Address: 9 Lords Lane Street, Northview Complex, Bendor park, Polokwane, 0699.
Tel: 086 001 8255, Cell: 073 977 9414, Email: musa@ourbiosphere.co.za, website:www.ourbiosphere.co.za

OURBIOSPHERE ENVIRONMENTAL

DRAFT ENVIRONMENTAL MANAGEMENT PROGRAMME (EMPr) FOR THE CONSTRUCTION OF RETHUSHENG SPECIAL SCHOOL, ON THE REMAINING EXTENT OF FARM CROMFORD 690-LR, BLOUBERG LOCAL MUNICIPALITY, LIMPOPO

Prepared for IDC Architects on behalf of the Limpopo Department of Public Works, Roads and Infrastructure (LDPWR&I).

IDC Architects

OCTOBER 2025

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PREPARED FOR:	**IDC Architects** on behalf of the **Limpopo Department of Public Works, Roads and Infrastructure** (LDPWR&I).
	Contact Person: Matthew Friedland
	Tel: 043 743 0522 / 011 234 8141
	Cell: 072 407 1111
	Email: friedland@idcarchitects.co.za
PREPARED BY:	**Ourbiosphere Environmental (Pty) Ltd**
	Contact Person: Musa Netshivhambe (EAPASA)
	Tel: 086 001 8255
	Cell: 073 977 9414
	Email: musa@ourbiosphere.co.za
	Physical Address:
	9 Lords Lane Street
	Northview Estate
	Bendor Park
	Polokwane
	0699
	Website: www.ourbiosphere.co.za
COMPILED BY:	Musa Netshivhambe REG. EAP (EAPASA)
	EAPASA REG NO: 2019/1853
	Tel: 086 001 8255
	Cell: 073 977 9414
	Email: musa@ourbiosphere.co.za
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PROJECT LOCATION	Mamehlabe Village, Blouberg Local Municipality
PROVINCE	Limpopo

Disclaimer

The material provided to Ourbiosphere Environmental by IDC Architects and the Limpopo Department of Public Works, Roads, and Infrastructure (LDPWR&I) served as the basis for the conclusions presented in this report. This Report's opinions are given in response to a specific request made by IDC Architects. The information provided has been carefully reviewed by Ourbiosphere. Although Ourbiosphere has compared important provided data with expected values, the correctness of the review's findings and conclusions depends only on how accurate and comprehensive the provided data is. Ourbiosphere disclaims all obligation for any inaccuracies or omissions in the material provided, as well as for any resultant consequences from business decisions or activities. The views expressed in this study are applicable to the site's characteristics and conditions as they were at the time of Ourbiosphere's research as well as those that were reasonably foreseeable. Conditions and features that may emerge after the date of this Report, about which Ourbiosphere has neither prior knowledge nor the opportunity to assess, may not be covered by these opinions.

List of Abbreviations

AIP	Alien Invasive Plant
BAR	Basic Assessment Report
CPS	Rethuseng Special School
DEA	Department of Environmental Affairs
DFFE	Department of Forestry, Fisheries and the Environment
DoE	Department of Education
LDPWR&I	Limpopo Department of Public Works, Roads & Infrastructure
DWS	Department of Water and Sanitation
EA	Environmental Authorization
ECO	Environmental Control Officer
EO	Environmental Officer
EIA	Environmental Impact Assessment
EAP	Environmental Assessment Practitioner
LEDET	Limpopo Department of Economic Development, Tourism and Environment
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme
ha	Hectares
HIA	Heritage Impact Assessment
I&APs	Interested and Affected Parties
LIHRA	Limpopo Provincial Heritage Resources Authority
NBA	National Biodiversity Assessment
NEMA	National Environmental Management Act, 1998 (Act No. 107 of 1998)
NEM: AQA	National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004)
NEM: WA	National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008)
NFEPA	National Freshwater Ecosystem Priority Areas
NHRA	National Heritage Resources Act
NWA	National Water Act 1998 (Act No. 36 of 1998)
OSHA	Occupational Health and Safety Act
PPE	Personal Protective Equipment
PIA	Paleontological Impact Assessment
PPP	Public Participation Process

SABS	South African Bureau of Standards
SAHRIS	South African Heritage Resources Information System
SLA	Service Level Agreement
Ourbiosphere	Ourbiosphere Environmental Consulting (Pty) Ltd
WMA	Water Management Area
WUL	Water Use License

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1. Introduction

The proposed construction of Rethuseng Special School is proposed on Remaining Extent of Farm Cromford 690-LR, Blouberg Local Municipality, Capricorn District Municipality, Limpopo (T0LR00000000069000002; **S: 23°33'11.82", E: 28°57'23.19")** which is owned by the Bakone Ba Matlala a Thaba Tribe. Furthermore, the approximate extent of the study area is 16.5 ha of which 10 ha will be utilised as developable areas with the remaining 6.5 ha set aside as open space areas for future development. The objective of the project is to design and construct a school suitable for 330 boarding learners, maximum of 58 boarding staff and 53 daily staff on site. The site will be graded and grassed, and the parking area will be hard surfaced.

The water supply will be from multiple new boreholes that would be drilled in and around site to supplement the water supply. It was recommended that multiple boreholes be developed, each equipped with submersible pumps, and connected to a reticulated system supplying elevated steel storage tanks. This approach is less susceptible to seasonal fluctuations and, with appropriate filtration and chlorination, can provide water of acceptable quality for school use.

The construction of Rethuseng Special School will include the construction of the following:

- boys & girl's dormitories,
- staff residence,
- class rooms,
- laundry,
- medical building,
- assembly hall,
- vocational room,
- care takers rooms,
- parking bays,
- arts and craft centre,
- ablutions,
- dining hall,
- wood and metal centre
- as well as two sports fields.

2.2 Purpose of the EMPr

An Environmental Authorisation (EA) process is currently underway for the proposed construction of Rethuseng Special School. The Draft Environmental Management Programme (EMPr) forms part of the submission of the Draft Basic Assessment Report (BAR) and is in compliance with Appendix 4 of the National Environmental Management Act 107 of 1998 (NEMA) 2014 Environmental Impact Assessment (EIA) Regulations.

The mitigation measures and recommendations identified during the BA process are included in the EMPr, to be disseminated to and used by LDPWR&I employees, IDC Architects and all appointed Engineers and Contractors undertaking any site designs or work on-site. By its very nature, the EMPr is a dynamic document and updating may be required.

The purpose of this EMPr is to ensure that the activities associated with the proposed development are undertaken in a controlled and organised manner, thereby managing and minimising potential environmental impacts during the various phases of the project.

2.3 Objectives of the EMPr include:

- Act as a performance standard that activities can be audited against.
- Describe actions required to achieve management outcomes.
- Ensure that appropriate monitoring and auditing is undertaken.
- Establish impact management outcomes in order to enhance benefits and minimise adverse environmental impacts.
- Outline LDPWR&I's environmental management commitments to the project.
- Outline roles and responsibility required to implement the EMPr.

The LDPWR&I or their appointed Agents is responsible for ensuring adherence to the conditions detailed in the EMPr and the Environmental Authorisation issued by LEDET. The LDPWR&I will be the holder of the EA and will be responsible for the site; however DoE and Rethuseng Special School will be responsible for the operational phase. All personnel undertaking work on site are bound to compliance with the EMPr and must use this document as a guide to minimise and manage environmental impacts.

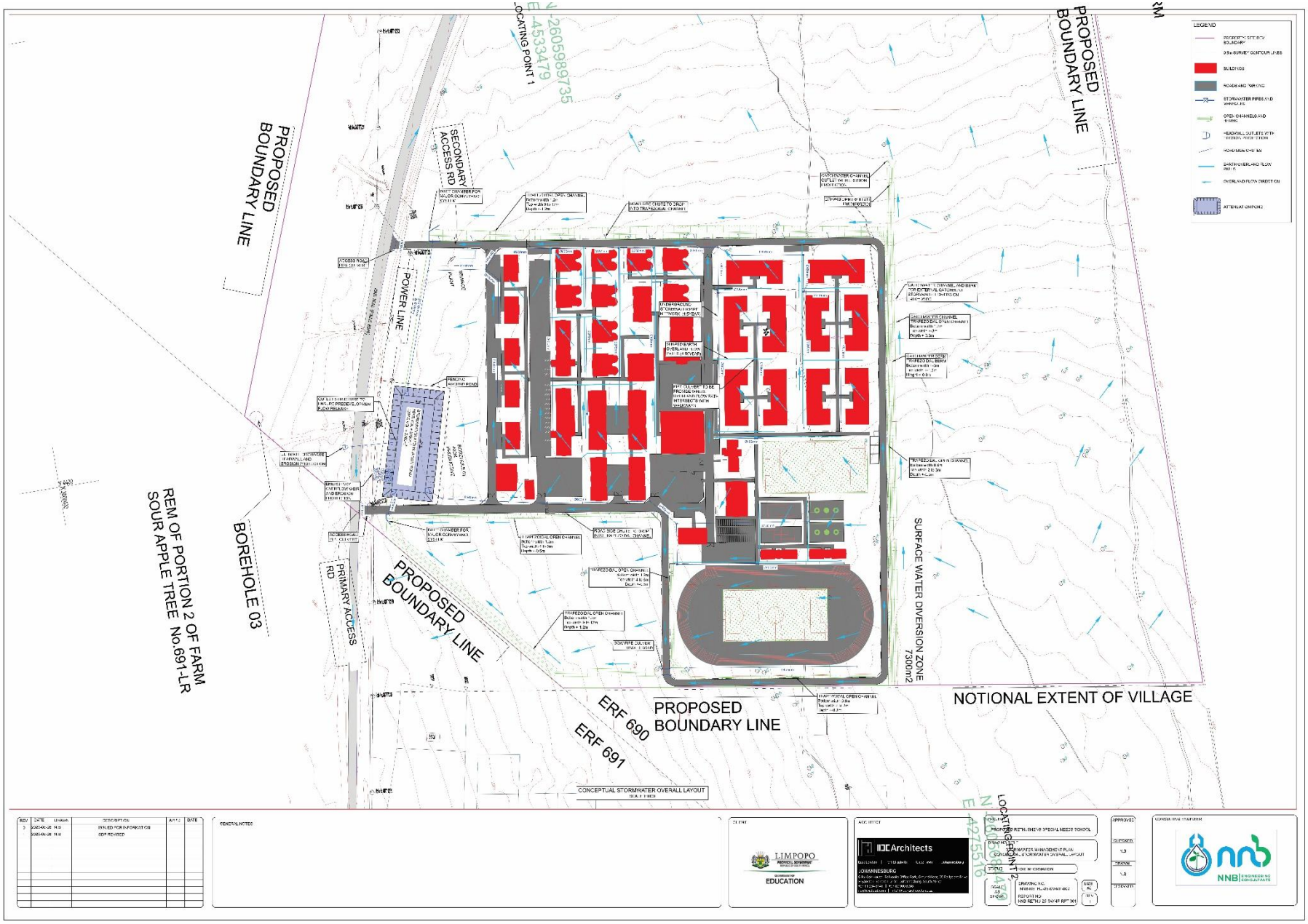

Figure 1-1: Site Development Layout for Rethuseng Special School

3. Report Content

This EMPr has been developed in accordance with and fulfilment of Appendix 4 of the NEMA EIA Regulations (As amended). Refer to **Table 2-1** below which references applicable sections in this document to the information required.

Table 2-1: Content of the EMPr

Content Requirements (Appendix 4 of GN 326, 07 April 2017)	Reference in this Document
(1) An EMPr must comply with section 24N of the Act and include -	
(a) Details of — i) the EAP who prepared the EMPr. ii) the expertise of the EAP to prepare an EMPr, including a curriculum vitae.	Section 3; Appendix A
(b) A detailed description of the aspects of the activity that are covered by the EMPr as identified by the project description.	Section 6; Section 7; Section 9
(c) A map at an appropriate scale which superimposes the proposed activity, its associated structures, and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffers.	Figure 1-1 - Page 3
(d) A description of the impact management outcomes, including management statements, identifying the impacts and risks that need to be avoided, managed and mitigated as identified through the environmental impact assessment process for all phases of the development including - (i) planning and design. (ii) pre-construction activities. (iii) construction activities. iv) rehabilitation of the environment after construction and where applicable post closure. (v) where relevant, operation activities.	Section 9
(e) A description and identification of impact management outcomes required for the aspects contemplated in paragraph (d);	Section 9
(f) A description of proposed impact management actions, identifying the manner in which the impact management outcomes contemplated in paragraph (d) will be achieved, and must, where applicable, include actions to - i) avoid, modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation. ii) comply with any prescribed environmental management standards or practices. iii) comply with any applicable provisions of the Act regarding closure, where applicable. iv) comply with any provisions of the Act regarding financial provision for rehabilitation, where applicable.	Section 9
(g) The method of monitoring the implementation of the impact management actions contemplated in paragraph (f).	Section 10
(h) The frequency of monitoring the implementation of the impact management actions contemplated in paragraph (f).	Section 10
(i) An indication of the persons who will be responsible for the implementation of the impact management actions.	Section 8

(j) The time periods within which the impact management actions contemplated in paragraph (f) must be implemented.	Section 9; Section 10; Section 11
(k) The mechanism for monitoring compliance with the impact management actions contemplated in paragraph (f).	Section 10

Content Requirements (Appendix 4 of GN 326, 07 April 2017)	Reference in this Document
(l) A program for reporting on compliance, taking into account the requirements as prescribed by the Regulations.	Section 10
m) An environmental awareness plan describing the manner in which - i) the applicant intends to inform his or her employees of any environmental risk which may result from their work. ii) risks must be dealt with in order to avoid pollution or the degradation of the environment.	Section 11
(n) any specific information that may be required by the competent authority.	This will be addressed, if required, when the Environmental Authorisation is (EA) is issued.
2) Where a government notice gazetted by the Minister provides for a generic EMPr, such generic EMPr as indicated in such notice will apply.	Section 12

4. The Environmental Assessment Practitioner

Operating out of four established locations across four provinces, Ourbiosphere Environmental Consulting (Pty) Ltd employs twelve (12) professionals. Knowledge in a variety of environmental fields is provided by Ourbiosphere. Since 2011, Ourbiosphere's has operated in South Africa and has a stellar record of overseeing significant environmental initiatives. With strict quality assurance guidelines, Ourbiosphere aims to become ISO 9001 certified.

The qualifications and experience of the environmental practitioners responsible for this project are provided in **Table 3-1**.

Table 3-1: Ourbiosphere Team involved with the BA Process

Name	Qualification	Years of Experience
Mr. Musa Netshivhambe ***Reg EAP (EAPASA) 2019/1853*** ***Certificated Environmental Scientist (SACNASP)***	BEnvM - (Bachelor of Environmental Management – (Univen 2003); MEnvSc - Master of Environmental Sciences (Univen -2007); National Diploma – Safety Management (Unisa - 2024)	22 Years
Dr. Mr. Walter Maphangwa	BEnvM - (Bachelor of Environmental Management – (Univen 2007); Masters in Science (University of Western Cape -2011);	18 Years

	Doctor of Philosophy (Unisa)	
Ms. Linky Tseka	BA. Environmental Management (Unisa – 2019)	1 Year

4 Legislative Requirements

4.1 Legal Requirements of the EMPr

Appendix 4 of the NEMA 2014 EIA Regulations (as amended in 2017) sets out the minimum requirements for the development of an EMPr. This EMPr has been developed in fulfilment of these requirements for the construction and operational phases of the construction of to Rethuseng Special School.

The implementation of an EMPr for the proposed activity is a requirement of the EA and the provisions for Duty of Care and remediation of environmental damage contained in Section 28 of the NEMA. As such, failure to comply with this EMPr will constitute an offence and LDPWR&I and/or their Contractor may be liable for penalties and/or legal action. Therefore, it is important for all the responsible parties to understand their duties and undertake them with duty and care.

This EMPr, which should form an integral part of the contract documents, informs the Contractor as to his duties in the fulfilment of the project objectives, with particular reference to the prevention and mitigation of environmental impacts caused by construction activities associated with the project. The Contractor should note that obligations imposed by the EMPr are legally binding in terms of environmental statutory legislation. Further, the EMPr is enforceable through additional conditions to the general conditions of contract that pertain to this project. LDPWR&I must sign the declaration of acceptance of the EMPr, included at the end of this document.

It is expected that LDPWR&I and its Contractors are conversant with all legislation pertaining to the environment, including provincial and local government ordinances, which may be applicable to the contract. Should LDPWR&I be of the opinion that the contractor is not familiar with the implementation of an EMPr or key environmental legal requirements, it should request the Environmental Control Officer (ECO) provide applicable training to the contractor.

All prospective contractors must sign the declaration of acceptance of the EMPr, included at the end of this document.

4.2 Other Applicable Environmental Legislation

The following is a list of key additional legislation, policies and/or guidelines of relevant spheres of government that may be applicable to this application:

- Constitution of the Republic of South Africa (Act No. 108 of 1996).
- Environmental Conservation Act (Act No. 73 of 1989) (ECA).
- Limopopo Environmental Management Act (Act 7 of 2003)
- Hazardous Substances Act (Act No. 15 of 1973).
- Municipal by-laws.
- National Environmental Management: Air Quality Act (Act No. 39 of 2004) (NEM: AQA).
- National Environmental Management: Biodiversity Act (Act No. 10 of 2004) (NEM: BA).
- National Environmental Management: Protected Areas Act (Act No. 57 of 2003) (NEM: PAA).
- National Environmental Management: Waste Act (Act No. 59 of 2008) (NEM: WA).
- National Heritage Resources Act (Act No. 25 of 1999) (NHRA).
- National Spatial Biodiversity Assessment (NSBA).
- National Water Act (Act 36 of 1998) (NWA).
- Occupational Health & Safety Act, 1993 (Act No. 85 of 1993).
- SANS 10103 (Noise Regulations).

4.2 Assumptions and Uncertainties

- This document constitutes the Final EMPr for the construction and operation of Rethuseng Special School. The EMPr can only be finalised on the issue of the Environment Authorisation (EA) and is subject to approval by the LEDET.
- All the technical data and information provided by LDPWR&I, LDPWR&I and their appointed consultants to Ourbiosphere Consulting are accurate and up to date.
- LDPWR&I, LDPWR&I and its appointed Agents will implement the measures contained in the Final EMPr, as approved by LEDET.
- A monitoring and evaluation system, including auditing, will be established to track the implementation of the approved Final EMPr to ensure that management measures are effective to avoid, minimise and mitigate impacts; and corrective action is undertaken to address shortcomings and/or non-conformances.
- LDPWR&I, LDPWR&I and its consultants will adopt a process of continual improvement when managing and/or mitigating negative environmental impacts arising from the project. The approved Final EMPr will be used as the basis of environmental management and will be improved and refined regularly.
- Although the listed activities triggered by this project relate only to the construction phase i.e. clearance of indigenous vegetation, potential operational impacts have been identified and as such operational mitigation measures are included in this EMPr.

5 NEMA EIA Listed Activities

NEMA provides for the management and protection of environmental resources through *inter alia* the imposition of Environmental Authorisation requirements.

The EIA Regulations, 2014 (as amended), promulgated in terms of NEMA, consist of the following:

- Government Notice (GN) 326, which specifies the EIA procedures to be followed.
- GN 327, which provides Listing Notice 1 – activities that require a BA process.
- GN 325, which provides Listing Notice 2 – activities that require a Scoping an Environmental Impact Reporting (S&EIR) process.
- GN 324, which provides Listing Notice 3 – activities in identified geographical areas that require a BA process.
- The proposed construction Rethuseng Special School will trigger two (2) listed activities - one (1) GN 327 and one (1) GN 324. The applicable Listed Activities are detailed in Table 6-1.

Table 6-1: NEMA EIA Listed Activities

No.	Activity description	Applicability to proposed project
NEMA EIA Listing Notice 1 (GN 327) – BA process required		
27	The clearance of an area of 1 ha or more, but less than 20 ha of indigenous vegetation, except where such clearance of indigenous vegetation is required for- (i) the undertaking of linear activity; or (i) maintenance purposes undertaken in accordance with a maintenance management plan	BiAssets conducted an Ecological Specialist Verification to confirm whether the vegetation on site was considered indigenous, the findings of their assessment confirmed the site comprises of the following: 10 ha of Transformed Habitat 6.5 ha of Grassland Habitat The Grassland Habitat was found to be heavily degraded and species poor but supports indigenous vegetation.

		This listed activity is applicable as more than 1 ha of indigenous vegetation will be cleared for the site development.
NEMA EIA Listing Notice 3 (GN 324) – BA process required		
12	The clearance of an area of more than 300m2 or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan	This listed activity is applicable as the site will be cleared of more than 300m2 of indigenous vegetation and is located within the EN Income Sandy Grassland ecosystem.

6 Specialist Studies

The following specialist studies were undertaken to determine the potential impact of the project on the surrounding environment:

- Ecological Impact Specialist
- Geotechnical.
- Social Facilitation
- Floodline
- Geohydrological
- Traffic
- Heritage
- Stormwater

These specialist studies were used to identify and rank impacts and to ascertain the mitigation measures/action items as detailed in **Section 9** of this EMPr. Refer to the Draft BA report for the specialist information and copies of the reports.

7 Roles and Responsibilities

The successful implementation of this EMPr requires co-operation between Rethuseng Special School, LDPWR&I, IDC Architects, the onsite Environmental Officer (EO), the appointed ECO and DoE.

General roles and responsibilities have been outlined in **Table 8-1** and the project team will be required to comply with the conditions defined herein.

In terms of employment of labour, contractors will be expected to maximise the employment of individuals with the required skills residing within local area or adjacent residential areas. The EMPr must be updated accordingly should the roles and responsibilities of the responsible agents change or should there be changes to the management structure of Rethuseng Special School requiring changes to the responsible agents.

Table 8-1: Roles and Responsibilities

Responsible Agent	Role / Responsibility
LDPWR&I's - Engineer's Representative / Project Manager (PM)	▪ Appoint an independent ECO to monitor *the* implementation of the EMPr, during construction. ▪ Appoint appropriately qualified contractors to co-ordinate, supervise and expedite different tasks. ▪ Ensure all staff, sub-contractors, suppliers, etc. are familiar with and understand the EMPr (including revisions), and all agreed Method Statements. ▪ Ensure compliance with the contract and legislative environmental requirements. Including the issuing of contract notices for non-compliance with this EMPr. ▪ Ensure that all environmental protection procedures defined in this EMPr are being adhered to. ▪ Maintain overall responsibility and accountability for the site during the construction phase. ▪ Maintain overall responsibility for ensuring that the functions defined in the EMPr are carried out effectively. ▪ Notify the LEDET and Interested and Affected Parties (I&APs) of commencement of construction and appointment of ECO.
Contractor	▪ Ensure adherence to environmental laws and standards relevant to the construction of the project. ▪ Ensure all mitigation measures outlined in this EMPr are properly and competently directed, guided and executed during construction. ▪ Ensure all personnel are fully aware of all environmental issues relating to construction activities being undertaken on site and the related precautions that need to be taken. ▪ Ensure that the construction complies with this EMPr. ▪ Keep a copy of the EMPr on site during construction.
ECO	▪ Based on the proposed work, identify any environmental approvals that are required prior to construction commencing. ▪ Conduct a site visit prior to the start of construction to record the environmental baseline and the condition of the area prior to the start of construction.

Responsible Agent	Role / Responsibility
	▪ Advise the PM on actions or issues impacting on the environment and provide appropriate recommendations to address and rectify these matters. ▪ Assess the suitability and/or effectiveness of this EMPr on an on-going basis, in liaison with the Contractor/s and the PM. Make recommendations accordingly. ▪ Compilation of audit report / reporting on the compliance of the contractors and submission to the PM, the relevant authority as well as making the report available to I&APs as per EA conditions. ▪ Conduct environmental induction of all contractors and material suppliers prior to the commencement of construction work. ▪ Immediately report any serious environmental non-compliance to the PM and the Relevant Authority and give instruction to the contractor and/or engineer to cease activity, avoid/minimise damage, or rehabilitate environmental damage. ▪ Monitoring environmental compliance of all contractors within the project area with the provisions of - and in accordance with - the EMPr and Section 28 of the National Environmental Management Act. ▪ Order the Contractor to suspend part or all of the works if the Contractor and/or any sub-contractors, suppliers, etc. fail to comply with any aspect of this EMPr. ▪ Record and provide written documentation of non-conformances with this EMPr that require LDPWR&I or its Contractor/s to implement corrective action. ▪ Review preventative and corrective actions to ensure implementation of recommendations made from audits and site inspections. ▪ Undertake monthly site visits (or as per the requirements of the LEDET in the EA), and record key findings. This includes monitoring of the construction site and an evaluation of the implementation, effectiveness and level of compliance of on-site construction activities with this EMPr, the EA and associated plans and procedures.
Environmental Officer (EO)	▪ Advise the PM and contractors on actions or issues impacting on the environment and provide appropriate recommendations to address and rectify these matters. ▪ Assess the suitability and/or effectiveness of this EMPr on an on-going basis, in liaison with the PM and make recommendations accordingly. ▪ Ensure all contractors have copies of the EMPr (including revisions) and all agreed Method Statements. ▪ Ensure all site personnel working on site have had training on the EMPr. ▪ Ensure compliance with the legislative environmental requirements. ▪ Ensure that a copy of the EMPr and all agreed Method Statements and a layout plan are available on-site. ▪ Identify possible areas of improvement in the execution of the extension from an environmental perspective. ▪ Liaise with LEDET, DWS, and I&APs if required. ▪ Monitor compliance with procedures of the EMPr. ▪ Order any site personnel to suspend part or all of the works if that person and/or fail to comply with any aspect of this EMPr. ▪ Undertake the evaluation of the implementation, effectiveness and level of compliance of on-site activities with this EMPr and associated plans and procedures.
DoE & Rethuseng Special School (Operational Activities)	▪ Ensure all personnel (staff and students) are fully aware of all environmental issues relating to operational activities being undertaken on site and the related precautions that need to be taken. ▪ Maintain responsibility for ensuring that the functions defined in the EMPr are carried out effectively.

Responsible Agent	Role / Responsibility
	▪ Alien invasive species control. ▪ Appoint appropriately qualified contractors to co-ordinate, supervise and expedite different tasks. ▪ Educating learners on the faunal species occurring within the area, such as arachnids and reptiles. ▪ Ensure all mitigation measures outlined in this EMPr are properly and competently directed, guided and executed during the operational phase such as: ▪ Implementation of a waste management procedure. ▪ Maintain overall responsibility and accountability for the site during the operational phase. ▪ Maintenance and upkeep of the facilities. ▪ Maintenance of the borehole pump. ▪ Stormwater drain management (keep it clean from debris). ▪ Water Quality Testing.

8 Impact Management Objectives and Outcomes

The EMPr provided in this document outlines the mitigation measures identified for the planned development, assigns responsibility for carrying out the mitigation actions, and lists the probable consequences (as identified and outlined in the Draftl BAR). The next subsections provide a full description of all the activities that need to be controlled, mitigated, and management mechanisms put in place, as well as the accountable people or organizations that need to carry them out. The foundation of this EMPr is this information, which must always be followed. The following subsections may be changed as needed on a regular basis.

8.1 Impacts and Outcomes

The environmental aspects associated with the construction of Rethuseng Special School and the interaction of the proposed activities with the baseline environment, can result in a change to the environment (i.e. an environmental impact).

As detailed in the Draft BAR, there are potential negative impacts that may arise during the construction, and operational phase of the project.

For the purpose of this EMPr, general environmental aspects anticipated to require management during the construction and operational activities, are provided in Table 9-1. For each general environmental management aspect identified, potential negative impacts and desired post-mitigation outcomes, are also provided. Refer to **Table 9-2** and **Table 9-3** for the management actions required.

Table 9-1: Aspect Impacts and Outcomes

Objective	Aspect	Potential Impacts	Intended Outcomes
Protect Remaining Faunal and Floral Resources	Biodiversity	The potential biodiversity impacts include: Loss of indigenous vegetation. Loss of faunal species of special concern (SCC). Further habitat degradation.	Ensure that the remaining biodiversity resources remain undisturbed by construction related activities. Ensure the clearance of vegetation is restricted to the site development footprint and does not extend outside the site boundary.
Protect any Heritage Resources that may be unearthed	Heritage	The potential heritage impacts include: Loss Heritage and paleontological resources that are greater than 60 years (protected under SAHRA).	If heritage and paleontological resources are unearthed during the construction phase, the relevant authorities need to be alerted i.e., (LIHRA) and the "Chance Find Protocol" be implemented. The Chance Find Protocol states that *"if any artefacts and/or fossils are noted then it needs to be reported to the Environmental Control Officer (ECO) who will then inform LIHRA and the Heritage Specialist".*
Manage Excessive Nuisance Considerations	Noise	The potential noise impacts include: Noise impact resulting in nuisance on nearby sensitive receptors (existing school, residents and businesses). Noise levels in the study area are currently generated mostly by vehicular traffic. As the school is already in existence no additional noise is considered after the construction of the school, barring from athletic and sports events that may occur from time to time.	Ensure that noise levels do not cause a nuisance to nearby receptors and that construction is restricted to designated working hours as stipulated by Blouberg Local Municipality. Noise levels are to be kept within the legislated limits for the area. Following requirements of the relevant national and local noise control statues.

Manage Traffic Volumes	Traffic	The potential traffic impacts include: Increase in traffic during the construction and operational phases.	Traffic Management Plan must be developed for the proposed project that must address the accommodation of traffic onsite during the construction and operational phase.
Reduce risks to employees, staff and student's health and safety.	Health and Safety	The potential health and safety impacts include: Injury, ill health or loss of life. Danger to the existing pupils at Rethuseng Special School due to construction and operational activities. Contaminated sources of external water supply (JoJo tanks and boreholes).	Ensure that health and safety requirements are implemented as per the Occupational Health and Safety Act (OSHA) to ultimately ensure the safety of personnel. Only construction personnel are to be allowed within the site. All open excavations and trenches must be demarcated with snow netting and the appropriate warning signage must be in place. Strict measures must be put in place to ensure learner safety during the construction and operational phases. These include proper

Objective	Aspect	Potential Impacts	Intended Outcomes
			management, maintenance and frequent testing of external water supply sources that is used for human consumption. The learners must be educated on the dangerous faunal species occurring within the study area such as scorpions and snakes and what must be done in the event that they are encountered, so that the required specialists are called to remove and relocate these species.
Manage surface groundwater	Surface and Groundwater	The potential groundwater impacts include: Contamination of groundwater resources by mismanagement and incorrect handling of hazardous	Ensure that spillages of fuels, oils and other potentially harmful chemicals must be cleaned up immediately and contaminants properly drained and disposed of using proper solid/hazardous waste

impacts		substances (cement, oil and lubricants)	facilities (not to be disposed of within the natural environment).
Manage waste	Waste	The potential waste management impacts include: Contamination of soil and/or water. Litter, odour and visual impacts.	Responsible management of different waste streams produced on site.

a) Objectives and Actions

The EMPr presented in this document lists the potential impacts (as identified and detailed in the *Draft* BAR) and details mitigation measures identified for the proposed development and delegates responsibilities for implementation of the mitigation activities.

All activities to be managed, mitigated and management measures to be implemented, and the responsible individuals/organisations who should implement these measures, are detailed in the subsections which follow. This information is the core of this EMPr and should be always adhered to. The subsections which follow may be periodically updated as necessary.

Table 9-2: Objective and mitigation action table for the construction phase

Objective	Action	Timeframe	Implementation	Monitoring
1) General construction	a) An Environmental File must be maintained and kept on site and must include: Environmental Authorisation. The Approved EMPr. The Environmental Site Plan. Contractor Method Statements. Audit checklists and reports (both from the EO and the ECO). Waste disposal records. Environmental awareness training records. Complaints register. Environmental incident register.	Prior to commencement of construction and ongoing during construction	Contractor/PM	ECO/EO
2) Planning Requirements	*a) Building plans must be submitted to the SED: Development Planning and Human Settlements for approval prior to construction.*	*Prior to commencement of construction*	*LDPWR&I/PM*	*ECO/EO*
3) Reduce risks to employee health and safety	a) Develop a Health and Safety Plan in accordance with the Occupational Health and Safety Act (OSHA).	Prior to commencement of construction	Contractor/PM	ECO/EO

	b) Train all contractors on the Health and Safety Plan.	Prior to commencement of construction and ongoing during construction	PM	ECO

Objective	Action	Timeframe	Implementation	Monitoring
	c) Appropriate PPE must be worn/used and maintained at all times in designated areas and for activities as required.	Prior to commencement of construction and ongoing during construction	PM	ECO/EO
	d) The construction and storage areas must be demarcated to control the access of unauthorised persons to the construction areas.	Prior to commencement of construction	PM	ECO/EO
	e) The school must be cordoned off from the construction areas so as to avoid any injuries or worse fatalities due to negligence.	During construction	Contractor	ECO/EO
	f) Separate entry and exit points for the contractors independent from the school must be implemented to minimise the risk of possible incidents.	During construction	Contractor	ECO/EO
	g) Flagmen must be stationed at high volume areas to marshal incoming and outgoing traffic.	During construction	Contractor	ECO/EO
	h) Onsite security must ensure that no school learner access the active construction site under any circumstances.	During construction	Contractor	ECO/EO
	i) A layout plan for the delivery of equipment and loading areas must be developed and implemented.	During construction	Contractor	ECO/EO

4) Reduce dust	a) During high wind and dusty conditions, the use of dust suppression equipment must be considered such as water carts.	During construction	Contractor	ECO/EO
	b) A dust management plan must be developed and implemented for the construction activities.	Prior to commencement of construction	PM	ECO/EO

Objective	Action	Timeframe	Implementation	Monitoring
	c) Vehicle speed onsite must be limited to <20km/h to minimise dust liberation into the surrounding environment and affecting nearby residents and businesses.	During construction	Contractor	ECO/EO
	d) Handling of material that has the potential to generate dust should be kept to a minimum, such as concrete or cement.	During construction	Contractor	ECO/EO
5) Manage noise	a) Adjacent landowners or tenants must be kept informed of the need and extent of noisy disruptions.	Throughout construction	Contractor/PM	ECO/EO
	b) Construction activities will be operated between 08h00am - 16h00pm to reduce impacts on the neighbouring facilities and to ensure that noise emissions will be minimised. In addition, should LDPWR&I request the contractors to work outside of those specified timeframes, the contractors will notify the surrounding landowners.	Throughout construction	Contractor/PM	ECO/EO
	c) Noise levels are to be kept within the legislated limits for the area. Following requirements of the relevant national and local noise control statues.	Throughout construction	Contractor/PM	ECO/EO

6) Manage waste	a) Develop a waste management plan for the construction and operational phases of the project	Prior to construction	PM/ Contractor/ Rethuseng Special School	ECO/EO
	b) The fire pit which was previously used on site must be removed and all residual waste must be disposed of appropriately by a reputable service provider.	Prior to construction	PM/Contractor	ECO/EO
	c) Designated skips must be provided in a designated area for general and hazardous waste, respectively, which must be covered to avoid rainwater entering the skip.	Throughout construction	Contractor	ECO/EO

Objective	**Action**	**Timeframe**	**Implementation**	**Monitoring**
	d) Waste must be segregated and labelled according to the waste type (general/hazardous).	Throughout construction	Contractor	ECO/EO
	e) Ensure daily site clean-ups to prevent the build-up of litter and/or rubble.	Throughout construction	Contractor	ECO/EO
	f) No dumping of litter, rubble or cleared vegetation on site should be allowed. If construction material is to be discarded, it should be disposed of at an appropriate registered dump site away from the development footprint. No temporary dump sites should be allowed in areas with natural vegetation.	Throughout construction	Contractor	ECO
	g) Proof of safe disposal of waste must be collected on disposal of the waste and retained as proof.	Throughout construction	PM/ Contractor	ECO/EO

	h) All contractors must be trained on how waste must be managed and what to do in the event of a spill.	Throughout construction	PM/ Contractor	ECO/EO
	i) A Service Level Agreement (SLA) between the DoE and Blouberg Local Municipality is required to be put in place which specifically addresses the waste management and collection, should the SLA not be achievable then the DoE must make provisions for waste to be collected and disposed of at registered landfill site.	*Prior to construction*	*LDPWR&I/DoE/PM*	*ECO/EO*
') Manage the storage and handling of hazardous substances	) Hazardous substances must be stored and handled in accordance with the appropriate legislation and standards, which include the Hazardous Substances Act No. 15 of 1973, the Occupational Health and Safety Act No. 85 of 1993, relevant associated Regulations, and applicable SANS and international standards.	Throughout construction	Contractor	ECO/EO

Objective	**Action**	**Timeframe**	**Implementation**	**Monitoring**
	a) A register of all hazardous substances stored on site must be maintained.	Throughout construction	Contractor	ECO/EO
	b) Material Safety Data Sheets (MSDS), which contain the necessary information pertaining to a specific hazardous substance, must be present for all hazardous materials stored on the site.	Throughout construction	Contractor	ECO/EO
	c) Storage and use of hazardous materials will be strictly monitored and must adhere to the requirements stipulated on the MSDS.	Throughout construction	Contractor	ECO/EO

	e) Should any asbestos containing materials (ACMs) be found when the prefabricated containers are removed, needs to be disposed of in an appropriate manner by a qualified waste service provider.	Throughout construction	PM/Contractor	ECO/EO
	f) Any hazardous materials (apart from fuel) must be stored within a lockable store with a sealed floor. Storage and use of hazardous material will be strictly monitored and must adhere to the requirements stipulated on the MSDS.	Throughout construction	Contractor	ECO/EO
8) Manage surface water and groundwater - impacts	a) Good housekeeping practices are to be implemented during the construction phase. Any sources of pollution must immediately be contained, and affected areas remediated upon occurrence. Suitable management procedures should be put in place to contain and appropriately manage any pollution incident.	Throughout construction	PM/EO	ECO
	b) A temporary Stormwater Management Plan must be designed and implemented during the construction phase.	Throughout construction	PM/EO	ECO

Objective	Action	Timeframe	Implementation	Monitoring
	a) Vegetation clearing must be undertaken in a phased approach in order to reduce the risk of erosion and downstream flooding.	Throughout construction	PM/Contractor	ECO
	b) Careful design and management of stormwater must take place to ensure that changes in pattern flow and timing of water in the landscape are minimised and kept as near to the pre-development conditions as possible.	Throughout construction	Contractor	ECO/EO

	e) A spill kit should be kept on site and all site personnel should be trained on how to use it.	Throughout construction	Contractor	ECO/EO
	f) Vehicles and machinery are to be checked and maintained on a regular basis.	Throughout construction	Contractor	ECO/EO
	g) Suitable ablutions facilities must be established on site for construction workers, and the design of the ablution facilities must ensure that effluent generated does not impact surface water runoff leaving the site. These ablutions must be cleaned regularly, and waybills placed in the environmental file.	Throughout construction	Contractor	ECO/EO
	h) Construction vehicles, refuelling bowsers and any fuel storage and handling areas established on site during the construction work must be fit for purpose and properly designed to limit spills and leaks (or enable the containment of leaks or spills that do occur). These must be regularly inspected for leaks and drip trays are to be placed under trucks to intercept leaks.	Throughout construction	Contractor	ECO/EO

Objective	Action	Timeframe	Implementation	Monitoring
	▪ Any *significant spillages of chemicals and/or fuels must* be reported to the Department of Water and Sanitation (DWS) *and other relevant authorities* and in the event of a spill the following steps must be undertaken: o Stop the source of the spill. o Contain the spill. o Report the spill to the DWS and other relevant authorities. o Remove the spill for treatment or authorised disposal. o Determine whether there is any soil, groundwater or other environmental impact. o *If necessary, remedial action must be taken in consultation with DWS and the Department of Forestry, Fisheries and the Environment (DFFE).* o The incident must be documented. All significant spills will also be managed in accordance with Section 30 of NEMA.	Throughout construction	Contractor	ECO/EO
	j) *Ensure that spillages of fuels, oils and other potentially harmful chemicals must be cleaned up immediately and contaminants are properly drained and disposed of using permitted solid/hazardous waste facilities (not to be disposed of within the natural environment).*	*Throughout construction*	*Contractor*	*ECO/EO*
	k) Any hydrocarbon or cement powder spills must be disposed of as hazardous waste and not be allowed to enter the surface water runoff.	Throughout construction	Contractor	ECO/EO

Objective	Action	Timeframe	Implementation	Monitoring
	l) Any cement mixed on site must be mixed in water containers or on top of impermeable membranes, and a plan must be put in place to ensure that washing and cleaning of dirty equipment and tools does not result in impacted surface water runoff.	Throughout construction	Contractor	ECO/EO
9) Fauna and Flora	a) Construction related activities must be restricted to the site development footprint. Under no circumstances are activities allowed to occur outside this footprint.	Throughout construction	Contractor	ECO/EO
	b) Clearing of vegetation must take place in a phased manner. This will allow for any remaining faunal species within the study area to flee and avoid harm.	Throughout construction	Contractor	ECO
	c) Smaller species that are not as readily able to move out of an area ahead of ground clearing activities such as scorpions and reptiles will be less mobile during rainfall events and cold days (winter). As such should any of these species be observed during clearing and construction activities, they must be carefully and safely moved to an area of similar habitat outside of the disturbance footprint.	Throughout construction	Contractor	ECO/EO
	) Smaller scorpion species and harmless reptiles (that are likely present within the study area) must be carefully relocated by suitably nominated construction personnel. For larger venomous snakes, a suitably trained specialist must be contacted to carry out the relocation of the species, should it not move off on its own.	Throughout construction	Contractor	ECO/EO

Objective	Action	Timeframe	Implementation	Monitoring
	e) Alien invasive species control must occur throughout the life of the project. Specific mention in this regard is made of listed invasive species as per the NEMBA Alien species lists, 2020, in line with the NEMBA Alien and Invasive Species Regulations (2020). All cleared plant material must be disposed of at a licensed waste facility which complies with legal standards, or a garden refuse site.	Throughout construction and operation	PM/DoE/Rethuseng Special School	ECO
	f) Edge effects arising from proposed activities, such as soil compaction, erosion and/or stormwater must be adequately managed.	Throughout construction	Contractor	ECO/EO
	g) Edge effect control needs to be implemented to prevent further degradation of habitat outside of the proposed disturbance footprint.	Throughout construction	Contractor	ECO/EO
10) Cultural Heritage	a) As per the requirements of the National Heritage Resources Act, should any archaeological material be unearthed during construction of the development, all activities are to be halted, LIHRA alerted of the situation and the "Chance Find Protocol" must be applied. The Chance Find Protocol states that "*if any artefacts and/or fossils are noted then it needs to be reported to the Environmental Control Officer (ECO) who will then inform LIHRA and the Heritage Specialist*".	Throughout construction	Contractor/ECO	ECO
	▪ The construction teams should be made aware that archaeological material (e.g. pottery, graves, remains of dwellings, etc.) that often occur underground during earthworks.	Throughout construction	Contractor	ECO/EO

11) Hydrogeological	b) A WUL needs to be issued by the Department of Water and Sanitation (DWS) prior to the utilisation of the borehole.	Throughout construction and operation	PM	ECO/EO

Objective	Action	Timeframe	Implementation	Monitoring
	c) For the use of the borehole, it is recommended to install a pump that will be able to yield the 24-hour recommended abstraction yield. If a higher yielding pump is installed for the shorter duty cycles, it is important to ensure that recommended operation time is adhered to.	Throughout construction	Contractor	ECO
	d) To ensure that the aquifer is protected from over abstraction and permanent damage, it was recommended that a "pump/power cut of switch" be installed at the "dynamic water level" depth associated with the recommended yield where electrical pumps are used.	Throughout construction	Contractor	ECO/EO
12) Traffic	a) Traffic management plan for the project must be developed, documented and approved by the PM. The plan must address accommodation of all traffic on site i.e., site vehicles, delivery vehicles, construction plant and visitors' vehicles.	Throughout construction	Contractor/PM	ECO/EO
	b) Traffic management plan for the site must address all areas of the works and must be constantly reviewed with activities to ensure effectiveness. Workstations to be demarcated with delineators that are at least 5 meters apart.	Throughout construction	Contractor	ECO/EO
	c) Traffic routes must be clearly defined, all hazards /form of obstructions must be identified and controlled on the site roads to ensure safety for all intended traffic on site.	Throughout construction	Contractor	ECO

	d) Strict measures must be put in place by LDPWR&I and IDC Architects to ensure the safety of the school learners.	Throughout construction	PM/Contractor	ECO
	e) Speed to be maintained at 20km inside the site boundary	Throughout construction	Contractor	ECO/EO
	f) At workstations, traffic must be controlled through installation of signs and provision flagman.	Throughout construction	Contractor	ECO

Objective	Action	Timeframe	Implementation	Monitoring
	g) Traffic safety warning signs and speed control signs must be adequately displayed.	Throughout construction	Contractor	ECO/EO

Table 9-3: Objective and mitigation action plan for the operational phase

Objective	Action	Timeframe	Implementation	Monitoring
1) Rehabilitation activities	a) Revegetating laydown and stockpile areas as soon as possible after construction activities are complete. Indigenous and non-invasive species must be used in this regard.	Once-off	PM/Contractor	ECO
	b) If envisioned, formal landscaped gardens must make use of indigenous species or ornamental alien species that are not listed within the NEMBA Alien Species List (2020).	Once-off	PM/Contractor/ DoE/Rethuseng Special School	ECO
	c) Creation of rock gardens, using dead logs and fallen trees in landscape areas should be considered, as these will provide areas of niche habitat and refuge for small faunal species. Trees can be planted to provide nesting and roosting sites for avifauna.	Throughout operational phase	PM/DoE/Rethuseng Special School	ECO
	d) Limit impact footprint to what is absolutely necessary.	Throughout operational phase	PM/DoE/Rethuseng Special School	ECO
	e) From a floral perspective, no trigger species or species of conservation concern are associated with the study area and a walkdown to mark such species for relocation purposes is not required.	Throughout operational phase	PM	ECO
	f) Edge effect control needs to be implemented to prevent further degradation of habitat outside of the proposed disturbance footprint area.	Throughout operational phase	PM	ECO

2) Manage waste	a) All staff must ensure they are familiar with Rethuseng Special Schools waste management procedure.	Throughout operational phase	DoE/Rethuseng Special School	ECO

Objective	Action	Timeframe	Implementation	Monitoring
	b) Waste must be stored in terms of the Norms and Standards for the storage of waste as per the NEM: WA. As a minimum, storage areas must be levelled and hardstanding, skip integrity must be checked and skips must be protected from natural elements. The area must be situated away from learners and access must be restricted to authorised personnel only.	Throughout operational phase	PM/DoE/Rethuseng Special School	ECO
	c) LDPWR&I must request waste manifests / proof of disposal from the waste contractor and undertake periodic audits on the waste contractor.	Throughout operational phase	PM	ECO
3) Manage surface and groundwater impacts	a) Regular maintenance and repairs must be undertaking on the ablutions and associated infrastructure as and when required.	Throughout operational phase	PM	ECO
	b) A WUL needs to be issued by the Department of Water and Sanitation (DWS) prior to the utilisation of the borehole.	Throughout construction and operation	PM	ECO/EO
	c) The bacteriological content of the borehole water will require treatment as the results showed an acute risk for human consumption and chlorination of the water will be required to ensure that no bacteriological growth takes place. It is therefore also recommended to undertake water quality monitoring of the water on a quarterly basis.	Throughout operational phase	PM/DoE/Rethuseng Special School	ECO

	) Monitoring of the groundwater level is also recommended, and if a downward trend of the groundwater level is found (due to droughts or influences of neighbouring groundwater abstraction), mitigation measures, such as re-evaluating the pump yield of duty cycle, can be put in place.	Throughout operational phase	PM/DoE/Rethusen g Special School	ECO

Objective	Action	Timeframe	Implementation	Monitoring
	e) Monitoring of the pump yield - by means of a flow meter - should also be undertaken to ensure that no over pumping takes place and to protect the aquifer from permanent damage. It is recommended to sample the groundwater biannually to monitor the water quality is still fit for human consumption.	Throughout operational phase	PM/DoE/Rethusen g Special School	ECO
	f) The borehole must be sampled and analysed again for bacteria to ensure appropriate treatment prior to equipping the borehole for use.	Throughout operational phase	PM/DoE/Rethusen g Special School	ECO
	g) The hydrological assessment tested the borehole in terms of SANS drinking water standards and not for other contaminants such as volatile organic compounds (VOCs) which could arise in the soils and groundwater due to use of pesticides and other activities that could have been undertaken in the surrounding areas. As such, to ensure that the borehole water is safe for human consumption prior to use water quality monitoring testing for other contaminants should be undertaken. The suite of analysis should be advised by a Hydrologist.	Throughout operational phase	PM/DoE/Rethusen g Special School	ECO

	h) The JoJo tanks, or any aboveground tanks storing water for human use, should be monitored frequently for the presence of toxic bacterial, fungal buildup and physio- chemical changes that could impact the health of water users. The frequency of monitoring and cleaning of the tanks must be determined by the LDPWR&I in consultation with the storage tank manufacturers.	Throughout operational phase	PM/DoE/Rethuseng Special School	ECO
4) Fauna and Flora	a) As a broader part of the site will be utilised the children of the school must be educated on the potential for scorpions, reptiles and other species occurring in the area.	Throughout operational phase	DoE/Rethuseng Special School	ECO

Objective	Action	Timeframe	Implementation	Monitoring
	b) Children should be educated to leave faunal species alone and inform teachers if they spot potentially dangerous fauna in order for specialists to be called to remove these species and relocate them.	Throughout operational phase	DoE/Rethuseng Special School	ECO
	c) Vehicles should be parked in designated areas and not in areas where natural vegetation occurs, this is particularly important for larger events such as sports events.	Throughout operational phase	DoE/Rethuseng Special School	ECO
	d) Ongoing AIP plant monitoring and clearing/control should take place throughout the operational phase, and the project perimeters should be regularly checked for AIP establishment to prevent spread into surrounding natural areas.	Throughout operational phase	DoE/Rethuseng Special School	ECO/EO

9 Monitoring

The key to a successful EMPr is appropriate monitoring and review to ensure effective functioning of the EMPr and to identify and implement corrective measures in a timely manner. In the event where discrepancies are identified, the problem must be investigated and attended to. All the results obtained during environmental monitoring must be documented for audit purposes.

An audit of the environmental monitoring and management actions undertaken is essential to ensure that it is effective in operation, is meeting specified goals, and performs in accordance with relevant regulations and standards.

Compliance monitoring is to be undertaken as specified in **Table 10-1** below.

Table 10-1: Monitoring Method

Project Phase	Monitoring Method	Monitoring Frequency	Reporting Frequency
External Monitoring by an ECO			
Pre-construction Phase	A site visit and associated pre-construction audit report to be prepared immediately prior to the start of construction. The report will document existing pre-construction conditions and any non-compliance to be addressed prior to the start of construction.	Once off	Once off
Construction Phase	Independent ECO audits to be conducted at the frequency specified by the LEDET.	▪ To be determined by the LEDET	
Operational Phase	Independent ECO audits to be undertaken at the frequency specified by the LEDET.	▪ To be determined by the LEDET	

During audits, the ECO will make observations regarding the implementation of the impact management outcomes. The ECO will then assess the extent to which the impact management outcomes are being achieved and issue non-conformances as required. Non-conformances will therefore be based on compliance with both the impact management outcomes and actions and will be reported to LDPWR&I and their appointed Agents (including Engineers and Contractors).

External environmental audit reports are to be submitted to LEDET and all Potential and Registered I&APs are to be notified of the availability of the independent audit report for review and comment.

10 Environmental Awareness Planning

Appendix 4 of the 2014 EIA Regulations requires the development of an environmental awareness plan describing the manner in which LDPWR&I, DoE, IDC Architects and Rethuseng Special School intends on informing its employees of any environmental risks which may result from their work and the manner in which the risk must be dealt with to avoid pollution or degradation of the environment.

All internal staff and external Agents undertaking work on the proposed construction Rethuseng Special School must undergo Environmental induction and training which must include the contents of the EMPr. During the construction phase, regular Health and Safety Toolbox Talks must be held to discuss to address potential environmental risks, near misses or incidents and how they can be avoided in future. Regular drills are to be held to ensure that all staff are aware of the spill contingency and other environmental emergency procedures as applicable and can perform these procedures in reasonable timeframes.

During the operational phase DoE and Rethuseng Special School can make a positive impact by implementing an effective environmental awareness plan which can be facilitated by integrating environmental education into the curriculum, learners can be equipped with the knowledge and skills necessary to become environmentally responsible citizens. DoE together with Rethuseng Special School can organise events that provide hands-on learning experiences and engage students in key environmental issues such as waste reduction, water conservation and biodiversity. By inviting local environmental experts to give presentations and workshops, the school can further enhance its efforts to raise awareness and inspire change.

Refer to the Environmental Policy for the Operational Phase in **Appendix B**.

11 Amendments

Amendments to the EMPr may be required as the site activities proceed. Regulation 36 (1) of the NEMA EIA regulations states: "Where an amendment is required to the impact management actions of an EMPr, such amendments may immediately be effected by the holder and reflected in the next environmental audit report submitted as contemplated in the environmental authorisation and regulation 34".

Regulation 36 (2) states: "Where an amendment to the impact management outcomes of an EMPr or an amendment of the closure objectives of a closure plan is required before an audit is required in terms of the environmental authorisation, an EMPr or closure plan may be amended on application by the holder of the environmental authorisation."

Therefore, while the impact management actions can be amended without a formal amendment application process, amendment of the impact management outcomes or objectives will require application to the authority and a public participation process as outlined in Regulation 37.

Further it is suggested that for this EMPr any amendment to the impact management actions in terms of Regulation 36(1) be discussed during site visits. Any amendments should then be agreed to by the PM and EO prior to being included in the audit reports.

12 Department of Public Works Acceptance

I, _____, (full name)
representing

_____, (company name)
have read, understood and accept the above environmental management programme as a framework for my company's environmental performance during the above mentioned activities.

8 Contractor's Acceptance

I, _____, (full name)
representing

_____, (company name)
have read, understood and accept the above environmental management programme as a framework for my company's environmental performance during the above-mentioned activities.

9 Rethuseng Special School Acceptance

I, _____, (full name)
representing

_____, (company name)
have read, understood and accept the above environmental management programme as a framework for my company's environmental performance during the above mentioned activities.