

Environmental Management Plan For Construction

Proposed Residentil Development on Erf 1486, Vermont

May 2024

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1. INTRODUCTION

This Environmental Management Plan (EMP) serves as a guideline document for the construction phase of the development of Erf 1486, Vermont, Hermanus.

This EMP describes mitigation measures and is prescriptive, identifying specific individuals or organisations responsible for undertaking specific tasks during the construction phase of the development with the aim to ensure that potential impacts on the environment during the construction phase, are minimised and / or avoided. The EMP is an open-ended document and may require updating from time to time and as the activities evolve on site. The construction EMP has been compiled as part of the Basic Assessment process and once approved by the Competent Authority, is legally binding. This EMP is to be read in conjunction with the Architectural and Landscape Guideline Document, as attached.

This EMP is drafted in line with the requirements outlined in Section 24N of the National Environmental Management Act (NEMA) (Act 107 of 1998).

2. ACTIVITY

Erf 1486 Vermont is located within the residential suburb of Vermont. The erf is one of the last remaining undeveloped residential erven in the area. The erf is just over 1.5 ha in extent. Access is already in place via Lynx Road. The proposal included the development of the subject erf to create 9 new Residential erven, Open Space Zones and 1 Transport Zone. The existing building located along the R43 boundary, will be demolished to make way for the new erven and dwellings.

The main activities expected during the construction phase include:

- Clearance of vegetation for erf and road development limited as far as possible.
- Minor earthworks and installation of foundations
- Demolition of buildings on site
- Delivery of construction materials
- Storage and / or stockpiling of construction materials
- Mixing and preparation of construction materials
- Extension of services to the site

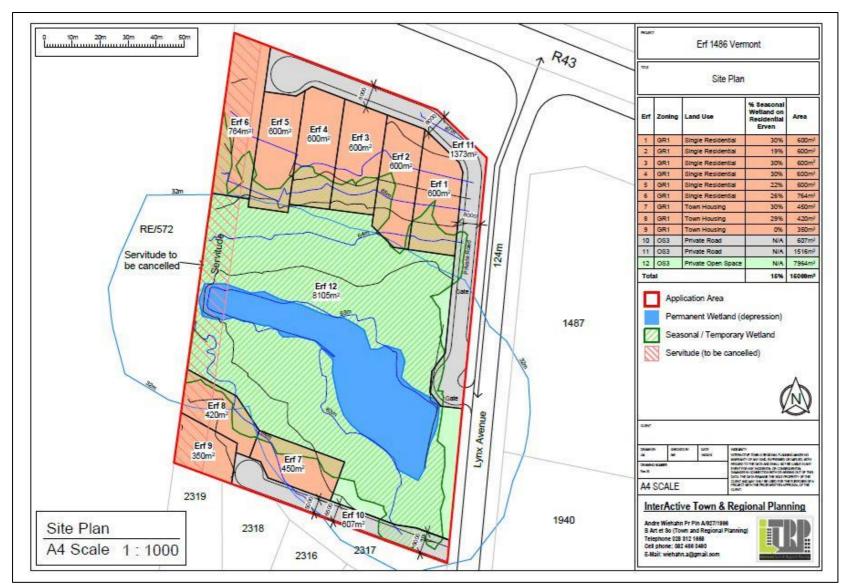


Figure 1. Preferred alternative.

3. KEY TERMS AND ABBREVIATIONS

BAR	Basic Assessment Report
CARA	Conservation of Agricultural Resources Act (Act No. 43 of 1983)
DEA&DP	Department of Environmental Affairs and Development Planning (Western Cape)
EA	Environmental Authorisation
ECA	Environment Conservation Act (Act No. 73 of 1989)
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
EMPr	Environmental Management Programme
NEMA	National Environmental Management Act (Act No. 107 of 1998)
NEM:BA	National Environmental Management Biodiversity Act (Act No. 10 of 2004)
NEM:WA	National Environmental Management Waste Act (Act No. 59 of 2008)
PPE	Personal Protective Equipment
SDS	Safety Data Sheets
SHE	Safety Health and Environmental

Basic Assessment - Process followed to receive Environmental Authorisation from the Competent Authority, necessitated by NEMA. The Basic Assessment Report (BAR) is drafted in line with the legislation.

Competent authority - The Department of Environmental Affairs and Development Planning (DEA&DP)

Contractor - the main or specialised contractors as appointed by the developer / applicant for the execution of the works, including all sub-contractors

Developer / Applicant – Elephant Ventures Africa cc

Environmental Control Officer (ECO) - a suitably qualified person to be appointed by the Developer / Applicant, to oversee the implementation of the EMP and environmental agreement until the completion of works on the site

Environmental Management Plan / Programme (EMP/r) - this document, approved by the competent authority, to control the implementation of the works on the site in such a way as to ensure that they do not result in undue or reasonably adverse impacts on the environment.

General waste - Waste that does not pose an immediate hazard or threat to health or to the environment, and includes domestic waste, building and demolition waste, business waste and inert waste

Hazardous waste - Any waste that contains organic or inorganic elements or compounds that may, owing to the inherent physical, chemical or toxicological characteristics of that waste, have a detrimental impact on health and the environment.

Project manager - Overall responsible and accountable person for the site during the construction, operation and decommissioning of the facility.

Project Management team - The responsibility of the EMP implementation resides with this team. This team includes a Project Manager and appointed contractors and consultants.

Safety, Health and Environmental Officer (SHE Representative) – Applicant / developer will appoint one Safety Health and Environmental Officer, assisting the construction manager on Safety, Health and Environmental aspects of the project on the construction site.

Site Manager – the employee of the main contractor responsible for the day to day control of all activities and operation on site.

Sub-contractor and Contractor - Any provider of services, goods or people to the Applicant / Developer, for the construction, operation or decommissioning.

4. ENVIRONMENTAL CONTROL ON SITE

4.1. Approach

The Table below illustrates the various approaches to be undertaken to manage potential scenarios as a result of the activity on site:

Table 1: Impact management

Avoidance	Avoiding activities that could result in adverse impacts and/or resources or areas considered sensitive.
Prevention	Preventing the occurrence of negative environmental impacts and/or preventing such an occurrence having negative impacts.
Preservation	Preventing any future actions that might adversely affect an environmental resource.
Minimisation	Limiting or reducing the degree, extent, magnitude or duration of adverse impacts through scaling down, relocating, redesigning and/or realigning elements of the project.
Mitigation	Measures taken to minimise adverse impacts on the environment.
Enhancement	Magnifying and/or improving the positive effects or benefits of a project.
Rehabilitation	Repairing affected resources, such as natural habitats or water resources.
Restoration	Restoring affected resources to an earlier (possibly more stable and productive) state, typically, 'background' or 'pristine' condition. These resources may include soils and biodiversity
Compensation	Compensating for lost resources, and where possible, the creation, enhancement or protection of the same type of resource at another suitable and acceptable location.

4.2. Organisational Structure and Responsibilities

The Applicant and their appointed contractors will be responsible for the construction phase of each house, internal and access roads and associated infrastructure. All construction related staff are to be briefed on the

requirements of the EA and EMP and copies of these documents are to be kept on site during all phases of construction.

Environmental Control Officer

Due to the sensitivity of the site, it is recommended that an ECO be appointed for the construction phase of the development. ECO site visits should take place for the duration of the construction phase as per the conditions of the Environmental Authorisation. This will ensure that the additional conditions contained in the EA, EMP and BAR are implemented.

The responsibilities of the ECO during the construction phase of the project, will include, but not be limited to, the following:

- To environmentally educate and raise the awareness of the Contractors and their staff and to target responsible individuals as key players for environmental education and to facilitate the spread of the correct environmental attitude during the contract work
- To review method statements and to determine the most environmentally sensitive options
- To oversee the implementation of environmental procedures set out in this document
- To attend site contractor's meetings, as required and report on environmental issues
- To receive notices and minutes of all site meetings
- To maintain an open and direct channel of communication with the construction team and site manager
- To take immediate action on site where clearly defined no-go areas are violated, or in danger of being violated, and to inform the site manager immediately, of the documents and the action taken
- To keep an up to date record of works on site, as they relate to environmental issues in the site diary.
- To be contactable by the public regarding matters of environmental concern during the construction phase.

Project Manager.

In addition to the ECO, the Project Manager will be responsible for the following:

- All activities relating to the construction phase
- Delegate activities in accordance with the EMP
- Communicate design changes and technical issues to the team timeously
- Ensure that all contractors are managing their team adequately and abiding by the conditions of the EMP and EA
- Ensuring that the Contractors are aware of the conditions of the EMP and EA

Contractor

The Contractor (including sub-contractors) will be responsible for:

- Familiarising themselves with the EIA and EMP
- Complying with the EMP and EA commitments and any other legislative requirements as applicable
- Adhering to any instructions issued by the Project Manager or the Safety, Health and Environmental (SHE) Officer, if applicable
- Submitting an environmental report at designated site meetings on the environmental incidents that have occurred, if applicable
- Arranging that all employees and those of the subcontractors receive appropriate training prior to the commencement of construction, taking cognisance of this EMP and EA

4.3. Site documentation and reporting

Site logbook

A logbook should be kept on a construction site for the purposes of recording on-site instructions and as a general record of environmental issues. The logbook should be kept for a minimum of two years after the activity is completed for the relevant authority to review if deemed necessary. A photographic record of before and after construction should also be kept for visual reference purposes. The logbook should also contain the following sections:

- Environmental Site Instruction

The Environmental Site Instruction section will be used for the recording of general site instructions relating to the protection of environmentally sensitive or potentially impacted areas or features on the site as applicable, by the ECO / site manager / construction team.

- Site Diary

The purpose of this section will be to record the comments of the ECO / site manager / contractor etc., as they relate to activities on the site. The diary should also hold the complaints register, received from onsite personnel and the general public, Environmental Incident Register, disposal certificates for waste and sewage, non-conformance information, and written corrective active instructions.

- Monitoring Section

The purpose of this section will be to record the comments of the ECO / site manager / contractor, during construction, relating to the implementation of the mitigation measures as well as waste, recycling, landscaping and renewable energy measures used during the construction. The findings of all inspections and internal audits should be structured into instructive reporting, providing information to all responsible personnel. Corrective actions must be clearly defined where required. Within the reporting function a structured review component will be enforced. This review function will assist in prescribing necessary corrective actions. During construction, the ECO / Project management team, will be responsible for onsite monitoring to ensure that the contractor abides by the conditions of the EA and EMP.

The Environmental Authorisation (EA) as well as a copy of the approved Environmental Management Plan (EMP) for Construction, should also be accessible on site at all times.

5. ENVIRONMENTAL AWARENESS

It is important to ensure that the contractors and employees associated with the proposed activity receive the appropriate level of training and awareness to ensure that continual environmental due diligence and conservation is applied at all levels of work carried out on site. Employees, contractors and sub-contractors must be made aware of their responsibilities in terms of relevant legislation, guidelines, as well as this EMP and EA.

The environmental conditions should be included in the contracts issued to the contractors, making them aware of the potential environmental impacts and risks associated with the proposed development as well as what measures are expected of them whilst conducting work on site. The importance of implementing the conditions in the EMP and the necessity of good housekeeping practices, will be made known to the contractors and employees.

5.1. Aim of the Environmental Awareness Plan

- Promote environmental education and conservation on site
- Inform employees and contractors on the applicable environmental procedures and plans

5.2. Environmental Awareness Training and content

- All personnel should undergo induction, which as a minimum should include Safety, Health and Environmental awareness
- All attendees should sign an acknowledgement register upon receiving and understanding the induction
- Construction and operational staff should be trained on the implementation of emergency procedures where applicable
- Definitions as used in this EMP should be provided
- How and why environmental protection is necessary, should be explained
- Management measures required to prevent environmental impacts should be outlined
- Emergency and spills response procedures should be outlined

Environmental conditions in the induction should focus on the following:

- Good house-keeping practices
- Air quality (Dust)
- Waste Management
- Odour/vermin Control
- Proper use of sanitation facilities; and
- Chemicals and materials storage, use and handling.

Environmental training should be implemented at the onset of the construction and can be done verbally or in written format. Proof of training should be kept on record.

6. LEGISLATIVE REQUIREMENTS

A Basic Environmental Assessment process was applicable in terms of the National Environmental Management Act (Act No. 107 of 1998) (NEMA) and the Environmental Impact Assessment (EIA) regulations (2014) (as amended). Appendix 4 of the NEMA EIA Regulations (GN. R982) sets out the minimum requirements for the drafting of an Environmental Management Plan (EMP). This EMP has been created in fulfilment of these prescribed requirements for the construction phase of the activity. The implementation of this EMP will be a condition of approval of the Environmental Authorisation (EA). Failure by the applicant, to comply with this EMP, will therefore constitute an offence, and the applicant and / or the appointed contractors can be held liable for penalties and / or legal action. It is therefore important that a copy of this EMP be issued to each contractor, preferably at the appointment stage, in order to allow for the costs of implementing the EMP, to be included in cost proposals. This will also ensure that the contractor is aware of his responsibilities prior to appointment and commencement. Each appointed contractor involved in the project, as well as the project manager (as applicable), will be required to sign for and thereby acknowledge contents of, the approved EMP and therefore abide by the specifications of the document and any amendments thereto.

Other applicable legislation

The Constitution of The Republic of South Africa (Act 108 of 1996)

The Constitution of the Republic of South Africa states that everyone has a right to a non-threatening environment and that reasonable measures are applied to protect the environment. This includes preventing pollution and promoting conservation and environmentally sustainable development, while promoting justifiable social and economic development.

National Environmental Management Act (Act 107 of 1998)

The National Environmental Management Act (NEMA), as amended, makes provision for the identification and assessment of activities that are potentially detrimental to the environment and which require authorisation from the relevant competent authorities. NEMA is a National Act, which is enforced by the Department of Environmental Affairs (DEA). These powers are delegated in the Western Cape to the Department of Environmental Affairs and Development Planning (DEA&DP).

National Environmental Management: Biodiversity Act (Act 10 of 2004)

Chapter 4 of the National Environmental Management: Biodiversity Act, 2004 (NEMBA) deals with threatened and protected ecosystems and species. The need to protect listed ecosystems is addressed (Section 54). Section 73 deals with Duty of Care relating to invasive species, while Section 76(2) calls for development of invasive species monitoring, control and eradication plans by all organs of state in all spheres of government, as part of environmental management plans required in terms of Section 11 of NEMA.

National Environmental Management: Waste Act (Act No. 59 of 2008)

The National Environmental Management: Waste Act (NEM:WA) provides for specific waste management measures (disposal and storage) and the remediation of contaminated land.

National Environmental Management: Air Quality Act (Act No. 39 of 2004)

Section 32 provides provision for the control of dust, section 34 provides provision for the control of noise and section 35 provides provision for the control of offensive odours, all which may be experienced during the construction or operation of an applicable development.

Environment Conservation Act (Act No. 73 of 1989)

The Environment Conservation Act (ECA) provides provision for the prevention of littering by employees and subcontractors during construction and the maintenance phases of development.

Occupational Health and Safety Act (Act No. 85 of 1993)

Section 8 outlines the general duties of employers to their employees and section 9 outlines the general duties of employers and self-employed persons, to persons other than their employees.

Hazardous Substances Act (Act No. 5 of 1973)

This Act provides for the definition, classification, use, operation, modification, disposal or dumping of hazardous substances.

7. CONSTRUCTION PHASE IMPACTS AND MITIGATIONS

7.1. Wetland

The proposed development has been greatly influenced by the presence of watercourses and wetlands on the property. A thorough Aquatic Biodiversity Impact assessment study meticulously considered the sensitive habitat on-site to minimize potential impacts from development. It is important to note that the wetland within the site does not contain peat as indicated in the specialist report. However, its small size and degraded condition suggest it would not significantly contribute to climate resilience, nor will construction within it release notable carbon into the atmosphere.

The site development plan has undergone various amendments to accommodate environmental constraints, ultimately resulting in the preferred Layout (Alternative 4). A wetland delineation was undertaken to inform alternative 3. In response to comments received during the first round of public participation, a full Freshwater Impact Assessment and Botanical Impact Assessment were undertaken. These reports identified sensitive areas on site which should be removed from the development areas and provided mitigation measures to address impacts and concerns. This proposed allow for the evolution of the new preferred alternative, Alternative 4.

The following recommendations were made by the Freshwater specialist:

- Although the condition of the UVB wetland was largely disturbed, the moderate to moderately high EIS and WES scores indicates that the wetland is moderately sensitive and important in terms of conservation planning or provision of ecosystem services. The wetland rehabilitation plan will be included.
- It is recommended that the proposed residential areas are positioned within the proposed new Erven so as to avoid the delineated wetland area. Should the proposed residential developments avoid the wetland area entirely, the impact of Wetland Loss, as assessed in this report, will not be applicable.
- The proposed layout has gone through various iterations in order to ensure that the layout overlapping with the delineated wetland area is minimal. Ordinarily, wetland loss would fall within the 'high' category, but the limited area of wetland loss (0,22 Ha) and the degraded nature of the wetland has reduced the impact significance. The new layout Alternative 4 was informed by the specialist input.
- Although it is unknown whether the development area would be further developed in future, it is
 assumed that the site would remain as is. The No-Go option would result in the continuation of impact
 to the wetland due to adjacent land uses and would therefore still result in negative impact to the
 wetland onsite.

7.1.1 Wetland Rehabilitation and Management Plan

A suitable rehabilitation and management plan will be drafted for the wetland on site.

7.2. Indigenous vegetation

The site is characterised by critically endangered Hangklip Sand Fynbos vegetation and has been identified to fall within he ESA2, based on the BSP these areas play an important role in supporting the functioning of PAs or CBAs and are often vital for delivering ecosystem services. As little indigenous vegetation as possible, should be

removed and impacted during the construction phase. In order to achieve this, the footprints of each dwelling should be clearly indicated, and a zone of works should be laid out on the site in an attempt to conserve as much of the remaining vegetation of site as possible. Predetermined access to each erf should be used and the rest should be marked as No-Go areas. Construction teams should only be permitted to access the direct construction area, provided sanitary facilities, stores / batching areas and resting area only, all other areas are to be marked as No-Go.

7.4. Activity specific impacts and mitigations

The following activity specific impacts were identified during the Basic Environmental Process for the construction phase:

- Ecological including vegetation clearance and habitat disturbance
- Altered flow within the wetland
- Dust
- Visual
- Socio-Economic including job creation and skills transfer, investment in the area

Table 2. Activity specific impacts and mitigations

IMPACT	DESCRIPTION	MITIGATION	RESPONSIBILITY
Ecological Impact	During the removal of vegetation for the proposed subdivision and development would be permanent loss of all or most of the existing natural and partly natural vegetation and faunal habitat in the development footprints (most of it gazetted as Endangered vegetation type). The clearance of vegetation will also result in habitat disruption for some common faunal species such as tortoises, snakes, birds, chameleons etc. Risk – Dust, visual, erosion, loss of indigenous vegetation and destruction of habitat for common fauna	 No erven should intrude significantly into the seasonal wetland portions of the site that support mostly habitat of High ecological sensitivity (as per Figure 4). This means that the following erven should be removed from any authorised layout: 1, 2, 7, 8, 10, 11, 12 and 13. The proposed access road (erf 14) should also be largely removed so that it does not cross the wetland and ecological corridor and can instead access erf 9 along the southern boundary. No pipelines, cabling or infrastructure should be installed across the High sensitivity areas or wetlands. Any boundary fencing used must be permeable to small animals at ground level. The authorised erf and road boundaries should be surveyed and pegged out and fenced on site prior to any site development. No areas of natural or partly natural vegetation should be disturbed outside the pegged/fenced out and authorised erven. No vehicular activity or dumping of material may take place outside the authorised erven or roads. All alien invasive vegetation should be removed from within the natural portions of the project area, prior to any authorised development. Removal of the alien vegetation must be undertaken by a trained and licensed alien vegetation removal team and must be undertaken using methodology outlined in the Best Practise Guidelines (see Martens et al 2021). Do not kill any fauna uncovered during clearing At the onset of construction, all batching, mixing and storage areas should be designated and demarcated as well as rest areas for staff. 	Project Manager / Contractor / ECO / developer
Fauna and Flora	No plant Species of Conservation Concern (SoCC) were recorded during the survey, but at least one may occur on site, based on known occurrence from nearby, similar habitats. At least two bird Species of Conservation Concern (SoCC) may use the site for foraging, and at least one plant SoCC (Disa hallackii)	 Search and Rescue should be done prior to construction for flora and fauna species that may be identified on site. 	Project Manager / Contractor / ECO / developer

	may be present in low numbers, but no plant or animal SoCC were recorded on site during the survey. The Cape Dwarf Chameleon (Bradypodion pumilum) is listed as Vulnerable, and may occur on site.		Duringt Manager /
Noise	Typical Noise impacts associated with the construction phase	 Ensure construction takes place during acceptable work hours Ensure silencers are fitted to noisy machinery 	Project Manager / Contractor / ECO /
		- Machinery to be kept in good working order	developer
	Risk – disturbance to surrounding	- Construction teams to be made aware of surrounding neighbours and potential	
	landowners and employees	noise impact	
Visual	Typical Visual impacts associated with the	- Ensure construction materials are stored in a predetermined area (contractors	Project Manager /
	construction phase	camp) on the site, to prevent sprawl across the site	Contractor / ECO /
		- Ensure the site is kept neat and tidy during construction	developer
	Risk – visual impact of construction and	- Ensure that the site is cleared of all construction materials and machinery once	
	related activities	construction is complete	
		- Ensure all public roads are kept clean and any spills to be cleaned immediately	
Socio-	Job creation and skills transfer during the	- Ensure labour and contractors are sourced locally as far as possible	Project Manager /
Economic	construction phase	- Aim to share skill sets during construction	Contractor / ECO /
		- Encourage the use of water wise, indigenous landscaping, installation of	developer
	Investment in the area	rainwater tanks, reuse of grey water etc to reduce pressure on resources	
	Increased strain on resources, including services		
	Risk – labour not sourced locally, therefore		
	local benefit is limited, strain on services and		
	other local resources		
Dust	Dust generated from site clearing and site	- Maintain ground cover for as long as possible to reduce the total surface area	Project Manager /
	preparation	exposed to wind. Do not clear entire plots and rather clear building sites only	Contractor / ECO /
		- Ensure vehicle speed limits on site are kept to a minimum.	developer
		- Delivery vehicles to keep loads covered.	
		- Cover fine material stockpiles.	

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		 Wet dry and dusty surfaces using non-potable water. Staff to wear correct PPE if dust is generated for long periods. Road surfaces to be swept and kept clean of sand and fine materials 	
Wetland loss	Site clearance, infilling and compaction will result in alteration of the flow regime of the UVBW. Risk – impacts on the wetland water quality, erosion, vegetation removal, impacts from construction water runoff, contamination and trampling	 The significance of this impact can be largely mitigated by demarcating the UVBW wetland area as a No-Go area during construction, conducting rehabilitation within this wetland area; and by ensuring that SW generated onsite flows into the wetland through an appropriately designed broad, vegetated earth swale (to avoid erosion). If possible, conduct construction activities of dwellings, associated stormwater infrastructure and any rehabilitation activities during summer months (November to March). The alien invasive vegetation present within the wetland area must be removed and replanted with indigenous wetland vegetation. It is recommended that a suitably qualified aquatic specialist compiles detailed method statements once the final layout of the proposed project has been formalized. Additionally, a suitable Rehabilitation and Management Plan should be drafted for the wetland area onsite. Bunded, impervious areas that are more than 15 m away from the UVBW must be designated by an Environmental Control Officer for temporary toilets, vehicle parking/servicing areas, and for pouring and mixing of concrete/cement, paint, and chemicals. 	Project Manager Contractor / ECO developer

7.4. General construction phase impacts and requirements

7.4.1. Contractors camp Responsibility – Contractor / ECO / owner

The contractor shall comply will all relevant laws and regulations concerning water provision, sanitation, wastewater discharge and liquid and solid waste handling and disposal during the construction phase. The contractor is referred to the requirements of the NEMA and the NEM:WA and related regulations. The contractor shall not locate the camp, or sanitation facilities, in any areas that can cause nuisance or safety hazards to surrounding land users, inhabitants or the general public. Suitable temporary toilet facilities should be provided to the construction team. These facilities should be emptied and cleaned on a regular basis by a registered contractor and the waste is to be removed by contractor to a registered facility. The contractor shall at all times carefully consider the machinery required for the desired task while minimizing the extent of environmental damage. The contractor shall keep construction campsites clean and tidy at all times. The contractor shall not leave domestic waste uncontained, and temporary storage shall be enclosed to keep out people and animals. No permanent domestic waste disposal shall be permitted. All domestic refuse is to be removed to an existing licensed landfill site. The contractor shall take specific measures to prevent the spread of veld fires, which may be caused by activities at the camp. These measures may include appropriate instruction of employees about the fire risks and the construction of firebreaks around the site perimeter, as required. The contractor shall prevent accelerated erosion from the construction campsite and shall not discharge polluted runoff into the environment. Adequate firefighting equipment shall be made available and maintained on site. the contractors camp should be located in area proposed for development, in order to reduce impacting undisturbed areas. No overnighting will be permitted at the contractors camp, unless specifically arranged or required. Decommissioning of the campsite will involve removal of all compacted platforms, equipment machinery, tools, waste. etc.

7.4.2. Health and Safety

Responsibility - Project Manager / Contractor / ECO / owner

Correct Personal Protective Equipment (PPE) must be worn at all times by the personnel on site. Personnel must be trained on the use of PPE. The applicant will appoint one safety officer for the activities. Suitable warning and information signage should be erected at the commencement of construction. The handling of hazardous materials should only be done by trained personnel. Safety Data Sheets (SDSs) must be readily available for all hazardous substances on site and employees should be aware of the risks associated with any hazardous materials used. All provisions of the Occupational Health and Safety Act (Act No. 85 of 1993) must be complied with. In the event of an emergency relating to a hazardous substance, procedures detailed in the SDSs should be immediately implemented.

7.4.3. Fire risk management

Responsibility - Project Manager / Contractor / ECO / owner

The Applicant / Project manager / contractor should identify a Fire Officer who shall be responsible for ensuring immediate and appropriate actions in the event of a fire and shall ensure that employees are aware of the procedure to be followed. The Fire Officer shall ensure that there is basic fire-fighting equipment available on site at all times. Any fires should be reported to the fire officer immediately.

7.4.4. Fuels and hazardous materials Responsibility - Project Manager / Contractor / owner

Fuels and flammable materials are to be suitably stored, inside the contractor's camp or as appropriate. Impervious materials are to be used in these storage areas to prevent contamination of the ground in the event of spillages or leaks. Quantities of fuels and hazardous materials stored on site should be appropriate to the requirement for these substances on site.

Bulk fuel depots, if required, should be placed within bunded areas to prevent soil contamination in the event of leaks of spills. Bunded areas are to have a holding capacity equal to 110% of the largest fuel container. The relevant Health and Safety requirements for the hazardous materials and fuels should be kept on site in the event of an emergency.

7.4.5. Emergencies protocol Responsibility - Project Manager / Contractor / owner

Fire: The fire officer / suitable other person, should be notified of any fires. Employees should be aware of the procedure to be followed in the event of a fire.

Hydrocarbon (fuel & oil) leaks and spillages: Employees should be aware of the procedure to be followed for dealing with spills and leaks, which shall include notifying the project manager / contractor. All vehicles leaking fuel or other liquids should immediately be removed to the maintenance area and repaired. In the event of a hydrocarbon spillage, the soil must be excavated and treated and adequately disposed. The necessary materials and equipment for dealing with spills and leaks are present on site at all times. The clean-up of sewerage spills and any damage caused by the spill or leak shall be for the applicant's account. The applicant shall ensure that the Health and Safety officer is available for the duration of the construction period.

Raw Sewerage spills (from portable toilets): Employees are to be aware of the procedure to be followed for dealing with spills and leaks. All the necessary materials and equipment for dealing with spills and leaks are present on site at all times. The clean-up of sewerage spills and any damage caused by the spill or leak shall be for the Applicant's account or applicable contractor.

Sudden illness in member of team: emergency numbers should be readily available on site in case of a sudden illness or injury to a construction team member.

Snake bite: Emergency contact numbers must be kept on site in case of a snake siting or snakebite.

7.4.6. Site Demarcation

Responsibility - Project Manager / Contractor / ECO / owner

Prior to any construction commencing, the boundaries of the site and / or the footprints of each dwelling should be appropriately indicated or fenced off by the contractor. Natural areas that should be retained should also be indicated at this stage. Following this, all construction works, as well as the storage or preparation of any materials must be within the demarcated boundaries of the construction zone. No Go areas are to also be demarcated at this stage. The permanent delineated wetland must be clearly demarcated and made a no go area, this should apply to the temporary wetland zones too, as far as possible.

7.4.7. Stockpiles

Responsibility - Project Manager / Contractor / ECO / owner

The contractor and / or project manager should identify sites for the stockpiling of building materials and excavated material. Stockpile sites should preferably be in areas with a gentle gradient. Stockpiles should be stabilised as required and monitored for dust blow and runoff / erosion.

7.4.8. General Wastes

Responsibility - Project Manager / Contractor / ECO / owner

Refuse refers to all construction debris (cement bags, rubble, timber, cans, nails, wire, spilt bitumen, glass, packaging, plastic, organic matter, etc.). Refuse generated during the construction phase should be stored in an appropriate area on site, should be water tight and wind proof, and removed on a regular basis for disposal at a permitted disposal site. Waste bins should be labelled for their designated use. No burning or burying of general refuse on site should be permitted. Recycling and sorting of waste, at the source, is encouraged. Disposal certificates should be kept.

7.4.9. Recreational / Eating areas Responsibility - Project Manager / Contractor / ECO / owner

If construction workers are permitted to eat on the development site, other than within the contractor's camp, the Contractor shall provide adequate refuse bins at all such places and ensure that they are used. Bins are to be cleared on a daily basis. No rest areas are to be permitted in No Go areas.

7.4.10. Construction water

Responsibility - Project Manager / Contractor / ECO / owner

All cement effluent from mixer washings and run-off from batching areas, as well as other work areas, should be contained in suitable manner, these areas should be lined and allowed to dry from time to time in order to remove the solid materials. Care should be taken to prevent the runoff of construction water, to other areas on site or onto adjacent sites.

7.4.11. Equipment maintenance

Responsibility - Project Manager / Contractor / ECO / owner

All mechanical equipment and work vehicles which are present on site during construction, are to be stored, serviced and refuelled only at designated areas or within the contractor's camp. Within these areas drip trays and other impervious materials, for example plastic or metal sheeting, must be used to prevent contamination of the ground. The project manager may order the removal of equipment that is causing continual environmental damage, until such equipment has been repaired.

7.4.12. Stormwater Management

Responsibility - Project Manager / Contractor / ECO / owner

Due to the small-scale nature of the construction, a Stormwater Management Plan is not required. however, Stormwater should be monitored regularly to ensure no environmental risk or unmanageable load to the existing infrastructure. The contractor must take suitable measures to prevent erosion resulting from a diversion, restriction or increase in flow of stormwater caused by construction. The open space erf will be used for stormwater retention.

7.4.13. Topsoil Removal and Stockpiling Responsibility - Project Manager / Contractor / ECO / owner

Where services are to be extended or houses erected, topsoil is to be removed from the work areas, stockpiled separately from subsoil, and must be stabilised within a day of stockpiling. In general, stockpiles should be convex at the top to promote run- off, so that water is not able to accumulate and result in leaching of nutrients from the soil. Stockpiling areas should be determined in consultation with the ECO and only for short term.

7.3.14. Erosion Control Responsibility - Project Manager / Contractor / ECO / owner

Action should be taken to prevent erosion of soils on the construction site. Should any erosion be detected on site, the cause of such erosion should be identified, and appropriate remedial action must be immediately implemented.

7.4.15 Dust Control Responsibility - Project Manager / Contractor / ECO / owner

Appropriate action should be taken to minimise the generation of dust on the site. This can be done by applying appropriate stabilisation materials, such as straw or mulch or watering of exposed areas. Suppression methods not involving water, are preferred as far as possible.

7.4.16. Construction Traffic Management

Responsibility - Project Manager / Contractor / ECO / owner

All construction vehicles which carry construction materials, must use sheeting or a suitable cover, to prevent loss of load during travelling or due to wind or rain. Any spills should be cleaned immediately.

7.4.17. Architecture / Design Responsibility - Project Manager / Contractor / ECO / owner

The architecture and design of the dwellings will be done in line with the general trend of the area. The houses should be designed to be in line with the surrounding architecture and cape vernacular style common to the area. Neutral colour palettes should be used which blend into the surrounds.

7.4.18. Sustainable Building Guidelines and materials Responsibility - Project Manager / Contractor / ECO / owner

The houses should be designed in such a way as to create a sustainable living area. Ensure materials and orientation allow for an environmentally friendly design with lower operating costs, i.e natural ventilation, correct orientation, correct colours and roofing etc. Use recycled materials as far as possible.

Energy efficiency is also an important consideration and the following actions should be considered:

- North orientation to ensure that as many well-used spaces face north as possible. Sun control is more difficult on East and West facing windows

- Use of good insulation in the roof and walls to keep the inside temperature warm in winter or cool in summer
- Solar water heaters to be included in the design phase
- Suitable roof overhangs to let in the lower winter sun but provide shade from the summer sun
- Sensible fenestration let in the light and catch the winter sun, but not too much window area so that warmth or cool cannot be retained inside when needed. They can be combined with shading and reflecting devices such as overhangs, screens, shutters, awnings, trees, planting and different glass types which will aid to control the amount, quality and time of daylight entering the building
- Suitable ventilation for fresh air and cool breezes
- Natural lighting through windows and light wells

Water conservation should be a priority in design of the dwelling. Rainwater tanks are recommended as far as possible. Optimally designed systems for grey water reuse should also be explored during the design phase in order to prevent the expense of retrofitting a system. Water wise and indigenous landscaping is recommended and will reduce the water costs associated with maintaining gardens. Permeable paving is to be used in areas where paving is required. Low flow shower and heads and dual flushing systems should be fitted. Aerators on taps should also be fitted to reduce overall water demand.

Construction activities such as watering, mixing and cleaning should avoid water wastage. Dry brushing and trigger spray nozzles should be used. Reuse of construction water should also be implemented.

7.4.19. Site Clean Up and Rehabilitation

Responsibility - Project Manager / Contractor / ECO/ owner

The following actions should be implemented once construction has concluded:

- The construction footprint should be restored to the natural contours of the ground and shall allow normal surface drainage, as far as possible
- No foreign matter such as rubble, waste or hazardous material will be mixed with the topsoil or used to backfill excavation.
- All temporary works within the construction footprint, including fences, access, roads etc. disturbed by construction, should be restored to their original condition, as far as practical.
- Compacted soils within the construction footprint should be loosened by means of a plough or scarified to aid revegetation
- Runoff and erosion, as a result of the construction phase, should be suitably managed to prevent long term impacts
- All structures, equipment, materials and facilities used or created on site for or during construction activities are removed once the project has been completed
- Vegetation cover (using species appropriate to the local area) in all areas disturbed by the works should be reintroduced, as required.

8. COMPLIANCE AND MONITORING

8.1. Non-compliance

The Environmental Authorisation (EA) stipulates that, *"Non-compliance with a condition of this Environmental Authorisation and the EMP may render the holder liable to criminal prosecution."* It is therefore important that the conditions are adhered to as outlined in the EA and EMP. A Penalties scheme can be used during construction for transgressions.

Transgressions relate to actions by the contractor whereby damage or harm is inflicted upon the environment or any feature thereof and where any of the conditions or specifications of the EMP and EA have been infringed upon. In the instance of environmental damage, the damage is to be repaired and rehabilitated using appropriate measures, as far as possible and as directed by appropriate specialists, if required. These remedial actions are for the account of the contractor or other guilty party as identified by the Project Manager, applicant or ECO. Where non-repairable damage is inflicted upon the environment or non-compliance with any of the EMP / EA obligations is registered, then the Contractor may face a monetary penalty to an amount specified by the Project manager / ECO. The Project manager / ECO reserves the right to implement a first offence warning.

If excessive infringement with regard to any of the specifications is registered, the applicant / project manager / owner reserves the right to terminate the contractor's contract.

Infringement	Description	Penalty
Hydrocarbon / fuel spill	Penalty to be issued when	R 5000
	remediations not implemented	
	timeously	
Disturbance beyond approved	Disturbance to vegetation	R 5000
footprint	beyond approved areas	
Waste management	Inappropriate waste	R 3000 dependent of extent
	management	
Not adhering to conditions of EA	Not attending to specific EA	R 3000 + per condition
	conditions	

Table 3. Penalties Scheme – to be reviewed by ECO if required

8.2. Environmental Control Sheets

Environmental Control Sheets to be used by the ECO on a weekly basis to monitor construction activities to ensure compliance with recommendations. The ECO should familiarise themselves with the full set of recommendations for the site and reasons for these recommendations, as well as understand the site and constraints analysis and be able to identify the constraints / No Go areas.

Table 3. Environmental Control Sheets

				RECORD OF PERFORMANC		ORMANCE	
TASK	ACTION REQUIRED / MITIGATION & METHOD FOR IMPLEMENTATION	FREQUENCY	TARGET / OUTCOME	RESPONSIBILITY	COMPLETED YES/ NO	DATE	COMMENT
			PRE-CONSTRUCTION				
Procurement	 EA and EMP to be distributed to contractor at tender stage to include costing incurred due to compliance with EA and EMP METHOD: Distribute with tender documents 	As required	Contractors are aware of requirements in terms of NEMA and can budget accordingly	Developer Project Manager			
Environmental File	 To include EA, EMP, site diary, public complaints section To be updated on a regular basis Public complaints register Kept on site at all times METHOD: Issue all applicable documents to site manager 	As required	Construction team(s) and general public can access relevant information f and when required	ECO Project Manager			
Environmental Awareness training and induction	 All contractors to attend briefing prior to commencement of site works Register to be signed as proof of attendance METHOD: Briefing to be undertaken by project manager and / ECO 	As required	Construction team(s) informed of all requirements in terms of EMPr and EA	ECO Project Manager			

- Contractors to submit MS seven As required ECO and p	roject manager to be well Contractor
	n terms of methods for
working days prior to	
commencement on site	
- MS to contain clear methods for	
pollution control measures during	
construction including hazardous	
state commencement on site construction - MS to contain clear methods for pollution control measures during construction including hazardous waste, run off, general waste etc. construction METHOD: Request for method	
statements to be contained in tender	
documents	
	narcated site ECO
site demarcation and referring to be repeated with a	ed No Go areas Project Manager
(mark construction areas – an other of a regular	ed construction zones Contractor
areas are No Go) basis in the	
- Access roads for construction event that	
yehicles to be clearly indicated, demarcations	
consideration to be given to shift or	
turning circles disturbed by	
- Review of specialist input to operators,	
familiarise with mitigation weather etc.	
<u>.</u> measures	
- Buffer areas to be indicated and	
demarcated as No Go	
Optimizedvehicles to be clearly indicated, consideration to be given to turning circlesdemarcations shift-Review of specialist input to familiariseoperators, weather etcBuffer areas to be indicated and demarcated as No GoMETHOD: Demarcation methods to be	
undertaken as outlined in EMP, suitable	
to the environment and semi-	
permanent to last as long as possible	
during construction phase, to be	
checked on a regular basis	
- All construction vehicles carrying Duration of A safe wor	king environment with minimal Project Manager
materials must use cover sheeting Construction impact on	No Go areas, minimal dust Contractor
to prevent loss of loads due to wind general pu	nimal loss of load and minimal
materials must use cover sheeting to prevent loss of loads due to wind or rain	blic impact
- Maximum speed to be enforced	

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	- Movement of construction vehicles					
	must be limited to approved haul					
	and access routes and existing					
	tracks					
	METHOD: To be monitored by ECO and					
	project manager as well as construction					
	team leaders					
	- Staff to be aware of actions to be	Duration of	A safe working environment with minimal	Project Manager		
pcol	taken in the event of a natural or	Construction	incidences	Contractor		
roto	medical emergency					
ld si	- Applicable Health and Safety					
Jcie	required in terms of OH&S Act					
Emergencies protocol	METHOD: OH&S officer to be					
me	appointed, appropriate signage to be					
ш	implemented					
	- Fire Management	Duration of	A safe working environment with minimal	Project Manager		
	recommendations to be	Construction	incidences	Contractor		
	implemented		Action plan in the event of a fire			
	- Required firefighting equipment is					
	available on site, and in working					
μ	order					
Fire	- No open fires are lit on site without					
	approval of the ECO and Site					
	Manager					
	METHOD: To be checked by the ECO and					
	project manager and implemented by					
	the contractor					
	- Contractor's Camp is located at the	Duration of	A well placed and functional contractors	Project Manager		
du	most suitable site as identified by	Construction	camp to minimise impacts on other areas on	Contractor		
Contractors camp	the ECO and Site Manager,		site			
tors	preferably in areas to be developed					
raci	or used (i.e roads or house					
ont	footprints) or already transformed					
Ö	areas					
	4.665					

- Contractor team to be briefed			
regarding Do's and Don'ts of camp			
and site in general			
- Suitable toilet facilities are			
provided for all staff			
- Ablutions are to be restricted to			
the facilities provided			
- Toilets are to be kept in a hygienic			
condition and emptied regularly			
METHOD: Site to be determined in			
conjunction with project manager and			
ECO, to be well demarcated with			
appropriate signage, serviced and			
cleaned on a regular basis, checked by			
ECO			

	CONSTRUCTION							
TASK	ACTION REQUIRED / MITIGATION & METHOD FOR IMPLEMENTATION	FREQUENCY	TARGET / OUTCOME	RESPONSIBILITY	COMPLETED YES/ NO	DATE	COMMENT	
Topsoil removal and stockpiling	 Replaced immediately after works where required Topsoil which is required to be removed from direct work areas, should be stockpiled separately from subsoil and reused as far as possible Stockpiles should be suitably shaped to prevent leaching of nutrients, and stabilized, or dispersal by wind or rain Stockpiles to be monitored for dispersal by rain and wind METHOD: Implement conditions outlined in EMP for stockpiling and topsoil removal 	Duration of Construction	Reusable sand and soil stockpiles to facilitate rehabilitation of the site	Project Manager Contractor				
Earthworks	 Works to be restricted construction area only Bulldozer/ heavy machinery operators to be under constant supervision particularly at onset of works Use and excessive movement of heavy machinery to be avoided in areas of environmental sensitivity or high erosion potential Trenching to be undertaken in a phased manner 	Duration of Construction	Minimal disturbance to sensitive zones, minimal disturbance to vegetation	Project manager Contractor ECO				

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	- Fill material to be replaced in same					
	work area from which it originated					
	- Fill material to be compacted to its					
	approximate original density					
	METHOD: Construction zone to be					
	clearly demarcated, instruction for					
	stockpiling to be implemented,					
	operators to be briefed prior to works					
	- Fuels and hazardous materials to	Duration of	Minimal disturbance to sensitive zones	Project Manager		
	be stored in suitably equipped	Construction	including dunes and beach	Contractor		
	storage areas in the Contractor's		Minimal incidences			
	camp and approved by the ECO					
e	- Strict measures to be put in place					
Drag	for the use and storage of					
stc	hazardous materials on site					
and	- Disposal to licenced facility only					
ing.	- These areas shall comply with fire					
Material handling, dispatching and storage	safety requirements					
spa	- Impervious materials are to be					
di	used to prevent contamination of					
Bulling	the ground in the event of spillages					
anc	or leaks					
al h	- Construction materials spilled on					
teri	public or private roads to be					
Z	immediately cleaned					
	- No storage other than contractor					
	camp					
	METHODS: Undertake regular					
	inspections of areas and procedures					
	- Sites for stockpiling as identified by	Duration of	Reusable sand and soil stockpiles to	Project Manager		
S	the Contractor are to be marked on	Construction	facilitate rehabilitation of the site	Contractor		
Stockpiles	a plan, and approved by the ECO			ECO		
ockl	and Site Manager					
Sti	- Stockpiles must be suitably					
	stabilized where necessary					
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	METHODS: Undertake regular checks of				
	stockpiles to ensure methods outlined				
	in the EMP and Dune EMP are				
	implemented				
	- All waste to be stored in an	Duration of	A clean waste collection point which is	Project Manager	
	appropriate contained area on site,	Construction	serviced on a regular basis	Contractor ECO	
	and protected against wind, rain			ECO	
	and animal dispersal				
	- Waste to be removed on a weekly				
ent	basis for disposal at a permitted				
em	disposal site				
Jag	- No burning or burying of refuse on				
mai	site is allowed				
Waste management	- Eating areas must be demarcated				
Ma	and provided with suitable refuse				
-	collection areas				
	METHOD: Waste areas to be designed				
	correctly and be wind and				
	weatherproof and emptied on a regular				
	basis				
	- Careful runoff management will be	Duration of	A clean site post construction	Project Manager	
	required particularly during	Construction		Contractor	
	construction. No contaminated			ECO	
ē	water should be allowed to seep				
wat	into the ground or runoff the				
ste	construction site				
e A	- All runoff from batching plants,				
tion	work areas and mixer washings to				
Construction wastewater	be contained in sedimentation				
inst	ponds, which are suitably lined				
C	- Ponds must be allowed to dry out				
	regularly, and solid waste removed				
	and disposed of at a site approved				
	by the local authority.				

	METHOD: Wastewater areas to be suitably designed and inspected on a regular basis					
	- All mechanical equipment and	Duration of	A clean site post construction	Project Manager Contractor		
Maintenance of equipment	 work vehicles to be stored, serviced and refuelled at designated areas in the contractor's camp Major services to take place off site Drip trays or impervious materials to be used to prevent 	Construction		ECO		
Mainte	contamination of ground METHOD: Regular inspections undertaken					
	 Suitable measures must be in place to prevent erosion resulting from diversion, restriction or increase in stormwater runoff 	Duration of Construction	A clean site post construction, avoiding additional impact on surrounds	Project Manager Contractor ECO		
Stormwater	 Measures must be taken to prevent stormwater from flowing from excavated areas or stockpiles Stormwater containing harmful substances to be contained, and 					
	removed from site METHOD: Regular inspections undertaken					
Erosion	 Stormwater channels are to be kept clear from soil and debris Erosion or stormwater damage resulting from Contractor's operations to be suitably repaired 	Duration of Construction	A clean site post construction, avoiding additional impact on surrounds	Project Manager Contractor ECO		
	 Suitable stabilization measures are to be implemented wherever 					

	works are taking place as outlined					
	in this document					
	- Where erosion is detected,					
	suitable mitigation methods are to					
	be employed as soon as possible					
	METHOD: Regular visual inspections					
	undertaken					
	- Sand stockpiles are to be covered	Duration of	A clean site post construction, avoiding	Project Manager		
	with Hessian, shade cloth or DPC	Construction	additional impact on surrounds, avoidance	Contractor		
	plastic		of impacts on general public	ECO		
	- Stockpiles are to be located in					
	sheltered areas and the useable					
	face to be orientated away from					
	the prevailing wind					
	- Excavation and transporting					
	erodible material during high wind					
	conditions - water dampening					
	measures or cessation of activities					
	should be required					
	- If necessary, certain components					
Dust	of the work should be stopped					
DC						
	until conditions are more favourable					
	- Vehicles must not exceed 40 km/h					
	along gravel roads					
	- If roads generate unacceptable					
	levels of dust, suppression					
	measures should be introduced					
	- If water is used only the critical					
	areas should be watered by cart or					
	hand to avoid unnecessary run-off,					
	erosion or misuse					
	METHOD: Areas and activities of					
	possible dust generation to be					

	inspected on a regular basis, as well as strategies to address dust					
Site clean-up and rehabilitation	 All structures, equipment materials and facilities are to be removed from site on completion of the project Construction site shall be cleared and cleaned to the ECO's satisfaction Site / Area Rehabilitation to be conducted in line with recommendations herein Specialist advice to be sort where required No waste or remaining materials to be buried on site METHOD: Inspected upon site closure / suspension of works, rehabilitation methods contained in EMP and Dune EMP to be implemented 	Duration of Construction	A functional ecosystem post construction, suitably rehabilitated as required	Project Manager Contractor ECO		

9. ENVIRONMENTAL AUDITS

The purpose of auditing is to determine and monitor compliance with the EMP and EA, and measure its effectiveness in mitigating environmental impacts. In terms of Regulation 34 of the NEMA EIA Regulations, 2014, the holder of the EA must conduct environmental audits in order to determine compliance with the conditions of the EA and EMP. Environmental Audit Reports should be submitted to the Competent Authority or as stipulated in the EA. The audit reports should be prepared by an independent person. The audit report should also provide recommendations regarding the need to amend the EMP.

The objective of the environmental audit report is to:

- Report on the level of compliance with the conditions of the EA and the EMP
- Report on the extent to which the avoidance, management and mitigation measures outlined in the EMP, achieve the objectives and outcomes of the EMP
- Identify and assess any new impacts and risks as a result of the activity
- Evaluate the effectiveness of the EMP
- Identify shortcomings in the EMP
- Identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMP

An environmental audit report should contain the following:

- Details and expertise of the independent person who prepared the environmental audit report
- A declaration that the auditor is independent
- An indication of the scope of, and the purpose for which, the environmental audit report was prepared
- A description of the methodology adopted in preparing the environmental audit report
- An indication of the ability of the EMP to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity as well as to ensure compliance with the provisions of environmental authorisation and EMP.
- A description of any assumptions made, and any uncertainties or gaps in knowledge
- A description of any consultation process that was undertaken during the course of carrying out the environmental audit report if required
- A summary and copies of any comments that were received during any consultation process
- Any other information requested by the competent authority.

Given the nature of the development proposed, environmental audits may be difficult to undertake, but should be done as far as reasonably and practically possible.

10. CONCLUSION

An EMP has been developed as part of the Basic Assessment process to ensure that mitigation and management measures are enforced during the construction phase of the development, and that the conditions of the EA are upheld. The EMP should guide all phases of the project to minimize possible negative impacts and assign responsibility for environmental controls. The EMP provides a tool to recognise the needs of the environment and is intended to be utilised in conjunction with the Environmental Authorisation.

11. DECLARATION OF CONTRACTOR'S ACCEPTANCE

I, _____ (name), representing ______ (company name), have read and understood the above Environmental Management Plan and hereby acknowledge its contents and requirements as a framework for my company's environmental performance during the applicable development.

Signed:	 _ Date:

