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ENVIRONMENTAL
COMPLIANCE CONSULTANCY



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ENVIRONMENTAL MANAGEMENT PLAN

CONSTRUCTION OF THE B2GOLD NAMIBIA (Pty) Ltd 66 kV POWER LINE,
OTJOZONDJUPA REGION, NAMIBIA

PREPARED FOR



FEBRUARY 2020

TITLE AND APPROVAL PAGE

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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 |
| NamPower | Namibia Power Cooperation |
| kV | Kilovolt |

1 INTRODUCTION

1.1 PROJECT BACKGROUND

Environmental Compliance Consultancy (ECC) has compiled this Environmental Management Plan (EMP) in accordance with the Environmental Management Act, No. 7 of 2007 on behalf of B2Gold Namibia (Pty) Ltd (herein referred to as the proponent). The purpose of this EMP is to support the construction of the 66 kV power line of B2Gold, on behalf of the Namibia Power Cooperation (NamPower) (Pty) Ltd. The proposed 66 kV overhead transmission power line will be approximately 20 – 25 km long, located 70 km north of Otjiwarongo in the Otjozondjupa Region of Namibia (

FIGURE 1 – LOCATION OF THE PROPOSED OVERHEAD TRANSMISSION POWER LINE). The proponent has identified the need to upgrade their power supply in order to meet the energy demands resulting from the expanding mining infrastructure.

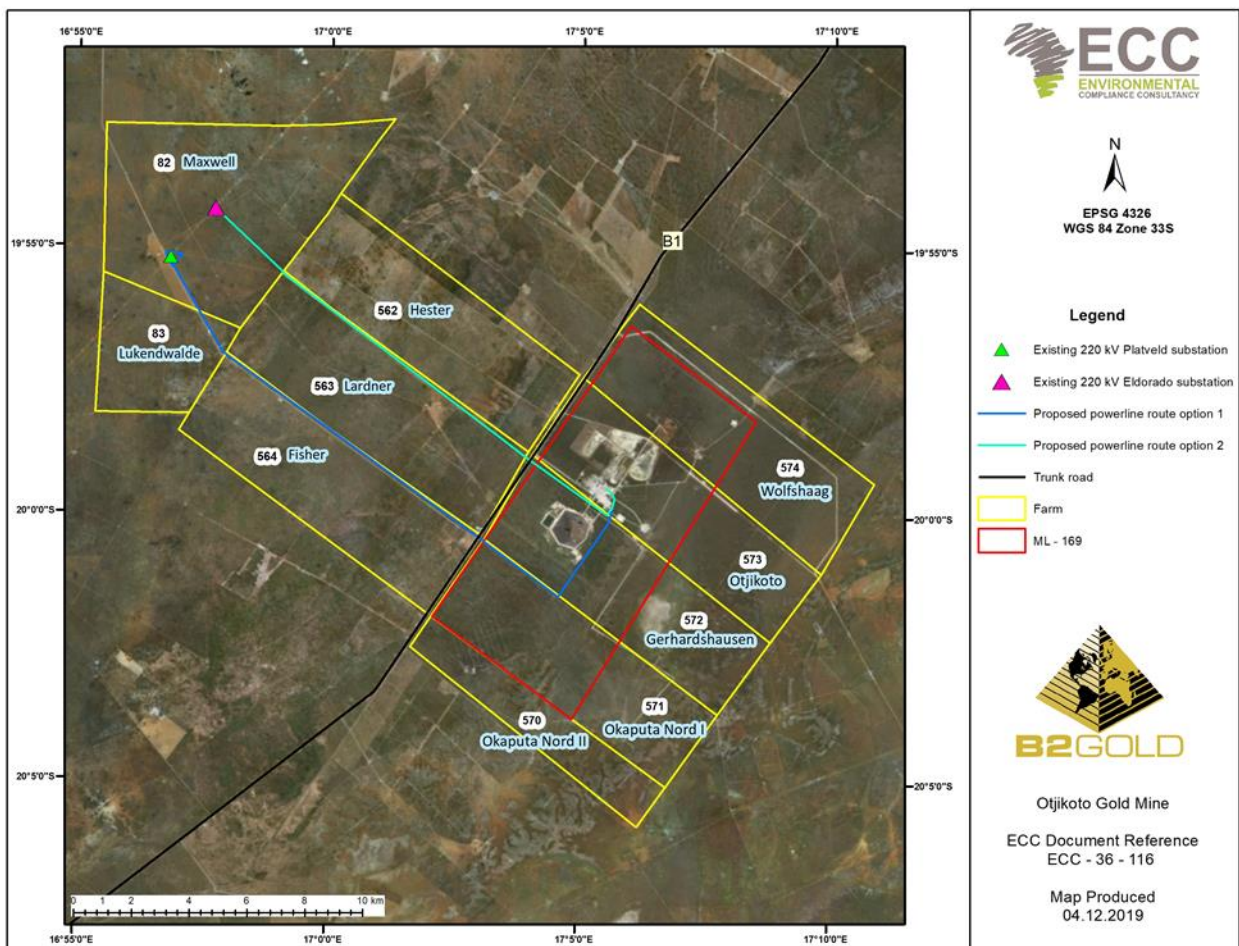


FIGURE 1 – LOCATION OF THE PROPOSED OVERHEAD TRANSMISSION POWER LINE

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 EMP are required to be submitted as part of the application process, as well as to support the decision-making process. This report presents the EMP and has been undertaken in terms of the requirements of the Act and its Regulations.

1.3 PURPOSE AND SCOPE OF THIS REPORT

ECC has been engaged by B2Gold Namibia (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.

Construction phase: The proposed construction phase will include low-impact and non-intrusive activities. The following activities are envisaged during the proposed project:

- Vegetation removal for the power line servitude and access road, but protected vegetation will be preserved.
- Connection to the existing substation.
- Installation of prefabricated standard substation components.
- Ground preparation (trenches and levelling) for the guyed towers and stay anchors.

Operational phase: Once the operational, monthly inspection is usually scheduled for the power line and the maintenance of the servitude. This will include clearing and maintaining vegetation along the access road as well as under the power line. Monthly inspections at the substations are usually scheduled. Yearly maintenance takes place during working hours and can last from one day to two weeks.

1.4 MANAGEMENT OF THIS EMP

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

This EMP shall be circulated to all contractors and shall 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
- 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 shall provide a project team to oversee and undertake the preparation and construction works, which shall be composed of the proponent's personnel and contractors. A nominated role shall 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 shall 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 shall 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"> - Overall responsibility for the implementation and management of this EMP. - Ensure the environmental policy is communicated to all personnel throughout the proposed project. - Responsible for providing the required resources (including financial and technical) to complete the required tasks. |
| Project Manager | <p>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.</p> <ul style="list-style-type: none"> - Ensuring all personnel are aware of the commitments made in this EMP and any other relevant regulatory requirements applicable to the project - Responsible for the management, maintenance and revisions of this EMP - Ensuring adequate resources are made available for implementation of this EMP - Maintain the community issues and concern register, and keep records of complaints; - Ensuring all employees and contractors participate in a site induction process prior to commencing work on the project; - Maintain up to date register of employees who have completed the site induction |

| ROLE | RESPONSIBILITY & DUTIES |
|--------------------------------|--|
| | <ul style="list-style-type: none"> - Provisioning of environmental awareness/management training and inductions for all employees - Ensuring that best environmental practice is undertaken throughout the duration of the project, and - Report any non-compliance or accidents to the regulatory authority. |
| Site manager/contractors | <p>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:</p> <ul style="list-style-type: none"> - Managing the preparation and implementation of method statements for certain activities, and ensuring the Environment Manager reviews all method statements and the relevant environmental protocols are incorporated - Reporting any non-compliance or accidents to the project manager and environment manager; - 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 - 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 adhere to this EMP at all times, and - Receiving, responding to and recording complaints. |
| Employees/contractor employees | <p>Responsible for being compliant with this EMP throughout the construction work, in addition to:</p> <ul style="list-style-type: none"> - Ensuring they have undertaken a site induction and are conversant with the requirements of this EMP, - Ensuring appropriate briefings for certain activities have been provided and fully understood - Adherence to this EMP at all times, and - Reporting of any operations and conditions that deviate from the EMP or any non-compliant issues or accidents to the Environment Manager and Site Manager/Contractor. |
| Environmental Control Officer | <p>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:</p> <ul style="list-style-type: none"> - Ensuring that the site and project manager are well aware of the environmental management plan procedures - For monitoring of the site and enforcing health and hygiene measures - Investigate when there's an incident, such as pollution and a noise problem - Conserving the environment and the resources |
| Safety Officer | <p>A Safety officer for the project will be available, as required, throughout the construction of the project. The Safety Officer will be responsible for the following roles:</p> <ul style="list-style-type: none"> - Ensuring and maintaining zero loss injuries - Assessing risks on construction site - Ensuring a safe working environment |

| ROLE | RESPONSIBILITY & DUTIES |
|------|---|
| | <ul style="list-style-type: none"> - Carrying out inductions to employees and or contractors for construction and operations activities. |

2.2 CONTRACTORS

Any contractors hired during the construction works or maintenance activities during the operational phase shall be compliant with this EMP, and shall 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 shall comply with the requirements of the Republic of Namibia Regulations for Labour, Health and Safety, and any amendments to these regulations. The following shall be complied with:

- In liaison with local government and community authorities, the proponent shall 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 shall be made known together with the associated skills and qualifications
- The maximum length of time the job is likely to last for shall be clearly indicated
- Foreign workers with no proof of permanent legal residence shall not be hired, and
- Every effort shall 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 – ENVIRONMENTAL RISKS AND ISSUES, AND MITIGATION AND MONITORING MEASURES FOR THE POWER LINE CONSTRUCTION AND OPERATION

| ASPECT | POTENTIAL IMPACTS | MANAGEMENT/MITIGATION MEASURES | MONITORING REQUIREMENTS | RESPONSIBILITY |
|--|---|---|--|---|
| Having screened all potential impacts and having assessed those applicable to the criteria, a few points relevant to the impacts and corresponding mitigation measures are summarized below. | | | | |
| Avifauna | <ul style="list-style-type: none"> - Possible increase in bird disturbance, collision and electrocution due to the overhead transmission power line construction | The powerline infrastructure is likely to have impacts on the avifauna, especially on large birds, therefore the following should apply: <ul style="list-style-type: none"> - Pre-inspection of any avifauna nesting areas, especially vulture nest before vegetation removal and servitude construction. - Design the power line structures in accordance with the South African National Standards 10280 standards, in which the safety clearances between phase and earth are specified. - Sensitive sections of power line should be marked to increase visibility (Appendix A, Figure 34, Table 9, p44). - The top optical ground wire (earth/ground) wire should be marked, using large SWAN-FLIGHT Diverters in order to increase the visibility of the line. - The Bird Flight Diverters should be alternating grey and yellow and fitted at a distance of 5 – 10 m apart and the full length of each span should be marked. - Construct a simple bird perch device on top of the tower structure on top of the 66 kV tower structure to encourage birds to perch above dangerous structures (insulators) rather than on them, or use braced insulators in vulture-sensitive areas. | <ul style="list-style-type: none"> - Daily - Weekly and - Annual observations | <ul style="list-style-type: none"> - Project manager - Site manager |

| ASPECT | POTENTIAL IMPACTS | MANAGEMENT/MITIGATION MEASURES | MONITORING REQUIREMENTS | RESPONSIBILITY |
|--------------------|---|--|---|---|
| | | <ul style="list-style-type: none"> - Disturbance of nesting birds, in particular, large raptors/vultures, or Kori Bustards should be avoided, if encountered during operations. - Ensure that the entire power line route is monitored for any signs of bird mortalities resulting from the operation of the line e.g. regular monitoring patrols should be carried out once a month for at least the first year after construction, and thereafter at least once per quarter. - Existing power lines in the area should also be inspected from time to time, for cumulative impacts. - Record all bird mortalities on a standardized form, with the global positioning system coordinates and power line structure and other details, and photographs of the carcass (especially the head of the bird), power line structure and general habitat. - Should collisions still take place after mitigation, other methods should be considered, more stringent and regular monitoring is recommended, and - Mitigation should take place during the construction stage, rather than the operational stage; regular monitoring would be important during the operational stage. | | |
| Farm owners | <ul style="list-style-type: none"> - Possible conflict, grievance or complains - Social discomfort/anxiety - Health and safety impact or risk to a construction worker and/or nearby community | <ul style="list-style-type: none"> - Establish effective communication programmes with I&APs. - Negotiate acceptable and lawful land lease price with the local authority. | <ul style="list-style-type: none"> - Daily - Weekly and - Annually | <ul style="list-style-type: none"> - Project manager - Site manager - Employee |

| ASPECT | POTENTIAL IMPACTS | MANAGEMENT/MITIGATION MEASURES | MONITORING REQUIREMENTS | RESPONSIBILITY |
|---------------------------|---|--|---|--|
| | | <ul style="list-style-type: none"> - Develop and implement the operations manual or procedures to work on private farms and implement monitoring programmes thereafter. - Use correct personal protective equipment, if required - Comply with all applicable national regulations and laws to minimize risks at the workplace - Ensure appropriate supervision of activities - Any accidents or incidents should immediately be reported to the project manager - All incidents should be recorded in an incident register. | | |
| Soil contamination | <ul style="list-style-type: none"> - Soil pollution through waste and hazardous substances utilized during construction spilling on the ground | <ul style="list-style-type: none"> - Any spills and waste should be cleaned up immediately - A 'good housekeeping' policy shall be adopted across the construction and maintenance working areas - Under no circumstances should oil or other substances be disposed of on-site - Minimise the disturbance and removal of topsoil | <ul style="list-style-type: none"> - Daily visual inspection of operations | <ul style="list-style-type: none"> - Project manager |
| Waste management | <ul style="list-style-type: none"> - Visual impacts - Waste pollution | <ul style="list-style-type: none"> - Training and toolbox talks - Good housekeeping across the site - Remove construction waste including general waste on a daily basis - All working areas shall apply good house-keeping - Marked bins should be provided across the site, if necessary - Littering by the construction workers shall not be allowed | <ul style="list-style-type: none"> - Daily observations - Weekly checks | <ul style="list-style-type: none"> - Project Manager - Employees |

| ASPECT | POTENTIAL IMPACTS | MANAGEMENT/MITIGATION MEASURES | MONITORING REQUIREMENTS | RESPONSIBILITY |
|--------------|--|---|--|--|
| Noise | <ul style="list-style-type: none"> - A nuisance to nearby communities | <ul style="list-style-type: none"> - Noise should be minimised as much as possible during construction works. The following measures should apply: <ul style="list-style-type: none"> o Limit working hours to 7 am to 5 pm weekdays and 7 am until 1 pm on Saturday o Regular maintenance of equipment o All equipment to be shut down or throttled back between periods of use o Hearing protection should be provided to employees operating equipment which produces excessive noise. | <ul style="list-style-type: none"> - Daily observations | <ul style="list-style-type: none"> - Project manager - Employees |

3 COMMUNICATIONS 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 and made 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 COMMUNICATIONS

During construction, the project manager and site manager shall 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 shall be distributed to the construction project team, including contractors, to ensure that the environmental requirements are communicated effectively. Key activities and environmentally sensitive operations shall also be briefed to workers and contractors.

During the construction phase, regular communications between the management team shall 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 shall 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 shall 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 shall inform the site manager of issues, concerns or complaints.

The project manager shall 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 is taken to resolve issues, and date of complaint handover. The project manager shall be responsible for nominating the correct personnel to coordinate and resolve the issue.

The workforce shall 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 shall 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.

The complaints register shall 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 shall 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 shall be inducted to the site with specific environmental and social awareness training, and health and safety issues. The environment and social awareness training shall ensure that personnel is 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 shall 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
 - o What can be done to mitigate against such impacts
- The inductee’s role and responsibilities 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 shall be on-site throughout the construction works and shall 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 shall be notified to the project manager and actioned as soon as is reasonably practicable.

4.2.2. MONTHLY COMPLIANCE MONITORING

Monthly inspections shall 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 shall 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.

4.3 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) shall 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 shall 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 shall 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 shall 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 shall be produced. The notice shall be generated during the inspections and the project manager shall 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

Works shall be stopped in the event of a non-compliance until corrective action(s) has been completed.

4.6 DISCIPLINARY ACTION

This EMP is a legally binding document and non-compliance with it shall 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 shall 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 the farmers, and
- Protect local flora and fauna.

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 on the basis of information provided to ECC up to December 2019
- 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 on the basis of information provided by the proponent and the Environmental Scoping Report