused or may cause significant harm to the environment, human life or property.



1 INTRODUCTION

Eskom Holdings SOC Ltd. (Eskom) was granted an Environmental Authorisation (EA) (DEA Ref. no: 14/12/16/3/3/1/1876) for the proposed Woestaleen 132kV Chikadee powerline between the existing Bothashoek/speculate 132kV powerline and the Woestaleen substation within the Steve Tshwete Local Municipality, Mpumalanga Province on the 25th of April 2018. Environmental Impact Management Services (EIMS) (Pty) Ltd was appointed by Eskom to fulfil the role of the ECO for the Woestaleen 132kV Chickadee powerline.

An Eskom department, Major Engineering Works (MEW), has been appointed as the principal contractor to carry out construction works, with Rejcon appointed to undertake bush clearing. Rejcon has completed the bush clearing work. The principal contractor had temporarily halted construction activities during the time of this audit. It is among the conditions of the EA and Environmental Management Programme (EMPr) that an Independent Environmental Control Officer (ECO) is appointed to monitor the project compliance with conditions of the EA/EMPr. The ECO is required to conduct monthly monitoring inspections /audits and compile a monthly report based on the findings of the inspections /audit.

This report provides feedback on the observations made by the ECO on the site inspection conducted on the 21st of July 2022. The project has officially entered the construction phase with the handover meeting undertaken on the 25th of March 2022. Introductions and environmental inductions were undertaken on site during the handover site meeting and subsequently during the bush clearing contractor's mobilisation, environmental induction for MEW were conducted on the 6th June 2022.

2 DETAILS OF THE ECO

The ECO audit was undertaken by Qaphela Magaqa from EIMS on the 21st of July 2022. Mr Magaqa's details are described in the section below.

2.1 EXPERTISE OF THE ECO

Mr. Magaqa holds a BSc. Honours degree in Geographic Information Systems and a BSc degree in Geology and Geography from the Nelson Mandela University. He is an Environmental Consultant with 2 years' experience and 2 years' experience in GIS. His expertise lies mainly in environmental management, waste management, GIS, auditing and reporting. Mr. Magaqa has been involved in the Stutterheim landfill restoration project, where he conducted internal compliance audits. He has also been involved in projects in the waste sector.

2.2 DECLARATION OF INDEPENDENCE

I, Qaphela Magaqa, declare that –

- I act as the independent Environmental Control Officer;*
- I will perform the work relating to the ECO audits in an objective manner, even if this results in views and findings that are not favourable to the Client;*
- I declare that there are no circumstances that may compromise my objectivity in performing such work;*
- I have expertise in conducting environmental audits, including knowledge of the environmental Acts, regulations and any guidelines that have relevance to the audited operations;*
- I will comply with the relevant Acts, regulations and all other applicable legislation;*
- I have no, and will not engage in, conflicting interests in the audit process; and*
- I realise that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 24F of the NEMA.*

I do not have and will not have any vested interest (either business, financial, personal or other) in the audit other than remuneration for work performed.



3 LICENCES AND PERMITS

To date the following Licences and Permits have been issued for the project:

- Environmental Authorisation - DEA Ref. no: 14/12/16/3/3/1/1876 approved by DEA on 25th of April 2018; and
- EMPr for Eskom Woestaleen 132kV Chikadee Powerline Project, Mpumalanga Province – March 2018.

4 SCOPE, PURPOSE AND OBJECTIVE OF THE AUDIT

The scope of the audit is to assess compliance with the conditions of the Eskom Woestaleen 132kV Chikadee Powerline project EA and EMPr, situated approximately 22km south-east of the town of Middelburg within the Steve Tshwete Local Municipality. The purpose of the audit is to ensure compliance with the requirement of the EA and EMPr which requires monthly compliance monitoring during the construction period. The objective of the audit is to determine and monitor the level of compliance of the License Holder with the provisions of the requisite EA and EMPr.

5 AUDIT METHODOLOGY

5.1 PROCEDURE FOR THE AUDIT

A checklist was prepared based on the requirements of the EA and EMPr for the pre-construction, construction, operational and closure phases. Following the initial checklist preparation and documentation review, a site visit was undertaken on the 21st of July 2022 to determine compliance with the EA and EMPr. Compliance with the requirements was evaluated using the pre-determined scoring criteria as described in Section 5.2 and the results of the audit are described in Section 6 of this report.

Various documentation and records were required during the audit to confirm compliance with the requirements. Where possible, documentation and records were made available electronically for review prior to the site visit. The rest of the information required for verification of compliance was provided during the site inspection.

5.2 EVALUATION CRITERIA USED DURING THE AUDIT

The evaluation criteria for compliance scoring was based on a pre-determined scoring system. Each condition of the EA and EMPr was weighted equally in order to determine a compliance score. The scoring criteria used during the audit are as follows:

- **Full-Compliance:** Indicating that the condition was fully complied with and provided with a compliance score of 4.
- **Partial-Compliance:** Indicating that the condition has not been fully complied with and that additional measures are required to obtain full compliance. Partial compliances were provided with a compliance score of 2.
- **Non-Compliance:** Indicating that the condition has not been complied with and provided with a compliance score of 0.
- **Not Applicable (N/A):** Indicating that the condition is not currently applicable. Not applicable conditions were removed from the total number of conditions from which the compliance score was calculated during this reporting period.

6 RESULTS OF THE AUDIT

The results of the monthly ECO Audit are provided in this section of the report. The compliance summary, areas of good compliance, areas of concern and areas of non-compliance are provided in sections 8.1, 8.2 and 8.3 respectively.



6.1 COMPLIANCE SUMMARY

A total of 71 conditions were identified in the EA that were evaluated. 36 of these conditions were considered not applicable to the current audit. Of the applicable conditions a total of 30 were noted to be fully compliant, and 5 were non-compliant.

A total of 235 commitments were identified in the EMPr that were evaluated. 125 of these conditions were considered not applicable to the current audit. Of the applicable conditions a total of 78 commitments were noted to be fully compliant, 8 were partially compliant, and 24 were non-compliant.

The level of compliance for each commitment/condition was calculated according to the methodology described in section 5.2. Utilising this scoring system, **a total straight compliance score of 85.71% was obtained for the EA, and 70.91% for the EMPr.** A summary of compliance for the EA and EMPr are presented Figures 1 and 2 respectively below.

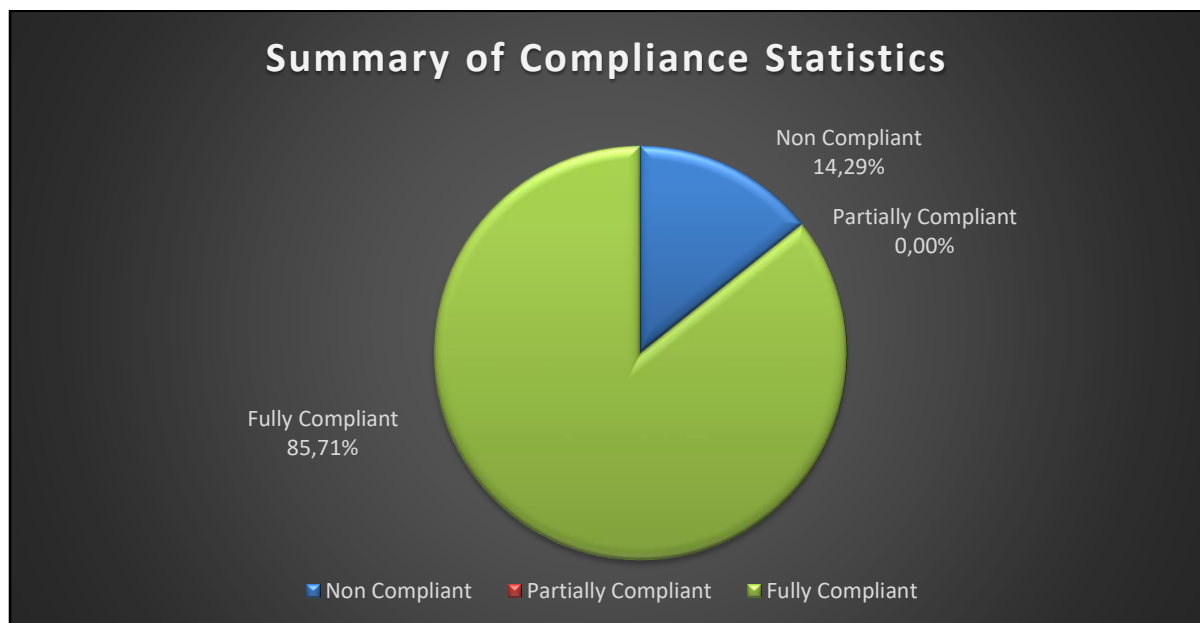


Figure 1: Summary of compliance with the requirements of the EA

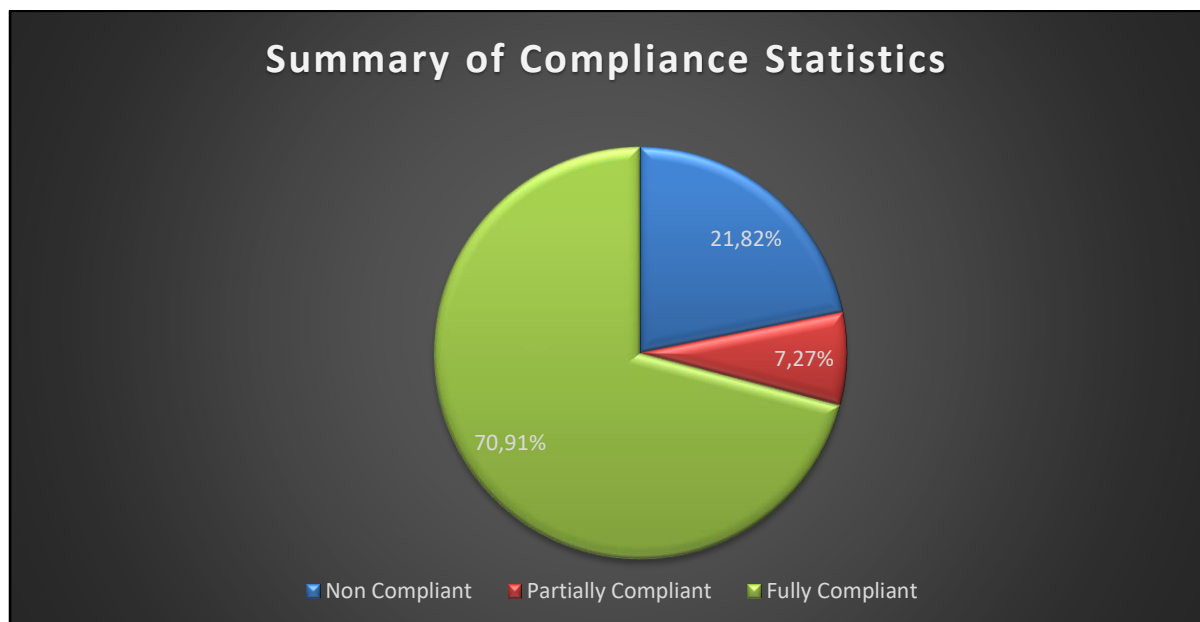


Figure 2: Summary of compliance with the requirements of the EMPr.



7 EXTENT OF ACTIVITIES

A site visit / inspection was undertaken by the ECO on the 21st of July 2022. This report represents the 4th ECO Audit Report for the project. At the time of this audit the main contractor, had completed excavations on site and fitted concrete rings. The permit holder has placed construction activities on site on hold until further notice. The photographic record below depicts activities noted during the monthly site inspection.



Figure 3: Fitted concrete rings into excavations and placement of steel poles.



Figure 4: Removal of site office, security guard post and chemical ablution facilities.



8 OBSERVATIONS

Below is the list of observations that were noted during the current reporting period:

8.1 AREAS OF GOOD COMPLIANCE

No (0) area of good compliance was recorded during this reporting period.


8.2 AREAS OF CONCERN

No (0) areas of concern was recorded during this reporting period.

8.3 NON-COMPLIANCES

One (1) non-compliance was recorded during the reporting period.

Table 1: Table of non-compliances raised during reporting period.

NC No.	Resp. Party	Ref:#	Requirement	Description	Recommendation	Photo Reference
008	Contractor/ Applicant	EMPr 23	Ensure that no litter, refuse, wastes, rubbish, rubble, debris and builders wastes generated on the premises be placed, dumped or deposited on adjacent/surrounding properties during or after the construction period of the project are disposed of an approved at dumping site as approved by the Council.	Cleared vegetation has not been neatly stored on one side of the servitude	The applicant reported that the landowner would make use of the cleared vegetation. It is however recommended that the cleared vegetation be neatly stacked on one side of the servitude as stated in the EMPr.	



8.4 STATUS OF NON-COMPLIANCES REPORTED DURING PREVIOUS REPORTING PERIODS

This section provides the status of the non-compliances that were raised during the previous ECO Audit. The applicant / contractor should provide action plans to update the status of these and non-submission will be regarded as open / uncorrected.


Table 2: Status of non-compliances recorded during previous reporting periods

Status Description		Colour Scale				
Closed-Out/ Corrected						
Work in Progress (WIP)						
Open/ Uncorrected						
Concern #:	EA & EMPr Ref.	Requirement	Description	Recommendation	Status	Photographic Record
20220721						
NC 002	EA 12	The holder of the authorisation must publish a notice informing interested and affected parties where the decision can be accessed; and drawing the attention of interested and affected parties where the decision can be accessed; and 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	Proof that a notice was published informing I&APs of the EA decision was not made available to the ECO during this audit period.	Proof of publishing a notice must be located, submitted to the ECO and a copy kept in the site environmental file.	Open.	N/A



Concern #:	EA & EMPr Ref.	Requirement	Description	Recommendation	Status	Photographic Record
		of the public participation process.				
NC 003	EMPr 33	Within 21 days of the Commencement Date, the Site Contractor shall prepare and submit to the Project Manager for approval in consultation with the ECO an Environmental Protection Plan. The Plan shall cover all environmental protection works and shall also include descriptions of environmental safeguards and emergency procedures.	The 21 day period of commencement of site activity has lapsed and no Environmental Protection Plan has been submitted.	The bush clearing contractor was on site for a short period of time. It was reported by the applicant that the main contractor will develop an Environmental Protection Plan upon occupying site.	Open	N/A
NC 004	EMPr 238	The security fence around the development site must be completed before construction commences internally.	No fencing of the construction area to prevent unauthorised site access.	The applicant reported that it is not feasible to fence the entire construction site as it is not standard practice. They further indicated that an independent security service provider has been contracted to conduct security surveillance on site.	Open	



Concern #:	EA & EMPr Ref.	Requirement	Description	Recommendation	Status	Photographic Record
NC 005	EMPr 23	Topsoil (the upper 25 cm of soil) is an important natural resource; where it must be stripped, never mix it with subsoil or any other material, store and protect it separately until it can be re-applied, minimise handling of topsoil.	Topsoil mixing was noted in soil stockpiles, no separate stockpiling of topsoil.	Topsoil must always be stored separately to promote vegetation regrowth during rehabilitation. This was communicated to the contractor during this audit.	Open	
NC 006	EMPr 45	Contractor shall not commence work on that activity until such time as the Method Statement has been approved in writing by the RE contract.	Construction method statements were not made available at the time of this audit.	The applicant must submit all necessary method statements for the various activities undertaken.	Open	
NC 007	EMPr 223 & 224	Do not allow the movement of public within the development site by posting notices at the entrance gates, and where necessary on the boundary fence. Appropriate notification signs must be erected, warning the residents and visitors about the hazards around the construction	No signage for proper site identification, travel restrictions and speed limit on site.	It is recommended that the contractor posts signage for site identification, indication of speed limits, and travel restrictions at various areas on site.	Open	



Concern #:	EA & EMPr Ref.	Requirement	Description	Recommendation	Status	Photographic Record
		site and presence of heavy vehicles				



8.5 NON-COMPLIANCE REPORTS

Non-Compliance Reports (NCRs) are issued to the project or relevant contractor if the recorded NCs are not addressed in the agreed timeframes. No (0) NCRs were issued during the current reporting period.

8.6 INCIDENTS

No (0) incidents were noted and reported to the ECO during the reporting period. It should be noted that all incidents should be reported to the ECO as soon as they occur.

8.7 COMPLAINTS

No complaints were reported to the ECO during the reporting period. It should be noted that all complaints should be recorded in the site complaints register and reported to the ECO as soon as they occur.

9 CONCLUSION

This is the fourth ECO environmental compliance audit for the project and focused on the requirements of the EA and EMPr. At the time of the compliance monitoring the contractor had fitted concrete rings and construction activities had been placed on hold until further notice. Utilising this scoring system, a total compliance score of **85,71% was obtained for the EA, and 70,91% for the EMPr**. A summary of the number of observations noted is provided in Table 3 below.

Table 3: Summary of observations noted during the reporting period.

Description	Number Raised during Reporting Period	Total Number Raised	Total Number Open/ Uncorrected
Areas of Good Compliance	0	8	N/A
Areas of Concern	0	3	0
Non-compliances	1	8	7
Non-compliance Reports	0	0	0
Incidents	0	0	0
Complaints	0	0	0



10 ASSUMPTIONS AND LIMITATIONS

The following assumptions and limitations apply to this report:

- The information contained in this report was sourced from information and data supplied by third parties that is assumed to be complete, valid, and true.
- This report is based on information available at the time. The information, data, observations, and evidence this report is based on is beyond the control of EIMS and may change without notice. EIMS will not be liable for any loss or damage which may arise directly or indirectly as a result of such changes.
- This audit does not specifically assess compliance with any other permits, licences, or authorisations not included here that may be applicable to the operations.
- No representation or warranty, express or implied, is or will be made in relation to, and no responsibility or liability is or will be accepted by EIMS in relation to the accuracy of this report.
- Where reference is made to legislation or other statutory provisions in this report the original legislation or other statutory provisions will always take precedence and the reader is directed to revert to the original legislation.