



# ECC

**ENVIRONMENTAL**  
COMPLIANCE CONSULTANCY



ECC-36-268-REP-07-A

## **ENVIRONMENTAL MANAGEMENT PLAN**

### **PROPOSED AGRICULTURE PROJECT FOR FARM**

### **ERHARDSHOF 575, OTJOZONDJUPA REGION**

*PREPARED FOR*



JULY 2020

## TITLE AND APPROVAL PAGE

<b>Project Name:</b>	Environmental Management Plan for the proposed Agriculture Project for farm Erhardshof 575, Otjozondjupa Region
<b>Client Name:</b>	B2Gold Namibia Properties (Pty) Ltd
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## DEFINITIONS AND ABBREVIATIONS

ECC	Environmental Compliance Consultancy
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
I&APs	Interested and affected parties

# 1 INTRODUCTION

## 1.1 PROJECT BACKGROUND

B2Gold Namibia Properties (Pty) Ltd (herein referred to as the proponent) intends to develop the Otjikoto Agricultural Project – an irrigation project in line with the Otjikoto gold Mine closure plan. The proposed project will be located on Farm Erhardshof 575, which is approximately 3 522 hectares in size, and of which the total irrigated project size, at the end of the final phase will be 135 hectares. The farm is located east of the B1 road approximately 55 km from Otavi. The intention is to develop the irrigated area in a phased process, step-by-step as more information becomes available, initially planting fodder for cattle and high value game species in the form of Katambora Rhodes grass, as well as planting rotational grain crops in the form of maize and wheat. The first phase will be on only two fields of 15ha each, under center pivot irrigation, to test the project concept. One 15ha pivot will be commissioned in October 2020 with the second one commissioned later that season. If the concept proves viable, the further expansion phases will be implemented.

The proposed project will develop in four phases as described below:

- The first phase, year 1: 15ha starting October 2020, then expanding later that season to
- Phase 2 which is 30ha in total (adding 15ha) and if feasible expand to
- The third phase, year 2: 75ha (extra 45ha added, and
- The fourth phase, year 3: 135ha (another 60ha added).

The proposed agricultural project will implement a center pivot irrigation system, using three water supply boreholes connected to a pipeline for water supply. No water storage dam is planned. A 11kV overhead powerline will be constructed over a distance of approximately 8.1km from the B2Gold solar plant on the farm Wolfshag to Erhardshof for the operation of the pivots. Initial power supply will be from Cenored for the early phases.

## 1.2 ENVIRONMENTAL REGULATORY REQUIREMENTS

In terms of the Environmental Impact Assessment (EIA) Regulations and the Environmental Management Act, No. 7 of 2007, the proposed development qualifies as a listed activity. Therefore, an application for an environmental clearance certificate is to be submitted. An Environmental Scoping Report and Environmental Management Plan (EMP) are required to be submitted as part of the application process to support the decision-making of the relevant government departments. This report presents the EMP.

## 1.3 PURPOSE AND SCOPE OF THIS REPORT

ECC has been contracted by B2Gold Namibia Properties (Pty) Ltd to compile an EMP in terms of the Environmental Management Act, No.7 of 2007.

The purpose of this EMP is to provide a management framework for the planning and implementation of the construction and operation activities for the proposed project so that the potential environmental impacts are avoided, minimised and mitigated as far as reasonably practicable, and that statutory requirements and other legal obligations are fulfilled.

This EMP also presents protocols, procedures, roles and responsibilities to ensure the management arrangements are appropriately and effectively implemented. This EMP forms an appendix to the Environmental Scoping Report and has

been based on the findings of the assessment; therefore, the Environmental Scoping Report should be referred to for further information on the proposed project, assessment methodology, applicable legislation, and assessment findings.

#### 1.4 MANAGEMENT OF THIS EMP

B2Gold Namibia Properties (Pty) Ltd will hold the environmental clearance certificate for the proposed project and will be responsible for the implementation and management of this EMP. Prior to the construction works commencing, this EMP will be reviewed, amended as required and approved ready for implementation. The implementation and management of this EMP, and thus the monitoring of compliance, will be undertaken through daily duties and activities and monthly inspections.

This EMP will be circulated to all contractors and will be made available on ECC's website.

#### 1.5 LIMITATIONS, UNCERTAINTIES AND ASSUMPTIONS OF THIS EMP

This EMP does not include measures for compliance with statutory occupational health and safety requirements.

Where there is any conflict between the provisions of this EMP and any contractor's obligations under their respective contracts, including statutory requirements (such as licences, project approval conditions, permits, standards, guidelines, and relevant laws), the contract and statutory requirements are to take precedence.

The information contained in this EMP has been based on the project description as provided in the Environmental Scoping Report. Where the design or construction methods alter, this EMP may require updating and potential further assessment to be undertaken.

#### 1.6 ENVIRONMENTAL CONSULTANCY

Environmental Compliance Consultancy (ECC), a Namibian consultancy with registration number 2013/11401, has prepared this EMP on behalf of the proponent. ECC operates exclusively in the environmental, social, health and safety fields for clients across Southern Africa, in the public and private sectors. ECC is independent of the proponent and has no vested or financial interest in the proposed project, except for fair remuneration for professional services rendered.

All compliance and regulatory requirements regarding this document should be forwarded by email or posted to the following address:

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## 1.7 STRUCTURE OF THIS EMP

The following structure has been adopted for this Report:

- Chapter 1 – Introduction
- Chapter 2 – Project Management Personnel
- Chapter 3 – Communications and Training
- Chapter 4 – Reporting, Compliance, and Enforcement
- Chapter 5 – Environmental and Social Management, and
- Chapter 6 – Implementation of the EMP.

## 2 PROJECT MANAGEMENT PERSONNEL

This EMP provides measures, guidelines, and procedures for managing and mitigating potential environmental impacts. The EMP also indicates monitoring and reporting requirements and sets responsibilities for those carrying out management and mitigation measures. B2Gold Namibia will provide a project team to oversee and undertake the preparation and construction works, which will be composed of the proponent’s personnel and contractors. A nominated role will be identified to ensure the maintenance of the proposed project is undertaken through the operations phase.

### 2.1 ORGANISATIONAL STRUCTURE, ROLES, AND RESPONSIBILITIES

The proponent will be responsible for:

- Ensuring all members of the project team, including contractors, comply with the procedures set out in this EMP
- Ensuring that all persons are provided with sufficient training, supervision, and instruction to fulfil this requirement, and
- Ensuring that any persons allocated specific environmental responsibilities are notified of their appointment and confirm that their responsibilities are clearly understood.

Contractors will be responsible for ensuring and demonstrating that all personnel employed by them are compliant with this EMP, and meet the responsibilities listed above.

The key personnel and environmental responsibilities of each role are presented in Table 1.

**TABLE 1 – KEY ROLES AND RESPONSIBILITIES**

ROLE	RESPONSIBILITY & DUTIES
Proponent	<ul style="list-style-type: none"> <li>- Overall responsibility for the implementation and management of this EMP</li> <li>- Ensure environmental policy is communicated to all personnel throughout the proposed project, and</li> <li>- Responsible for providing the required resources (including financial and technical) to complete the required tasks.</li> </ul>
Project Manager	<ul style="list-style-type: none"> <li>- Responsible for ensuring compliance with this EMP including overseeing the construction works, day to day activities during operations, and routine and non-routine maintenance works during operations, as well as the decommissioning of the development</li> <li>- Ensuring all personnel are aware of the commitments made in this EMP and any other relevant regulatory requirements applicable to the project</li> <li>- Responsible for the management, maintenance and revisions of this EMP</li> <li>- Ensuring adequate resources are made available for implementation of this EMP</li> <li>- Maintain the community issues and concern register and keep records of complaints</li> <li>- Ensuring all employees and contractors participate in a site induction process prior to commencing work on the project</li> <li>- Maintain an up to date register of employees who have completed the site induction</li> </ul>

ROLE	RESPONSIBILITY & DUTIES
	<ul style="list-style-type: none"> <li>- Provisioning of environmental awareness/management training and inductions for all employees</li> <li>- Ensuring that best environmental practice is undertaken throughout the duration of the project, and</li> <li>- Report any non-compliance or accidents to the regulatory authority.</li> </ul>
Site manager/contractors	<ul style="list-style-type: none"> <li>- Appointed to manage the performance of the construction and operational maintenance activities. Responsible for the implementation of this EMP and ensuring all activities are compliant with this EMP, as well as:               <ul style="list-style-type: none"> <li>o Managing the preparation and implementation of method statements for certain activities, and ensuring the environmental officer reviews all method statements and the relevant environmental protocols are incorporated</li> <li>o Reporting any non-compliance or accidents to the project manager and environmental officer</li> <li>o Ensuring that all staff have attended a site induction session before the commencement of any work on-site and that they are adequately informed of the requirements of this management plan</li> <li>o Ensuring that all contract workers, sub-contractors and visitors to the site are conversant with the requirements of this EMP, relevant to their roles on site and always adhere to this EMP, and</li> <li>o Receiving, responding to and recording complaints.</li> </ul> </li> </ul>
Employees/contractor employees	<ul style="list-style-type: none"> <li>- Responsible for being compliant with this EMP throughout the construction work and operations, in addition to:               <ul style="list-style-type: none"> <li>o Ensuring they have undertaken a site induction and are conversant with the requirements of this EMP</li> <li>o Ensuring appropriate briefings for certain activities have been provided and fully understood</li> <li>o Adherence to this EMP, and</li> <li>o Reporting of any operations and conditions that deviate from the EMP or any non-compliant issues or accidents to the environmental officer and Site Manager/Contractor.</li> </ul> </li> </ul>
Environmental Control Officer	<ul style="list-style-type: none"> <li>- An Environmental Control Officer (ECO) will be appointed or nominated responsible for the project. The ECO will be available, as required, throughout the construction and operation of the project. The ECO will be responsible for the following roles:               <ul style="list-style-type: none"> <li>o Ensuring that the site and project manager are aware of the environmental management plan procedures</li> <li>o For monitoring of site and enforcing health and hygiene measures</li> <li>o Investigate when there is an environmental incident, and</li> <li>o Conserving the environment and the resources.</li> </ul> </li> </ul>

## 2.2 CONTRACTORS

Any contractors hired during the construction works or maintenance activities during the operational phase will be compliant with this EMP, and will be responsible for the following:

- Undertaking activities in accordance with this EMP as well as relevant policies, procedures, management plans, statutory requirements, and contract requirements
- Implementing appropriate environmental and safety management measures
- Reporting of environmental issues, including actual or potential environmental incidents and hazards, to the site manager and/or project manager, and
- Ensuring appropriate corrective or remedial action is taken to address all environmental hazards and incidents reported by employees and subcontractors.

## 2.3 EMPLOYMENT

The proponent and all contractors will comply with the requirements of the Republic of Namibia Regulations for Labour, Health and Safety, and any amendments to these regulations. The following will be complied with:

- In liaison with local government and community authorities, the proponent will ensure that local people have access to information about job opportunities and are considered first for construction and maintenance contract employment positions
- The number of job opportunities will be made known together with the associated skills and qualifications
- The maximum length of time the job is likely to last for will be clearly indicated
- Foreign workers with no proof of permanent legal residence will not be hired, and
- Every effort will be made to recruit from the pool of unemployed workers living in the local area.

## 2.4 REGISTER OF ENVIRONMENTAL RISKS AND ISSUES

An environmental review of the proposed project has been completed to identify all the commitments and agreements made within the environmental scoping report. A list of environmental commitments and risks has been produced, which details deliverables including measures identified for the prevention of pollution or damage to the environment during the construction and operational phase.

Table 2 provides a register of environmental risks and issues, which identifies mitigation and monitoring measures, as well as the responsible person. This register will be subject to regular review by the project manager and updated when necessary. The project manager and site manager will use this register to undertake monthly inspections to ensure the project is compliant with this EMP.

**TABLE 2 – A LIST OF ENVIRONMENTAL RISKS AND ISSUES WITH MITIGATION AND MONITORING MEASURES FOR THE OTJIKOTO AGRICULTURAL PROJECT**

ASPECT	POTENTIAL IMPACTS	MANAGEMENT/MITIGATION MEASURES	MONITORING REQUIREMENTS	RESPONSIBILITY
Having screened all potential impacts and having assessed those applicable to the criteria, points relevant to the impacts and corresponding mitigation measures are summarized below.				
Clearing of vegetation	<ul style="list-style-type: none"> <li>Clearing of vegetation through the process of expanding land for irrigation agriculture can cause loss of habitat is likely to lead to loss of biodiversity</li> </ul>	<ul style="list-style-type: none"> <li>Where possible, the clearing of vegetation, particularly of indigenous trees needs to be avoided during the development phase</li> <li>Avoid sensitive ecological areas where possible</li> <li>Where possible, buffer the special, sensitive and ecologically important habitats</li> </ul>	<ul style="list-style-type: none"> <li>Daily observations</li> </ul>	<ul style="list-style-type: none"> <li>Project manager</li> <li>Employees</li> </ul>
Construction of the 11 kV powerline	<ul style="list-style-type: none"> <li>Physical disturbance of birds and habitat destruction/modification</li> <li>Potential bird fatalities</li> </ul>	<ul style="list-style-type: none"> <li>Before construction starts (or burying of the power line), the proposed power line route should be inspected for any signs of bird nesting activity</li> <li>The unnecessary destruction of habitat (including large trees) or degradation of the environment, including sensitive habitats such as water points and ephemeral pan areas, should be avoided</li> <li>Ongoing awareness should be promoted about the value of biodiversity and the negative impacts of disturbance, especially to breeding birds, and of poaching and road mortalities. At the same time, the need for reporting power line incidents should be stressed, and reporting procedures clarified</li> <li>Anti-poaching measures should be strictly enforced, with zero tolerance, and this should be emphasised during induction to contractors; offenders should be prosecuted</li> </ul>	<ul style="list-style-type: none"> <li>Daily observations</li> </ul>	<ul style="list-style-type: none"> <li>Project manager</li> <li>Employees</li> </ul>
Construction of the 11 kV powerline	<ul style="list-style-type: none"> <li>Collision of birds on power line structures</li> </ul>	<ul style="list-style-type: none"> <li>Proactive marking of the entire length of the power line is recommended to increase visibility to birds</li> <li>At least the top conductor should be marked, along the full length of each span. Should monitoring indicate sections of power line that remain problematic in terms of repeated incidents, further mitigation should be investigated</li> <li>The marking distance between devices should be 5-10 m, with offset designs/colours</li> </ul>	<ul style="list-style-type: none"> <li>Daily observations</li> <li>Weekly bird monitoring</li> </ul>	<ul style="list-style-type: none"> <li>Project manager</li> <li>Employees</li> </ul>

ASPECT	POTENTIAL IMPACTS	MANAGEMENT/MITIGATION MEASURES	MONITORING REQUIREMENTS	RESPONSIBILITY
		<ul style="list-style-type: none"> <li>At this stage no nocturnally visible marking is recommended, but it should become mandatory should monitoring results indicate the necessity (e.g. repeat collisions of nocturnal fliers such as flamingos or grebes). The need for fitting additional mitigation for collisions on stay wires (e.g. with vibration dampers) or on any other structures should likewise be based on monitoring results</li> </ul>		
Abstraction of groundwater	<ul style="list-style-type: none"> <li>Drawdown of groundwater level could impact neighbouring groundwater users</li> </ul>	<ul style="list-style-type: none"> <li>Start the project on smaller scale and increase step-by-step with good monitoring</li> <li>Improve water use efficiency by producing high value crops for volumes of water abstracted and using water efficient irrigation systems</li> <li>Supply neighbouring farmers with alternative water supply if impacts reduce their water availability – develop specific action plans for trigger values indicated by monitoring (groundwater level dropping by more than 5m with no recovery after the rainy season)</li> <li>Drill needed monitoring boreholes to the north east and monitor monthly</li> <li>Update the existing hydrocensus to ensure correct farms have monitoring boreholes</li> <li>Update the groundwater model to a transient model with new monitoring data</li> </ul>	<ul style="list-style-type: none"> <li>Weekly water volume monitoring</li> <li>Monthly groundwater level measurement</li> <li>Quarterly groundwater sampling</li> </ul>	<ul style="list-style-type: none"> <li>Project manager</li> <li>Environmental officer</li> </ul>
Increased disturbance of soil	<ul style="list-style-type: none"> <li>The increased run-off water erosion and subsequently gully formation</li> </ul>	<ul style="list-style-type: none"> <li>Construction of contour bunds to reduce erosion where needed</li> <li>Implementation of zero till agricultural practices</li> </ul>	<ul style="list-style-type: none"> <li>Daily observations</li> </ul>	<ul style="list-style-type: none"> <li>Project manager</li> <li>Employees</li> </ul>
Waste generation	<ul style="list-style-type: none"> <li>Value addition of agricultural produce will result in generation of both solid waste and wastewater which may have negative impacts unless effectively managed</li> </ul>	<ul style="list-style-type: none"> <li>Put in place appropriate waste management mechanisms for both solid waste and wastewater</li> <li>Ensure wastewater produced from agricultural activities is properly managed</li> <li>Waste storage sites should be established on site were paper, plastic and wire should be kept</li> </ul>	<ul style="list-style-type: none"> <li>Daily inspection</li> <li>Monthly monitoring</li> </ul>	<ul style="list-style-type: none"> <li>Project manager</li> <li>Environmental officer</li> </ul>

ASPECT	POTENTIAL IMPACTS	MANAGEMENT/MITIGATION MEASURES	MONITORING REQUIREMENTS	RESPONSIBILITY
		<ul style="list-style-type: none"> <li>- The collected solid waste should be disposed at an approved waste site for the mine, after being collected by an agreed contractor</li> <li>- Ensure maximum re-use of the excavated materials and biomass</li> </ul>		
Agricultural activity can cause pollution of groundwater and surface water	<ul style="list-style-type: none"> <li>- The use of fertilizers and pesticides due to the nature of the crops and the quality of the soil could lead to contamination</li> </ul>	<ul style="list-style-type: none"> <li>- Proper design of the irrigation scheduling considering the nature of the soil</li> <li>- Increase organic material in the soil to improve the infiltration rate and water holding capacity</li> <li>- Availability of spillage clean-up kits for chemical spills</li> <li>- Ensure proper storage of fertiliser and pesticides</li> <li>- Education of staff on dangers of pesticides and proper handling of chemicals</li> <li>- Monitor irrigation water quality</li> <li>- Monitor groundwater quality</li> </ul>	<ul style="list-style-type: none"> <li>- Daily observations</li> <li>- Quarterly water sampling</li> </ul>	<ul style="list-style-type: none"> <li>- Project manager</li> <li>- Environmental officer</li> <li>- Employees</li> </ul>
Fertigation with liquid fertilizers	<ul style="list-style-type: none"> <li>- Spillage or breakage of fertilizer containers</li> </ul>	<ul style="list-style-type: none"> <li>- Routine inspection and maintenance of fertiliser holding facility</li> <li>- Availability of spillage clean-up kits for chemical spills</li> </ul>	<ul style="list-style-type: none"> <li>- Daily observations</li> <li>- Preventative maintenance</li> <li>- Incident reporting</li> </ul>	<ul style="list-style-type: none"> <li>- Project manager</li> <li>- Environmental officer</li> <li>- Employees</li> </ul>
Agricultural production	<ul style="list-style-type: none"> <li>- The proposed project will create employment opportunities</li> </ul>	<ul style="list-style-type: none"> <li>- Inform the communities about employment opportunities and required skills</li> <li>- Prioritise job opportunity to Namibian citizens</li> <li>- Maximise local employment and local business opportunities</li> <li>- Enhance the use of local labour and local skills as far as reasonably possible</li> <li>- Ensure that goods and services are sourced from the local and regional suppliers</li> </ul>	<ul style="list-style-type: none"> <li>- Proactive communication with communities</li> <li>- Employment policy</li> </ul>	<ul style="list-style-type: none"> <li>- Project manager</li> <li>- Human capital manager</li> <li>- Financial manager</li> </ul>
Procurement of goods and services	<ul style="list-style-type: none"> <li>- Sourcing of goods and services from local or regional business could increase economic benefits</li> </ul>	<ul style="list-style-type: none"> <li>- Provide opportunities to local and regional enterprise to participate in tender processes</li> <li>- Where possible, procurement of goods and services should be from the local or regional businesses</li> </ul>	<ul style="list-style-type: none"> <li>- Procurement policy</li> </ul>	<ul style="list-style-type: none"> <li>- Project manager</li> <li>- Financial manager</li> </ul>

### 3 COMMUNICATION AND TRAINING

In order to ensure potential risks and impacts are minimised, it is vital that personnel are appropriately informed and trained on operational procedures that include the above mitigation measures. It is also important that regular communications are maintained with all the stakeholders, making them aware of potential impacts and how to minimise or avoid them. This section sets out the framework for communication and training in relation to the EMP.

#### 3.1 COMMUNICATION

During construction, the project manager and site manager will communicate site-wide environmental issues to the project team through the following means (as and when required):

- Site induction
- Audits and site inspections
- Toolbox talks, including instruction on incident response procedures, and
- Briefings on key project-specific environmental issues

This EMP will be distributed to the construction project team, including contractors, to ensure that the environmental requirements are communicated effectively. Key activities and environmentally sensitive operations will also be briefed to workers and contractors.

During the construction phase, regular communications between the management team will include discussing any complaints received and actions to resolve them; any inspections, audits or non-conformance with this EMP; and any objectives or target achievements.

#### 3.2 ENVIRONMENTAL EMERGENCY AND RESPONSE

Table 3 contains a list of numbers to be contacted in case of an emergency. All personnel will be made aware of these numbers.

**TABLE 3 – EMERGENCY CONTACT DETAILS**

TOWN	AMBULANCE	POLICE	FIRE BRIGADE
Otjiwarongo	+264 (67) 30 3734	+264 (67) 219 048 or 10111	+264 (67) 30 4444

#### 3.3 COMPLAINTS HANDLING AND RECORDING

Any complaints received verbally or in writing by any personnel on the project site will be recorded by the receiver, including the name and contact details of the complainant, date and time of the complaint, and the nature of the complaint. The information will be given to the project manager who is overall responsible for the management of complaints and will provide a written response to the complainant. The project manager will inform the site manager of issues, concerns or complaints.

The project manager will maintain a complaint register that will detail the name and contact details of the complainant, date and time of the complaint, nature of the complaint, action taken to resolve issues, and date of complaint handover. The project manager will be responsible for nominating the correct personnel to coordinate and resolve the issue.

The workforce will be informed about the complaints register, its location and the person responsible, in order to refer local residents or the general public who wish to lodge a complaint. The complainant will be informed in writing of the results of the investigation and action to be taken to rectify or address the matter(s). Where no action is taken, the reasons are to be recorded in the register and the complainant inform thereof.

The complaints register will be kept for the duration of the project and will be available for government or public review upon request.

### 3.4 TRAINING, SITE INDUCTION AND AWARENESS

All personnel working on the project will be competent to perform tasks that have the potential to cause an environmental impact. Competence is defined in terms of appropriate education, training, and experience.

All personnel involved in the project will be inducted to the site with specific environmental and social awareness training, and health and safety training. The environment and social awareness training will ensure that personnel are familiar with the principles of this EMP; the environment and social aspects and impacts associated with their activities; the procedures in place to control these impacts; and the consequences of departure from these procedures.

The project manager will ensure a register of completed training is maintained.

The site induction should include, but not limited to the following:

- A general site-specific induction that outlines:
  - o What is meant by “environment” and “social”
  - o Why the environment needs to be protected and conserved
  - o How construction activities can impact on the environment, and
  - o What can be done to mitigate against such impacts.
- The inductee’s role and responsibility with respect to implementing the EMP
- The site environmental rules
- Details of how to deal with, and who to contact if environmental problems should occur
- Basic vegetation clearing principals and species identification sheets
- The potential consequences of non-compliance with this EMP and relevant statutory requirements, and
- The role of responsible people for the project.

## 4 REPORTING, COMPLIANCE, AND ENFORCEMENT

### 4.1 ENVIRONMENTAL PERFORMANCE MANAGEMENT

The summary of a register of environmental risks and issues identifies mitigation and monitoring measures, as well as roles responsible. This register will be subject to regular review by the project manager and updated when necessary. The project manager and site manager will use this register to undertake monthly inspections to ensure the project is compliant with this EMP.

### 4.2 CONSTRUCTION: ENVIRONMENTAL INSPECTIONS & COMPLIANCE MONITORING

#### 4.2.1. DAILY COMPLIANCE MONITORING

A copy of this EMP will be on-site throughout the construction works and will be available upon request. It is the responsibility of the project manager and site manager to ensure this EMP is complied with through their daily roles. Daily inspections will be undertaken by the site manager (or nominated site supervisor). Any environmental problems or risks identified will be notified to the project manager and actioned as soon as is reasonably practicable.

#### 4.2.2. MONTHLY COMPLIANCE MONITORING

Monthly inspections will be undertaken by the site manager to check that the standards and procedures set out in this EMP are being complied with and pollution control measures are in place and working correctly. Any non-conformance will be recorded, including the following details: a brief description of non-conformance; the reason for the non-conformance; the responsible party; the result (consequence); and the corrective action taken; and any necessary follow up measures required.

### 4.3 OPERATIONS: ENVIRONMENTAL INSPECTIONS AND, COMPLIANCE MONITORING

Annual inspections of the power line will be managed and undertaken by the project manager. The overhead power line and its associated infrastructure (access road and servitude) will be inspected and maintained to ensure that the equipment is operating as per specification, no damage has been caused and vegetation is cleared under the power line. Any non-conformance will be recorded, including the following details: a brief description of non-conformance; the reason for the non-conformance; the responsible party; the result (consequence); and the corrective action is taken and any necessary follow up measures required.

### 4.4 REPORTING

There will be a requirement to ensure that any incident or non-compliance, including any environmental issue, failure of equipment or accident, is reported to the project manager.

### 4.5 NON-COMPLIANCE

Where it has been identified that works are not compliant with this EMP, the project manager will employ corrective actions so that the works return to being compliant as soon as possible. In instances where the requirements of the EMP are not upheld, a non-conformance and corrective action notice will be produced. The notice will be generated

during the inspections and the project manager will be responsible for ensuring a corrective action plan is established and implemented to address the identified shortcoming.

A non-compliance event/situation, for example, is considered if:

- There is evidence of the contravention of this EMP and associated indicators or objectives
- The site manager and/or contractor have failed to comply with corrective or other instructions issued by the project manager or qualified authority, or
- The site manager and/or contractor fail to respond to complaints from the public.

Work will be stopped in the event of a non-compliance until corrective action(s) has been initiated.

#### 4.6 DISCIPLINARY ACTION

This EMP is a legally binding document and non-compliance with it will result in disciplinary action being taken against the perpetrator/s. Such action may take the form of (but is not limited to):

- Fines / penalties
- Legal action
- Monetary penalties imposed by the proponent on the contractor
- Withdrawal of license/s, and
- Suspension of work.

The disciplinary action will be determined according to the nature and extent of the transgression/non-compliance, and penalties are to be weighed against the severity of the incident.

## 5 ENVIRONMENTAL AND SOCIAL MANAGEMENT

### 5.1 OBJECTIVES AND TARGETS

Environmental objectives for the project are as follows:

- Zero poaching incidents
- Minimise waste generated
- Minimal interruption to water supply of neighbouring farmers, and
- Protect indigenous flora outside of the fields.

### 5.2 INCIDENT REPORTING

The Contractor must have an accident and incident (including minor or near miss) reporting system that covers all applicable statutory requirements. For any serious incident involving a fatality, or permanent disability, the incident scene must be left untouched until witnessed by a representative of the Police. This requirement does not preclude immediate first aid being administered and the location being made safe.

The contractor must investigate the cause of all work accidents and significant incidents and must provide the client or the client's nominated representative with the results of the investigation and recommendations on how to prevent a recurrence of such incidents. A formal root-cause investigation process should be followed.

## 6 IMPLEMENTATION OF THE EMP

This EMP:

- Has been prepared pursuant to a contract with the proponent
- Has been prepared based on information provided to ECC up to July 2020
- Is for the sole use of the proponent, for the sole purpose of an EMP
- Must not be used (1) by any person other than the proponent or (2) for a purpose other than an EMP, and
- Must not be copied without the prior written permission of ECC.

ECC has prepared the EMP based on information provided by the proponent and the Environmental Scoping Report.