Application for Environmental Authorization for Proposed Safari Lodge near Malelane Gate, Kruger National Park, Mpumalanga

DEA Reference: 14/12/16/3/3/1/1280

DRAFT ENVIRONMENTAL MANAGEMENT PROGRAMME (EMPr)

Compiled by:

NuLeaf PLANNING & ENVIRONMENTAL
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On behalf of:

Malelane Safari Resort Investments (Pty) Ltd.

February 2015
ACRONYMS AND ABBREVIATIONS

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
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<tr>
<td>BA</td>
<td>Basic Assessment</td>
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<td>BAR</td>
<td>Basic Assessment Report</td>
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<td>CDF</td>
<td>Conservation Development Framework</td>
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<td>CMP</td>
<td>Construction Management Plan</td>
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<td>DEA</td>
<td>South African National Department of Environmental Affairs</td>
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<td>DWA</td>
<td>South African National Department of Water Affairs</td>
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<tr>
<td>EA</td>
<td>Environmental Authorisation</td>
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<td>ECO</td>
<td>Environmental Control Officer</td>
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<td>EIA</td>
<td>Environmental Impact Assessment</td>
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<td>EMPr</td>
<td>Environmental Management Programme</td>
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<td>EMS</td>
<td>Environmental Management System</td>
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<td>EO</td>
<td>Environmental Officer</td>
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<tr>
<td>I&amp;AP</td>
<td>Interested and Affected Party</td>
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<tr>
<td>IEM</td>
<td>Integrated Environmental Management</td>
</tr>
<tr>
<td>KNP</td>
<td>Kruger National Park</td>
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<td>LED</td>
<td>Local Economic Development</td>
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<tr>
<td>MTPA</td>
<td>Mpumalanga Tourism and Parks Agency</td>
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<tr>
<td>NEMA</td>
<td>National Environmental Management Act, Act No. 107 of 1998</td>
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<tr>
<td>NEMPAA</td>
<td>National Environmental Management: Protected Areas Act, Act No. 57 of 2003</td>
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<td>OMP</td>
<td>Operational Management Plan</td>
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<td>PPP</td>
<td>Public Private Partnership</td>
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<td>SAHRA</td>
<td>South African Heritage Resources Agency</td>
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<td>SANParks</td>
<td>South African National Parks</td>
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<tr>
<td>TGSA</td>
<td>Tourism Grading Council of South Africa</td>
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<tr>
<td>WHO</td>
<td>World Health Organisation</td>
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GLOSSARY OF TERMS

Alien Vegetation: Alien vegetation defined as undesirable plant growth which shall include, but not be limited to all declared category 1 and 2 listed invader species as set out in the Conservation of Agricultural Resources Act (CARA) regulations.

Alien Species: A plant or animal species introduced from elsewhere: neither endemic nor indigenous.

Alternatives: In relation to a proposed activity, means different means of meeting the general purpose and requirements of the activity, which may include alternatives to:

(a) The property on which or location where it is proposed to undertake the activity;
(b) The type of activity to be undertaken;
(c) The design or layout of activity;
(d) The technology to be used in the activity; and
(e) The operational aspects of the activity.

Applicant: Any person who applies for an authorization to undertake an activity or to cause such activity to be undertaken as contemplated in the National Environmental Management Act (Act No. 107 of 1998), as amended and the Environmental Impact Assessment Regulations, 20010.

Buffer zone: Is a collar of land that filters out inappropriate influences from surrounding activities, also known as edge effects, including the effects of invasive plant and animal species, physical damage and soil compaction caused by trampling and harvesting, abiotic habitat alterations and pollution. Buffer zones can also provide more landscape needed for ecological processes, such as fire.

Construction Activity: Any action taken by the Contractor, his subcontractors, suppliers or personnel during the construction process.

Ecology: The study of the interrelationships between organisms and their environments.

Environment: All physical, chemical and biological factors and conditions that influence an object and/or organism.

Environmental Impact: An Impact or Environmental Impact is the degree of change to the environment, whether desirable or undesirable, that will result from the effect of a defined activity. An Impact may be the direct or indirect consequence of the activity and may be simple or cumulative in nature.

Environmental Impact Assessment: Assessment of the effects of a development on the environment.

Environmental Management Programme: A legally binding working document, which stipulates environmental and socio-economic mitigation measures that must be implemented by
several responsible parties throughout the duration of the proposed project.

Indigenous: Means a species that occurs, or has historically occurred, naturally in a free state within the borders of South Africa. Species that have been introduced to South Africa as a result of human activity are excluded (South Africa (Republic) National Environmental Management: Biodiversity Act, 2004: Chapter 1).

Interested and Affected Party: Any person, group of persons or organization interested in or affected by an activity contemplated in an application, or any organ of state that may have jurisdiction over any aspect of the activity.

Invasive vegetation: Plant species that show the potential to occupy in unnatural numbers, any disturbed area, including pioneer species.

Public Participation: The legislated process contemplated in terms GN R543, in which all potential interested and affected parties are informed of the proposed project and afforded the opportunity to input, comment and object. Specific requirements are listed in terms of advertising and making draft reports available for comment.

Road Reserve: The road reserve is a corridor of land, defined by co-ordinates and proclamation, within which the road, including access intersections or interchanges, is situated. A road reserve may, or may not, be bounded by a fence.

Road Width: The area within the Road Reserve including all areas beyond the Road Reserve that are affected by the continuous presence of the road i.e. the verge.

Mitigate: The implementation of practical measures to reduce adverse impacts Public Participation Process: is a process in which potential interested and affected parties are given an opportunity to comment on, or raise issues relevant to, specific matters.

Red data plant species: Are fauna and flora species that require environmental protection based on the World Conservation Union (IUCN) categories and criteria.

ROD: Record of Decision pertaining to the Application for Environmental Authorisation issued by the Competent Authority. The RoD is legally binding on the Applicant and may contain a positive or negative decision on the Application as well as conditions and provisions for each.

Soil Compaction: Mechanically increasing the density of the soil, vehicle passage or any other type of loading. Wet soils compact easier than moist or dry soils.

Species: Means a kind of animal, plant or other organism that does not normally interbreed with individuals of another kind. The term “species” include any sub-species, cultivar, variety, geographic race, strain, hybrid or geographically separate population (South Africa [Republic] National Environmental Management: Biodiversity Act, 2004: Chapter 1).

The Contractor: The contractor, as the developers agent on site, is bound by the ROD and EMP conditions through his/her contract with the developer, and is
The Contractor shall submit to the Site Agent a nominated representative of the Contractor as an EO to assist with day to day monitoring of the construction activities for the contract.

Vegetation: Is a collective word for plants occurring in an area.

Vulnerable: A taxon is ‘Vulnerable’ when it is not ‘Critically Endangered’ or ‘Endangered’ but is facing a high risk of extinction in the wild in the medium term future.

Watercourse: A river or spring; a natural channel in which water flows regularly or intermittently; a wetland, lake or dam into which, or from which, water flows; and any collection of water which the Minister may by notice in the Government Gazette, declare to be a watercourse, and a reference to a watercourse includes, where relevant, its bed and banks” (South Africa [Republic] National Water Act, 1998).
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APPENDICES

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Appendix B.1: Layout of the Lodge
Appendix B.2: Layout of the Park-and-Ride
Appendix B.3: Layout of the Realigned S114
SECTION A: GENERAL

1. INTRODUCTION

A key requirement of the National Environmental Management Act (NEMA) of 1998 is compliance with the principles of Integrated Environmental Management (IEM). Chapter Five of NEMA deals with IEM and its objective to promote the application of appropriate environmental management tools in order to ensure the integrated environmental management of activities.

Among these tools are Environmental Impact Assessments (EIAs) and Environmental Management Programmes (EMPrs). In compliance with the above mentioned environmental legislation, the Department of Environmental Affairs (DEA) requires that the Applicant undertake a Basic Assessment (BA) for the proposed development, and that the Basic Assessment Report (BAR) includes a detailed EMPr.

The EMPr typically becomes part of the Environmental Authorization (EA) prepared by the relevant environmental authority and becomes the basis for monitoring compliance with the recommendations of the EIA both during the Construction and Operational Phases.

The Environmental Management Programme (EMPr) addresses the construction and operational phases of the project. It serves as a stand-alone document to be disseminated to and used by the contractor, lodge manager and others involved in the construction and/or operational phases of the development.

It should be noted that the guidelines listed hereunder are not to be considered finite. Experience has shown that additional environmental issues are bound to arise as the project unfolds. When this happens, the Environmental Management Programme (EMPr) must be updated accordingly.

The Environmental Management Programme will ensure that the environmental commitments sketched as mitigation measures in the BA are adhered to. In addition, the EMPr can be used to evaluate the effectiveness of mitigation measures.

2. DETAILS AND EXPERTISE OF EAP

<table>
<thead>
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<td>Email</td>
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<tr>
<td>Expertise</td>
<td>Professional Landscape Architect</td>
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Please refer to Appendix A for EAP curriculum vitae.
3. BACKGROUND

In addition to being located within the Kruger National Park, the development of the proposed Malelane Safari Lodge will take place at the confluence of the Crocodile and Timfenheni Rivers. There are highly sensitive areas located in and around the proposed Lodge site, particularly relating to sodic soils, protected and endangered flora and potential bird breeding / nesting sites.

Sensitive areas where sodic soils exist, as well as, the critically endangered Adenium swazicum have been taken into consideration and left as natural pockets within the development site and will not impacted upon.

With that being said, the proposed lodge development layout will encroach into certain areas of the riparian habitat and will at the very least, result in the pruning / removal of some of said vegetation. This in turn could lead to the destabilization of the riverbank and flood attenuation.

The African Fish-Eagle, as well as, the endangered Pel’s Fishing-owl both have confirmed nesting sites approximately 1.5 Km downstream from the proposed lodge development site. According to the Avifaunal Specialist Report, it is highly likely that both bird species hunt along the Crocodile River and could be disturbed by construction and operational activities. The proposed lodge development site falls just outside of the recommended 1.5km buffer of the nesting sites and, therefore, should not impact negatively on the bird species.

Refer to Appendix B.1, B.2 and B.3 for layouts of the project sites.

Potential impacts relating to the 24-hour access between the Park-and-Ride facility and the Lodge were also identified as significant, especially in terms of visual and noise impact on adjacent tourism destinations, and also in terms of road-kills at night. The prohibition of after-hours traffic along the S114 and the implementation of GPS monitoring of all vehicle routes and speeds will help to manage this issue.

Overall, construction within a protected area is a high-risk activity requiring close management and supervision by the contractor. Of particular concern is poaching of both fauna and flora, as species can be easily smuggled out of the Park via the numerous construction vehicles. Tight control and very specific management of the construction site by the Contractor, as well as strict gate access control will help to manage this issue.

4. ROLES AND RESPONSIBILITIES

<table>
<thead>
<tr>
<th>Party</th>
<th>Responsibility</th>
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<tr>
<td>Applicant</td>
<td>• Ensure adherence to, and compliance with, the EMPr in a legal and timely manner. This relates to all phases of the project lifecycle.</td>
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<td>• Appoint an Independent Environmental Control Officer (ECO) during both Construction and Operation Phases.</td>
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<td></td>
<td>• Ensure that a monitoring programme is drafted and implemented to assess compliance with the EMPr during the construction phase.</td>
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<td>• Ensure that contractors and operators undertake to adhere to the provisions of the EMPr as part of their respective contracts.</td>
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<td>• Ensure that independent Environmental Audits, including a Post Construction Close-Out audit is undertaken. The results of all audits must be forwarded to the Environmental Authority within 30 days after completion of the audit.</td>
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<td>• Ensure that all monitoring and audit reports are submitted to the Environmental Authority and that the contractor and operator implement recommendations.</td>
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**Contractor**

- Ensure adherence to, and compliance with, the Construction EMPr in a legal and timely manner.
- Ensure that all staff members, sub-contractors and suppliers have a comprehensive understanding of the EMPr and adhere to the provisions for the duration of the construction phase.
- Designate a permanent Environmental Officer (EO) to monitor environmental compliance on a day-to-day basis on the construction site.
- Ensure that all staff members, sub-contractors and suppliers are aware of the environmental issues relating to the construction activities that they are undertaking on site and of all mitigating and precautionary measures that must be implemented.
- Ensure that training is undertaken for construction supervisors and crews to recognise environmental ‘red flags’ and ensure that these will:
  - not be disturbed, damaged or removed and
  - be brought to the immediate attention of the EO or ECO to determine an action plan and way forward.
- Develop a layout of the operations of the construction site indicating the position of all construction activities, including but not limited to: offices, ablution facilities, storage areas, workshops, batching plant, stockpile areas, waste disposal facilities, hazardous substance storage area, access routes, etc. This layout plan is to be submitted to the ECO for acceptance prior to site establishment. Any changes to this plan will need to be reviewed in conjunction with the ECO.
- Ensure that all recommendations made in monitoring and audit reports are implemented throughout the construction phase.
- Accept liability for any and all Work required in terms of the environmental specifications, resulting from environmental negligence, mismanagement and/or non-compliance.

**Operator**

- Ensure adherence to, and compliance with, the Operational EMPr in a legal and timely manner.
- Ensure that all staff members and suppliers have a comprehensive understanding of the EMPr and adhere to the provisions for the duration of the operational phase.
- Designate an Environmental Officer (EO) to monitor environmental compliance on a day-to-day basis.
- Ensure that all staff members and suppliers are aware of potential environmental issues and of all mitigating and precautionary measures that must be implemented.
- Ensure that staff members and suppliers are able to recognise environmental ‘red flags’ and ensure that these will:
  - not be disturbed, damaged or removed and
  - be brought to the immediate attention of the EO or ECO to determine an action plan and way forward.
- Ensure that all recommendations made in monitoring and audit reports are implemented throughout the operational phase.
- Accept liability for any and all Work required in terms of the environmental specifications, resulting from environmental negligence, mismanagement and/or non-compliance.

**Environmental Officer (EO)**

- Manage the day-to-day on-site implementation of the environmental specifications during the construction and operational phases, and provide support and input where required.
- Compile regular (usually weekly) monitoring reports for submission to the contractor/operator, and copied to the ECO.
- Act as liaison and advisor on all environmental and related issues, and seek advice from the ECO where required.
- Understand the provisions and limitations of the project in terms of the EMPr and relevant regulations (such as NEMA and NEMWA) and provide advice accordingly.
5. COMPLIANCE

Compliance involves actions and programmes designed to ensure that all relevant environmental laws, legislation, standards and other requirements such as permits are followed and adhered to.

5.1 Environmental monitoring and auditing

Environmental monitoring is the continuous evaluation of the status and condition of environmental elements, whereas, environmental auditing is the process of comparing the impacts predicted with those which have actually occurred during implementation.

The key to a successful Environmental Management System (EMS) is regular monitoring to identify and implement corrective measures in a timely manner and independent auditing to evaluate successful compliance with environmental specifications and outcomes. The ultimate purpose of environmental monitoring and auditing is to confirm that all relevant programmes, legislation, laws and policies are adhered to and abided by and that the environmental specifications are being implemented in an effective and correct manner. Monitoring and auditing is intended to promote environmental best practice, ensure protection of resources and support sustainable development.

5.2 Monitoring Methods

In order to ensure that the above objectives are met, the following monitoring methods will be employed:

- Aspect monitoring (such as water quality);
- Incident reporting;
- Site inspections;
- Site monitoring and reporting;
- Independent external auditing.

5.3 Timeframes/ Frequency

Site monitoring should be undertaken daily on an on-going basis throughout the project lifecycle. External auditing should take place once a month during the construction period, every 3 months during the rehabilitation period and annually during the operational period.
The completed monitoring reports should be submitted to all relevant parties, including the ECO who will conduct audits at regular intervals. Audit reports will, in turn, be submitted to all relevant parties, including the EO, who will drive the implementation of recommendations.

5.4 Non-compliance

Failure by the contractor, operator and their staff and suppliers to comply with all relevant programmes laws, legislation, policies and mitigation measures laid out in this EMPr will result in the following actions and consequences:

- Notifications will be issued in monitoring and auditing reports advising of failure to adhere to the measures stipulated in the BA/EIA/EMPr.
- Failure to comply / respond to notifications and recommendations within a specified timeframe will result in written warning being issued.
- Failure to comply / respond to warnings within a specified timeframe will result in fines being issued.
- Continued and wilful failure to comply / respond will result in the suspension of site activities until compliance is reached to the satisfaction of the ECO. In the event of severe negligence or failure to comply, all site activities may be terminated. Criminal proceedings may ensue.

6. ENVIRONMENTAL AWARENESS

An environmental awareness plan must be implemented for both the construction and operational phases. The approved EMPr will provide the basis of the information to be supplied, as well as any other relevant documentation, including any specialist reports.

All construction and operational staff, as well as, suppliers and regular out-sourced contractors will be required to attend a general orientation session prior to the commencement of any activities. All impacts that could potentially arise and affect the environment will be discussed and explained in detail, as well as required mitigation measures. The consequences of not following the mitigation measures as stipulated in the EMPr (i.e. non-compliance) will also be addressed.

All permanent staff must receive detailed training relative to their specific job description. This training will focus on the environmental issues and impacts that are directly linked to their activities. Staff will be briefed on the correct protocol and procedures to follow in the event of an incident or accident (spill, fire etc.) in order to minimize and contain the damage.

In addition, staff will be required to report all incidents so that the appropriate mitigation measures can be implemented in a timely manner.
SECTION B: MANAGEMENT PLANS

The mitigation and recommendations contained in the Management Plans that follow have been based on best environmental practice within a Protected Area, and have been supplemented with specialist recommendations extracted from specialist reports developed in support of the Environmental Impact Assessment process for this project.

7. PLANNING AND DESIGN MANAGEMENT PLAN

The Planning Management Plan (PMP) addresses all aspects of the planning and design phase, such as the detailed architectural, infrastructural and engineering services layout and design. All members of the planning and design team are to be in possession of this Management Plan and must be aware of the environmental aspects, risks and mitigation measures.

7.1 Planning and compliance

To comply with regulations pertaining to surface water, ground water and protected species.

7.1.1 Ground water

General mitigation:
- Register boreholes to be used for potable water extraction as per DWA requirements.
- Obtain a Water Use License for listed activities (including the package plant, water abstraction and irrigation with purified effluent as required).
- Specify water saving devices and technologies wherever possible. Measures include the specification of low flow shower heads and taps, and the use of grey water for on potable activities such as road wetting and irrigation.
- No French drains or French drains used in conjunction with septic tanks are permitted.

7.1.2 Surface water

General mitigation:
- A minimum buffer zone of 30 m around any wetland should be established and regarded as No-Go areas for the development.
- Buildings and other hardened surface infrastructure (including storm water attenuation measures) should be located outside of buffered watercourses.

Specialist mitigation:
- Buildings and other hardened surface infrastructure (including storm water attenuation measures) should be located outside of buffered watercourses, sensitive areas and riparian habitat.

7.1.3 Protected species

General mitigation:
- 

Specialist mitigation:
- The sensitivity map must be used as a decision tool to guide the layout design. Development on areas of high environmental sensitivity should be avoided.
• A suitably experienced botanist should undertake a pre-construction (planning phase) walk-through all areas earmarked for development and identify and record the position of any and all protected species, as well recommend action to be taken. This may include a refinement of the layout, relocation transplanting, or removal of specimens (pending relevant permissions). This walk through must be undertaken during the growing season.

• A suitably experienced botanist should undertake a pre-construction (planning phase) walk along the proposed realignment of the S114 to determine the presence of sensitive environments, including sodic soils and *Adenium swazicum* habitats, as well recommend action to be taken. This may include a refinement of the alignment and/or relocation transplanting, or removal of specimens (pending relevant permissions). This walk through must be undertaken during the growing season.

• Refine the final layout of roads, buildings and infrastructure so that disturbance to large and significant/protected trees, is avoided/minimized. This includes identified *Aloe spicata*, *Sclerocarya birrea subsp. cafra*, *Combretum imberbe* and *Philenoptera violacea*, as well as, any additional conservation worthy species and individuals identified by the ecologist during the pre-construction walk-through.

• Prior to finalisation of the layout, a permit for the removal of any provincially protected species should be applied for through the Mpumalanga Tourism and Parks Agency (MTPA).

• Prior to finalisation of the layout, a permit for the removal of any nationally protected species should be applied for through the National Department of Agriculture Forestry and Fisheries (DAFF).

### 7.1.4 Storm water management

**General mitigation:**

- As per the Storm Water Management Plan (refer to section 11.1).

**Specialist mitigation:**

- 

### 7.1.5 Waste management

**General mitigation:**

- As per the Waste Management Plan (refer to section 10.1).

**Specialist mitigation:**

- 

### 7.2 Development footprint planning

*To ensure the development footprint is kept to a minimum and that sensitive environs are taken into consideration*

**General mitigation:**

- Consolidate the location of structures and infrastructure so as to localise and contain the development footprint. Retain all areas beyond the development footprint as natural/conservation landscape.

- No manicured landscape or gardening is permitted. All areas beyond the development footprint are to be rehabilitated as natural bush using appropriate endemic species.

- Combine access roads with power line servitudes, firebreaks etc. wherever possible.

- The internal road network should be developed as gravel tracks that allow for faunal dispersal and minimize fragmentation of ecologically sensitive areas.

- Combine bulk service infrastructure (electricity, water, sewage) into single trenches or alignments wherever possible.

- Plan to leave as much of the natural vegetation intact as possible.

- Design all perimeter fences so as to avoid corners where predators can chase and trap game.
Ensure that all perimeter fences allow access by small mammals, tortoises etc. while keeping dangerous game out.

Ensure that all permanent structures and infrastructure is located outside of the 1:100 year floodline of both the Crocodile and Timfenhene Rivers.

Specialist mitigation:

- Refine the final layout so that disturbance of sensitive environments is avoided / minimized. Adjust the location of facilities so as to minimise impact on the riparian zone.
- A minimum buffer zone of 30 m around the sodic soil sites and Adenium swazicum must be respected and be regarded as No-Go areas for the development. These areas should be incorporated into open space planning.
- Infrastructure corresponding to the riparian woodland units (pertaining to the lodge site) must be kept to a minimum and should be of low-impact. It should cater only for pedestrians (e.g. walkways).
- Refine the final layout of roads, buildings and infrastructure so that disturbance to micro habitat, such as, rocky outcrops and dead tree stumps is avoided / minimized.
- Footpaths through the natural vegetation must be designed as formalised paths and must be clearly demarcated. A balustrade or barrier should be used to discourage guest from leaving the dedicated footpath.
- Limit the extent of the meander along so as not to require a crossing over the Timfenheni River (i.e. no swing bridge is to be included). In addition, do not develop the meander as a boardwalk, but rather as a rustic nature trail appropriate for within the floodline.

7.3 Visual environment planning

To ensure that the visual impact on the surrounding area and sense of place will be kept to a minimum

7.3.1 General planning and design

General mitigation:

- Make use of earth tones and natural materials rather than primary colours and high-tech finishes.
- Limit buildings to single storeys and make use of light, shallow gradient roofs, mainly of canvas sheeting and steel sheeting material.
- Visually break up large bulky buildings into smaller, subtler, less prominent shapes and planes.
- Make use of canvas roofs and / or suitable paint colours on steel roofs reduce the impact of glare from sunlight.
- Make use of earthy, muted colours and avoid pastel and primary colours.
- Make use of natural, non-reflective, earthy materials rather than high-tech reflective materials.
- Avoid large expanses of glass. Where glass is used, ensure that this is tilted and tinted to reduce glare.
- No manicured landscape or gardening is permitted. All areas beyond the development footprint are to be rehabilitated as natural bush using appropriate endemic species.

Specialist mitigation:

- Do a corridor assessment prior to the construction of the S114 in order to identify the largest trees and densest vegetation patches. Plan road around these elements. This will limit the impact on the visual resource by retaining features in the landscape that contribute to the landscape character.
- Do a site assessment prior to construction of the Park-and-Ride in order to identify the largest trees and densest vegetation patches. Modify the Park-and-Ride layout to accommodate these elements as far as possible. This will limit the impact on the visual resource by retaining features in the landscape that contributes to the landscape character. This will also maintain the current screening capacity of the site.
- Do a site assessment prior to construction of the Lodge in order to identify the largest trees and densest vegetation patches. Plan the lodge to accommodate and optimise these landscape features. This will limit the impact on the visual resource by retaining features in the landscape that contribute to the landscape character and screening capacity of the site.
Appoint a suitably qualified professional to develop a landscaping / rehabilitation strategy for the Lodge and for the Park-and-Ride that fits seamlessly with the natural surroundings. Large trees and dense shrubs in the centre of the Park-and-Ride facility as well as on its borders will assist in reducing its visibility.

Introduce trees in and around the lodge development to increase the VAC of the site, especially near the western tented accommodation to reduce any possibility of views from the S121 and S114.

Reconsider the architectural style and layout of the Park-and-Ride to be more compatible and integrated with the existing context. It should be designed as part of the Malelane Gate complex and not seen as a separate standing facility.

Lower the height of the Welcome Centre. This will have a significant influence on the visibility from critical viewpoints.

Allow for screen planting at the Park-and-Ride along the southern and eastern boundary in order to limit the facility’s potential visibility from critical viewpoints. Screen planting can also be implemented along the existing and proposed entrance roads to the Park-and-Ride facility and the Malelane Gate.

Use PV modules that are manufactured with an Anti-Reflective Coating (ARC).

Signage should be simple and unobtrusive and not protrude above the skyline when viewed from any direction. Use existing signage as a precedent.

7.3.2 Lighting

General mitigation:
- Plan for all vehicles operating after-hours (including visitor shuttles, staff shuttles and game drive vehicles) to make use of the H-3 and S121 route when accessing the Lodge site. No after hour use of the S114 south of the Lodge will be permitted whatsoever.

Specialist mitigation:
- Confine light output within property boundaries through using specifically designed luminaires such as full cut-off luminaires to minimise upward spread of light near to and above the horizontal;
- Tilt spotlight luminaires to direct the light to the intended spot, instead of allowing it to light areas outside its purpose;
- Mount outdoor spot lights on the appropriate pole height. Higher mounting heights allow lower main beam angles which can reduce glare.
- Utilise control systems to reduce light levels during inactive periods or at predetermined times while maintaining sufficient lighting for safety and security (NEMA, 2000).
- Where vertical surfaces are illuminated, such as advertising signs or buildings façades, it is recommended that luminaires should light downwards. If up-lighting is the only alternative, the use of shields, baffles or louvers should be installed to reduce light spillage over or under the structure.
- Do not over illuminate areas. Use the correct illuminance intensity for the purpose intended.

7.4 Socio-economic planning

To ensure community beneficiation via job creation and skills transfer

General mitigation:
- The local authorities, community representatives, and organisations on the interested and affected party database should be informed of the final decision regarding the project and the potential job opportunities for locals and the employment procedures that the proponent intends following for the construction phase of the project.

Specialist mitigation:
- The NLM, in conjunction with the local business sector and representatives from the local hospitality industry, should identify strategies aimed at maximising the potential benefits associated with the project.
• Before the construction phase commences the applicant should meet with representatives from the NLM to establish the existence of a skills database for the area. If such a database exists it should be made available to the contractors appointed for the construction phase.
• The applicant should liaise with the NLM with regards the establishment of a database of local companies, specifically BBBEE companies, which qualify as potential service providers (e.g. construction companies, catering companies, waste collection companies, security companies etc.) prior to the commencement of the tender process for construction contractors. These companies should be notified of the tender process and invited to bid for project-related work.
• The applicant should identify local companies, specifically BEE companies, that qualify as potential service providers (e.g. construction companies, catering companies, waste collection companies, security companies etc.) prior to the commencement of the tender process for construction contractors. These companies should be notified of the tender process and invited to bid for project-related work;
• Where possible the applicant should assist local BBBEE companies to complete and submit the required tender forms and associated information.
• Where reasonable and practical, the applicant should appoint local contractors and implement a ‘locals first’ policy, especially for semi and low-skilled job categories. However, due to the low skills levels in the area, the majority of skilled posts are likely to be filled by people from outside the area.
• Where feasible, efforts should be made to employ local contractors that are compliant with Broad Based Black Economic Empowerment (BBBEE) criteria. In this regard the Public Private Partnership (PPP) agreement with SANParks requires the proponents to implement a Preferential Procurement Policy with the objective of ensuring that proposed development supports the objectives of Black Economic Empowerment (BEE);
• The applicant should consider the option of establishing a Monitoring Forum (MF) in order to monitor the construction phase and the implementation of the recommended mitigation measures. The MF should be established before the construction phase commences, and should include key stakeholders, including representatives from local communities, councillors, and the contractor(s). The MF should also be briefed on the potential risks to the local community associated with construction workers.

8. CONSTRUCTION MANAGEMENT PLAN

The Construction Management Plan (CMP) addresses the environmental risks and impacts associated with the construction phase. This plan must be adhered to at all times during the construction phase.

It is the responsibility of the contractor, in conjunction with EO and ECO, to educate, inform and foster a sound understanding of the CMP in all staff, sub-contractors, suppliers etc. Strict adherence to the CMP must be enforced and monitored.

An ‘Environmental Site Book’ should be supplied and kept on site. This site book should be in the form of a file and will house all environmental status reports as compiled by the ECO. All issues and proposed actions as noted by the ECO during site visits will also be documented in the site book. The EMPr, as well as, a copy of the environmental sensitivity plans and construction layout plan must be available onsite.

8.1 Pre-construction

To ensure that all construction staff and contractors are aware of what is expected of them in terms of conduct and environmental performance.

8.1.1 Planning and preparation

General mitigation:
• An independent Ecological Control Officer (ECO) must be appointed to oversee construction.
• A permanent Environmental Officer (EO) must be designated to monitor environmental compliance on a day-to-day basis on the construction site.
The ECO must be consulted to identify possible suitable construction site camps (to be verified by a qualified botanist).
Based on the ECO’s recommendations for preferred sites, the contractor must develop a plan of the operations of the construction site indicating the position of all construction activities, including but not limited to: offices, ablution facilities, storage areas, workshops, batching plant, stockpile areas, waste disposal facilities, hazardous substance storage area, access routes, etc. This layout plan is to be submitted to the ECO for acceptance prior to site establishment. Any changes to this plan will need to be reviewed in conjunction with the ECO.
The contractor must develop a plan indicating the mapped positions of vegetation specimens to be conserved and which should be removed and replaced.
The contractor must develop a management and monitoring programme for alien and invasive species detailing basic ID information, actions to prevent the establishment of invasive plants and methods of removal of site during construction.
The contractor must ensure that his construction staff is briefed as to the provisions of the EMPr.
An Environmental Awareness Plan must be presented before the commencement of any construction activities. All construction staff must be aware of the biodiversity importance of the area (pertaining to all development areas);
The contractor must comply at all times with the Occupational Health and Safety Act and implement an HIV/AIDS awareness programme for all construction workers at the outset of the construction phase.

Specialist mitigation:
The contractor must develop a Code of Conduct (based on the KNP Code of Conduct) to specify what types of behaviour and activities are and are not permitted by construction workers in a Protected Area. Both the applicant and the contractor should sign the Code of Conduct before the contractor moves onto site.
All workers are to be informed at the outset of the construction phase of the conditions contained in the Code of Conduct, specifically consequences relating to trespassing, stock theft and poaching.
The applicant should enter into an agreement with the affected landowners whereby the contractor will compensate farmers for any stock losses and/or damage to farm infrastructure that can be linked to construction workers. The agreement should also cover loses and costs associated with fires caused by construction workers or construction related activities (see below);
Construction workers that breach the code of good conduct should be disciplined / dismissed. All dismissals must comply with the South African labour legislation.

8.2 Site establishment

To ensure that the construction footprint is kept to a minimum in order to conserve and protect plant and animal species and habitat and to ensure that site facilities, structures and infrastructure do not impose on the surrounding environment

8.2.1 Site demarcation

General mitigation:
Minimize the construction footprint and where possible, restrict all construction related activities to previously disturbed areas or transformed vegetation.
A perimeter fence or suitable perimeter demarcation (such as steel droppers and hessian rope) must be erected around the construction works area to prevent access to adjacent bush and sensitive environs. Buffer areas and identified sensitive environments must be demarcated as No-go zones, where no construction activities or staff are permitted.
Demarcate vegetation specimens to be retained with danger tape and / or fencing as required. This barrier to be at least 2m from the stem of the specimen.
Establish and maintain site demarcations for the duration of the construction phase. Ensure that materials do not blow or move outside of the demarcation line.
• Prohibit vehicular or pedestrian access into all natural areas beyond the demarcated boundary of the construction site.
• Clearly indicate which activities are to take place in which areas within the site e.g. the mixing of cement, stockpiling of materials etc. Limit these activities to single sites wherever possible.

Specialist mitigation:
• A suitably experienced botanist should be present on site at the time of pegging so as to identify sensitive plants or habitats.
• The nationally protected trees to be protected (Aloe spicata, Sclerocarya birrea subsp. cafra, Combretum imberbe and Philenoptera violacea and any other identified subsequent to the initial survey) should be clearly marked prior to construction.
• Locate construction camps and stock yards in the least visible areas. Make use of the natural screening capacity of the site by placing these facilities adjacent a dense vegetation patch with sufficient height to conceal these project components. Alternatively, the screening capacity of the site can be temporarily enhanced through the erection of a 3 m high shade cloth fence around the construction camp during construction. The colour of the shade cloth should be similar to that of the adjacent vegetation, i.e. a light brown or green.

8.2.2 Accommodation

General mitigation:
• All staff need to be accommodated off-site and driven to site each day. No construction workers, with the exception of security personnel, should be permitted to stay overnight on the site.
• Staff can be transported in open vehicles, as long as the vehicles have built up sides, with a cover or roof of some sort.
• Designate an area for food preparation and consumption and ensure that facilities are available to properly store, prepare and consume food, as well as to wash up afterwards.
• Food and utensils must be properly stored away, and may not be left lying around.

Specialist mitigation:

8.2.3 Pollution control

General mitigation:
• The Contractor must take reasonable precautions to prevent the pollution of the ground and/or water resources on and adjacent to the site as a result of his activities.
• Install a drainage diversion system to divert clean runoff around areas of potential pollution, e.g. batching areas, workshops, etc.
• Direct polluted runoff and waste water emanating from the construction site into a collection system (e.g. sump, attenuation dam, PVC porta-ponds, etc.) for treatment or collection and disposal.
• Collected contaminated runoff/wastewater is to be pumped out of the final collection point and disposed of at an appropriate waste disposal site. Sump liners are to be treated in the same manner.
• Prevent polluted water from reaching the watercourses.
• Washing of plant/equipment/concreting equipment etc. may only be washed in dedicated areas and the dirty water is not allowed to discharge into a watercourse or surrounding natural vegetation.
• The Contractor is encouraged to recycle dirty wash water to minimise the amount to be removed off-site.
• No natural watercourse is to be used for the cleaning of tools or any other apparatus. This includes for purposes of bathing, or the washing of clothes etc.
• The Contractor may discharge ‘clean’ silt laden water overland and allow this water to filter into the ground. However, he shall ensure that he does not cause erosion as a result of any overland discharge.
• Trucks delivering concrete shall not be washed on site or anywhere inside the park.
Specialist mitigation:

8.2.4 Access roads

General mitigation:

- Formalize access roads and make use of existing roads and tracks where feasible, rather than creating new routes through naturally vegetated areas.
- Construction access roads should not be wider than necessary with a maximum width of 3m.
- Regulate and control movement over the site. Personnel, vehicles and equipment to move along designated routes only.
- The contractor must maintain all access and site roads and repair these as required. Damage caused to roads by the construction related activities, including heavy vehicles, must be repaired before the completion of the construction phase. The costs associated with the repair must be borne by the contractor.
- Upon completion of the construction period, the Contractor shall ensure that the access roads are returned to a state no worse than prior to construction commencing.
- All disturbed areas along the fringes of access roads must be rehabilitated once the road is complete.

Specialist mitigation:

- Road construction within the 1.5km avifaunal buffer zone should preferably not take place during the breeding season of sensitive avifaunal species (i.e. construction must take place during September - January).
- The width of access roads should be kept to a minimum and should be left un-surfaced (gravel).

8.2.5 Protection of flora

General mitigation:

- Vegetation disturbance and removal must be kept to a minimum and the areas monitored to ensure that areas are exposed for brief periods of time only.
- Construction activities must be carefully planned and implemented in such a way that facilitates and aids in the rehabilitation and establishment of plant communities.
- Progressively rehabilitate (rip, scarify and plant) areas as soon as works have been completed.
- Implement fines for the damage or destruction of marked and protected specimens. It is the contractor’s responsibility to ensure that these are retained.
- Do not mark or deface any natural feature.
- No large tree (with a trunk diameter exceeding 200mm) may be felled without the permission of the ECO.
- Consider the selective trimming of branches before opting to remove any trees.
- No material storage or laydown is permitted under trees.
- Remove only the vegetation where essential for construction and do not allow any disturbance to the adjoining natural vegetation cover. No vegetation outside of the demarcated construction areas may be removed whatsoever.
- Retain vegetation and soil within construction areas in position for as long as possible, removing it immediately ahead of construction / earthworks in that area.
- Workers may not tamper or remove flora and neither may anyone collect seed from the plants without permission from the local authority.
- Only wood from trees felled as part of the construction contract may be sold / made available for firewood. No dead wood may be gathered from the surrounding veld.
- Implement a Plant Rescue Plan for protected species within the construction areas. Where feasible, these should be removed by a suitably qualified specialist and replanted as part of vegetation rehabilitation plan.
Specialist mitigation:
- Protect all areas susceptible to erosion, particularly the sodic soil sites, and ensure that there is no undue soil erosion resultant from activities within and adjacent to the construction camp and work areas.
- No construction activities to take place within the buffered Adenium populations or any sodic soil patches. No translocation of plants from this area should be allowed; however, if other plants are uncovered during construction, then these should be relocated to the buffered zone.
- A suitably experienced botanist should be appointed to search the footprint of each accommodation unit and associated infrastructure at the Lodge Site prior to site clearance.
- The road re-alignment should also be walked and protected species searched for; these species should be avoided wherever possible and only as a last resort should relocation be considered (if it is possible to relocate the species).
- Any plant species of conservation concern (other than highly threatened species) or protected species located during these searches be relocated if possible to representative habitat as close as possible to the point of removal.

8.2.6 Protection of the riparian system

General mitigation:
- Do not create additional drainage line crossings without the express permission of the ECO. The ECO will ensure that the crossing is permitted in terms of DWA’s General Authorisations, Construction and rehabilitation of the crossing must be as per the ECO’s instruction.
- Construction within or near drainage lines should take place outside of the rainy season when the flow of the non-perennial rivers is at a minimum.
- Avoid the sealing of surfaces under a bridge or gabion construction.

Specialist mitigation:
- The road crossing should be placed in such a way so as to minimise disturbance to riparian vegetation, especially large older trees and sensitive species.
- Where avoidance or pruning of the nationally protected trees is not possible, pruning or removal of the trees can only be undertaken once a permit authorising the contractor to do so has been granted by the Department of Agriculture, Forestry and Fisheries (DAFF). The activity can only proceed, once the permit has been issued.

8.2.7 Protection of fauna

General mitigation:
- Ensure that construction personnel are briefed on the potential occurrence of protected faunal species, what they look like, and where they are likely to be found. Personnel are to be instructed that these species are not to be hurt or destroyed if encountered. This applies specifically to the snakes, lizards and spiders, as these are often perceived to be vermin and pests.
- Personnel must be instructed to report the presence of protected species to the contractor or EO so that arrangements may be made to relocate these to adjacent bush areas.
- Develop a procedure for dealing with animals encountered on the site, including dangerous animals and vermin. Where necessary, call in professionals to remove the animals.
- Personnel are to be instructed on the presence of dangerous game and the appropriate behaviour and safety upon encountering such game.
- Ensure that all personnel are aware of what the procedures for dealing with animals are. It is the contractor’s responsibility to ensure that proper procedures are followed.
- Pets and livestock are not allowed on site.
- No poaching or snaring of any game is permitted. The contractor must regularly undertake checks of the surrounding natural vegetation and along game paths to ensure no traps have been set. Remove and dispose of any snares or traps found on or adjacent to the site. The contractor must implement fines in this regard.
Specialist mitigation:

- The proposed activities should strive to promote connectivity between important habitat types (e.g. riparian woodland units pertaining to the road-re-alignment). Natural corridors must be retained where possible to promote movement of bird species, especially during the construction process.
- The Lodge accommodation units that line the Timfenheni Stream need to be sited carefully so that no canopy trees in the riparian zone are disturbed or destroyed during construction.
- The Saddle-billed Stork nest site along the Crocodile River downstream of the Lodge site should be checked prior to construction commencing in order to confirm whether the birds are breeding or not; If breeding birds are located, then construction activity should preferably take place between March to August in order to avoid disrupting the main part of the breeding period of this species.
- Large trees within the rest of the Lodge footprint, the road re-alignment and the Park-and-Ride area should be developed around rather than removed, wherever possible.
- Where possible, the dead trees (pertaining to the lodge area and road re-alignment) should be retained since they provide critical important breeding habitat for hole-nesting bird species.
- Where possible, large/canopy trees should be retained (pertaining to all development areas) since they provide critical important breeding habitat for bird species.
- Where possible, a "walk-down" of the proposed re-alignment should be commissioned prior to construction to confirm any active nesting/breeding of birds of prey along the proposed route (within 200m of the proposed road). It is possible that some of the large trees in the area could provide nesting opportunities for birds of prey prior to the construction phase - these areas should be marked and road construction should only commence in the vicinity of the nesting site after the fledgling has left the nest.
- SANParks staff should periodically search the natural bush in the general vicinity of the Lodge construction site in order to detect whether snaring is taking place.
- If alien ant species are discovered, steps should immediately be taken to exterminate said species. Monitor all material entering the proposed building site in its regard.
- The contractor should enter into an agreement with the Kruger National Park whereby the loss of wildlife during the construction phase will be compensated for. The agreement should be signed before the construction phase commences.
- The contractor must ensure that construction workers found guilty of poaching are dismissed and charged. All dismissals must be in accordance with South African labour legislation.

8.2.8 Protection of cultural heritage

General mitigation:

- All areas of cultural heritage importance/significance should be identified and mapped. These areas should be demarcated and appropriate buffers put in place.
- If archaeological or historical ‘chance finds’ are encountered, then work in the area must be halted, and a heritage specialist must be called to assess the situation and make recommendations.
- If any fossils are discovered during the construction then a palaeontologist must be called to assess their importance and rescue them if necessary.

Specialist mitigation:

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8.3 Materials management

*To ensure that waste management activities on site are undertaken in the correct manner and that staff are aware of the procedures*

8.3.1 Solid, liquid and hazardous waste

General mitigation:
As per Waste Management Plan (refer to section 10.2).

**Specialist mitigation:**

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8.3.2 Concrete and cement work

**General mitigation:**

- Ensure that concrete and cement works are undertaken in specified areas only.
- Ensure that all operations that involve the use of cement and concrete are carefully controlled. Water and slurry from concrete mixing operations must be contained to prevent pollution of the ground surrounding the mixing points.
- Use plastic trays or liners when mixing cement and concrete: Do not mix cement and concrete directly on the ground.
- Excess concrete from mixing must be deposited in a designated area awaiting removal to an approved landfill site.
- All visible remains of excess concrete shall be physically removed immediately and disposed of as waste. Washing the visible signs into the ground is not acceptable. All excess aggregate shall also be removed.

**Specialist mitigation:**

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8.3.3 Fuel and hazardous material

**General mitigation:**

- Provide the ECO with a list of all petroleum, chemical, harmful and hazardous substances and materials on site, together with storage, handling and disposal procedures for these materials.
- Ensure that all hazardous substances (chemicals, oils, etc.) are stored in appropriate, tamper proof containers in locked stores.
- Petroleum, chemical, harmful and hazardous materials must be stored in enclosed, bunded areas. The bunded areas shall be clearly marked.
- The bund must have a volume of 10% of the volume of the largest tank in the storage area plus 10% of the volume of all other tanks.
- The slab must be sloped towards a sump to enable any spilled fuel and water to be removed.
- Any wastewater collected at the sump shall be disposed of as hazardous waste.
- Ensure that all hazardous substances are used and handled by qualified personnel on bunded surfaces.
- Ensure that no oil, petrol, diesel etc. is discharged onto the ground.
- All hazardous products to be dispensed from 200 litre drums shall be transferred by pump, and not dispensed by tipping of the drum.
- Tanks containing fuel must have lids, which are to remain firmly shut.
- Gas and liquid fuel may not be stored in the same storage area.
- No smoking is allowed inside the stores or within 3m of a bund.
- The Contractor must ensure that there is adequate fire-fighting equipment at the fuel stores.
- Fuels and chemicals may not be stored under trees.
- Exercise extreme care with the handling of diesel and other toxic solvents so that spillage is minimised.

**Specialist mitigation:**

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8.4 Stockpiles, storage and handling
To ensure that all materials are handled and stored in the correct manner so as to protect the materials and the environment

General mitigation:
- Conserve topsoil through pre-emptive stripping and stockpiling prior to the commencement of works in any area, pending reapplication during rehabilitation.
- Strip topsoil together with grass / groundcover from all areas where permanent or temporary structures are located, construction related activities occur, and access roads are to be constructed.
- Topsoil is to be handled twice only - once to strip and stockpile, and secondly to replace, level, shape and scarify.
- Co-ordinate works to limit unnecessarily prolonged exposure of stripped areas and stockpiles. Retain vegetation and soil in position for as long as possible, removing it immediately ahead of construction / earthworks in that area.
- Do not strip topsoil when it is wet.
- Topsoil stockpiles must be positioned/ stored in approved locations only.
- Topsoil stockpiles may not exceed 2 m in height and should be protected from erosion
- Do not disturb, compact or disrupt topsoil stockpiles, and ensure that nothing is stored on them;
- Regular weeding of stockpiles must occur to ensure that no invasive or alien plant species are established.
- Topsoil stockpiled for extended periods of time must be revegetated with indigenous grasses.
- Topsoil is to be replaced along the contour.
- Topsoil is to be replaced by direct return where feasible (i.e. replaced immediately on the area where construction is complete), rather than stockpiling it for extended periods.

Specialist mitigation:

8.5 Erosion control

To reduce the erosive effects of surface water runoff on exposed soils

8.5.1 Water management

General mitigation:
- Monitor water consumption to ensure that there is no undue waste. Keep records of water monitoring and make these available to the ECO upon request.
- Ensure that consumption does not exceed permitted quantities. Take action to reduce consumption if necessary.
- Ensure that all construction personnel are trained in water wise principles, and that they practise prudent use of water during the construction phase.

Specialist mitigation:

8.5.2 Storm water management

General mitigation:
- As per the Storm Water Management Plan (refer to section 11.2).
Specialist mitigation:

8.5.3 Excavation, backfilling and trenching

General mitigation:

- Do not excavate until all required materials/services are on-site, to facilitate immediate laying of services/construction of subsurface infrastructure.
- In general, excavations remaining open overnight must be fenced or equipped with escape ramps to allow trapped animals to escape.
- Preferably undertake clearing activities during the dry season in order to prevent erosion and siltation.
- Excavation of sand to solid ground to be done carefully and appropriate drainage incorporated i.e. sand and debris need to be removed and solid rock preferably exposed to ensure proper binding with concrete material.
- Construction must preferably be extended over rocky substrate to give maximum anchoring opportunity.
- Progressively reinstate of disturbed areas to topsoil profile on an on-going basis, immediately after selected construction activities (e.g. backfilling of a trench) are completed. This allows for passive rehabilitation (i.e. natural re-colonisation by vegetation) to commence.
- Deficiency of backfill material shall not be made up by excavation within the protected area.
- Excavated material is to be stockpiled along a pipeline trench within the working servitude, unless otherwise authorised.
- Subsoil backfill to be followed by topsoil. Compact backfilled trenches to prevent erosion. Subsoil to be compacted to engineer’s specification.
- Consider using any excess rocks and boulders that were excavated from the construction site for any erosion protection work, which is required on site. Consider removing the rocks for the packing of gabions at other soil erosion sites.
- Removed soil is to be used to backfill areas where required and excess is to be landscaped into natural looking banks that fit the surrounding topography.
- Monitor backfilled areas for erosion and remediate as required.
- Progressively rehabilitate (rip, scarify and plant) areas as soon as works have been completed

Specialist mitigation:

8.5.4 Borrow pits

General mitigation:

- KNP borrow pits may only be utilised with the express permission of SANParks, the Section Ranger, EO and ECO.
- The extent of the existing borrow areas & haul roads may not to be increased without the approval of the Section Ranger, EO and ECO.
- Topsoil must be stockpiled separately for rehabilitation work (stored in heaps 2m high & 1:3 slope).
- Do not disturb large trees (>200mm diameter). Protect drip lines with 2m buffer.
- Do not strip soils when wet (leads to compaction and loss of soil structure).
- Surface water deflection berms must be constructed upslope of excavation as required.
- Excavation to follow progressive reinstatement (strip & replace topsoil systematically).
- Return surplus material, rock & appropriate building rubble to pit to aid rehabilitation.
- EO to ensure access point to the borrow pit site is closed when not in use.
- Facilitate drainage where possible, energy dissipation measures are to be installed where required.
- When borrowing is complete, rip and scarify active slopes ad haul road along the contour and spread topsoil. Pack branches to aid in rehabilitation.
- Rehabilitation must be finished off with final slopes to 1:3 -1:2 maximum gradient.
• A letter of compliance is required from the KNP approving finishing-off / rehabilitation.

**Specialist mitigation:**

8.6 **Alien plant control**

*To prevent the spread and establishment of alien invasive plant species owing to exposed soils.*

**General mitigation:**

- Alien invasive species within the site should be removed prior to construction-related soil disturbances.
- All sites disturbed by construction activities must be monitored for colonization by invasive alien plant species.
- All alien seedlings and saplings must be removed as they emerge or become evident for the duration of construction.
- Manual / mechanical removal is preferred to chemical control.
- Follow manufacturer’s instruction when using chemical methods, especially in terms of quantities, time of application etc.
- Ensure that only properly trained people handle and make use of chemicals.
- Limit herbicide and pesticide use to non-persistent, immobile products and apply in accordance with label and application permit directions and stipulations for terrestrial and aquatic applications.
- All construction vehicles and equipment, as well as, construction material should be free of plant material. Therefore, all equipment and vehicles should be thoroughly cleaned prior to access to Park.

**Specialist mitigation:**

- Management measures to eradicate and control alien plants need to be informed by the Park’s invasive species management program.
- Alien invasive species that were identified, within the site, such as *Zinnia Peruviana*, *Ricinus communis*, *Ageratum houstonianum*, *Xanthium strumarium*, *Argemone Mexicana* and *Datura stramonium* should be removed prior to construction-related soil disturbances. By removing these species, the spread of seeds will be prevented into disturbed soils which could thus have a positive impact on the surrounding natural vegetation.
- Undertake yearly removal of aliens within the area (done in summer) until equilibration is reached. This may take several years. Methods for removal should comply with KNP policy and both the lodge and road crossing sites should be monitored annually in summer by a vegetation specialist to make sure alien species are under control.
- Replace topsoil of any areas denuded of topsoil and removal of all alien species (perennial and annual) at sites disturbed or cleared by construction activities. Care should be taken not to introduce additional seed or propagules of alien species that may be present in aggregates brought to site.

8.7 **Vehicles and equipment management**

*To ensure that all construction vehicles and equipment are in good working order and condition*

**General mitigation:**

- Maintain site vehicles and equipment in an acceptable state of repair. All vehicles must be road-worthy and regularly serviced.
- All road rules and speed limits must be adhered to at all times.
- Construction staff should only use authorised paths and roads.
- All drivers employed during the construction phase must be briefed and notified of the potential safety risks posed by construction vehicles to members of the local community.
• Regularly check vehicles, machinery and equipment operating on site to ensure that none have leaks or cause spills of oil, diesel, grease or hydraulic fluid.
• Construction vehicles are to be maintained in an acceptable state of cleanliness when leaving site. Sand, dust and spillages from these vehicles that inevitably fall on the main roads should be cleared on a regular basis.
• Construction vehicles transporting materials to and from the construction site must be covered to reduce the formation of dust.
• Ensure that the maintenance of all vehicles and equipment, including oil and lubricant changes, takes place only within properly equipped, bunded maintenance areas or workshops.
• Pumps and other machinery requiring oil, diesel etc., which are to remain in one position for longer than two days shall be placed on drip trays. The drip trays shall be watertight and shall be emptied regularly and the contaminated water disposed off-site at a facility capable of handling such waste liquid. Drip trays shall be cleaned before any possible rain events that may result in the drip trays overflowing.
• Movement of heavy vehicles and machinery to be limited wherever possible, and construction noise reduced wherever possible.
• Contactors will be required to submit a delivery timetable. Strict control is to be exercised over entering and exiting traffic and delivery procedures.
• Vehicles used during construction or to transport material or staff on site, should have the minimum impact on the environment (trees, roads or other) or other road users. The size, height and weight of vehicles must be kept in mind; the access route will determine the type of vehicle that can be used.
• Adjacent landowners must be given due warning ahead of any particularly loud construction works.

Specialist mitigation:
• All vehicles leaving and entering the site should be searched on a daily basis by staff from Kruger National Park for poached fauna and flora.
• All drivers must be qualified and made aware of the potential road safety issues and need for strict speed limits (50km on surfaced road and 40km on gravel road in the Kruger National Park).
• All vehicles must be fitted with a GPS tracking device to monitor speeds and routes. Fines must be issued in the event of a violation.
• The movement of heavy vehicles associated with the construction phase should be timed to avoid holiday periods, long weekends and weekends when visitors to the Kruger National Park tourists are more likely to use the S114 and S121.
• The movement of heavy vehicles associated with the construction phase should be planned to avoid times when visitors to the Kruger National Park are more likely to likely to use the S114 and S121, such as early mornings and late afternoons. The gates in the Kruger National Park open at 05.30 and 06:00 in summer and winter respectively. The movement of heavy construction vehicles accessing the site should be timed to enter the Malelane gate at 08:00 so to reduce the potential impact on visitors on early morning game drives. In the afternoons the gates close at 18:30 and 17:30 in in summer and winter respectively. The movement of heavy construction vehicles leaving the site should be timed to exit the Malelane Gate at 16h00 so to reduce the potential impact on visitors on late afternoon game drives.

8.8 Socio-economic management

To ensure community beneficiation via job creation and skills transfer and to mitigate the visual and noise impact of the construction works

8.8.1 Staff

General mitigation:
• Implement a policy that no employment will be available at the gate.
• The movement of construction workers on and off the site should be closely managed and monitored by the contractor. In this regard the contractor is responsible for making the necessary arrangements for
transporting workers to and from site on a daily basis, specifically construction workers who are not from the local municipality.

- The contractor must make the necessary arrangements for allowing workers from outside the area to return home over weekends. This would reduce the risk posed by construction workers to local family structures and social networks.

**Specialist mitigation:**

- Where feasible, training and skills development programmes for locals should be run throughout the construction period.
- The recruitment selection process should seek to promote gender equality and the employment of women wherever possible.

### 8.8.2 Visual

**General mitigation:**

- Reduce the construction period through careful logistical planning and productive implementation of resources.
- Restrict construction activities to daylight hours in order to negate or reduce the visual impacts associated with lighting. No after hours construction work or work on weekends or public holidays is permitted.
- A dust abatement programme should be used. Standard dust abatement measures include watering or otherwise stabilising soils, covering haul trucks, employing speed limits on unpaved roads, minimising vegetation clearing, and promptly re-vegetated after construction is completed.
- Vegetate or cover long-term stockpiles of soil and fine spoil material to minimise the sources of dust pollution.
- Rehabilitate all disturbed areas, construction areas, roads, slopes etc. immediately after the completion of construction works.

**Specialist mitigation:**

- Dust suppression measures must be implemented such as wetting of the site and access roads on a regular basis and ensuring that vehicles used to transport sand and building materials are fitted with tarpaulins or covers.
- Consider temporarily closing sections of the S114 and S121 from public access during construction. This will prevent sensitive viewers from being exposed to the construction processes.
- Implement rehabilitation of the S114 road verges as soon as possible in order to limit the potential for erosion.
- Implement landscaping / rehabilitation at the Park-and-Ride as soon as possible, even during construction.

### 8.9 Fire management

*To safeguard and protect the environment from any potential fire hazards*

**General mitigation:**

- As per the Fire Protection Management Plan (refer to section 12.1).

**Specialist mitigation:**

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8.10. Rehabilitation

To ensure that the site is restored to its natural state prior to any construction activities

General mitigation:
- Rehabilitation must be implemented immediately upon completion of construction.
- After construction, the land must be cleared of rubbish, surplus materials, and equipment, and all parts of the land must be left in a condition as close as possible to that prior to construction.
- Excess topsoil is to be spread evenly over the area in a manner that blends in with the natural topography.
- Excess stockpiled building material is to be removed completely and the areas levelled.
- All disturbed areas must be levelled and cleared of any foreign material. It is unacceptable to leave foreign material behind with the knowledge that it will become hidden amongst the rejuvenating vegetation with time.
- Construction areas, disturbed sites and obsolete roads should be rehabilitated by breaking the surface crust and erecting earth embankments to prevent erosion, while vegetation should be re-established.
- Ensure that the construction site is rehabilitated using appropriate indigenous vegetation. Salvaged vegetation, rather than new planting or seeding, should be used to the extent possible.
- Specifications for soil preparation, endemic plant/seed mixes, fertilizer, and mulching should be provided for all areas disturbed by construction activities.
- With the permission of the local authority, seed from appropriate indigenous species may be harvested for later use during rehabilitation. An ecologist should be consulted in this regard.
- Plants that are removed / propagated during construction may be maintained on site and used to re-vegetate the disturbed soil.
- All harvested seeds and seedlings, as well as plants removed for transplanting which are not immediately re-planted, are the responsibility of the Contractor and must be kept under approved nursery conditions.
- Cordon off rehabilitated areas and do not allow grazing or access into these areas until such time that re-vegetation was found to be successful.
- Rehabilitated areas must be monitored regularly to ensure that revegetation is successful, plants are maintained, weeds and invaders are removed, and that areas where replanting is unsuccessful are replaced.

Specialist mitigation:
- All rehabilitation should make use of indigenous plant species, and preferably of species native to the study area and immediate surroundings. The species selected should strive to represent habitat types typical of the ecological landscape prior to construction (pertaining to the lodge site and 'Park - and - Ride' facility).

9. OPERATIONAL MANAGEMENT PLAN

The Operational Management Plan (OMP) identifies and addresses the environmental risks and impacts associated with the day-to-day operation of the development. This plan must be adhered to at all times during the operational phase.

It is the Operators responsibility to ensure the implementation of all mitigation measures contained in the OMP in order to prevent/minimize the environmental impacts associated with the operations.
9.1 **Biodiversity management**

*To ensure the continued integrity of the natural environment and the conservation of fauna and flora, particularly in rehabilitated areas.*

9.1.1 Access roads

**General mitigation:**
- Regulate and control movement over the site. Personnel, vehicles and equipment to move along designated routes.
- Maintain all roads in good condition to prevent dust and erosion.
- Runoff from roads must be managed to avoid erosion and pollution problems.
- No drainage line crossings may be developed without the express permission of DWA.
- The internal road network should be maintained as gravel tracks that allow for faunal dispersal and minimize fragmentation of ecologically sensitive areas.

**Specialist mitigation:**
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9.1.2 Resource management

**General mitigation:**
- Monitor water consumption to ensure that there is no undue waste. Keep up to date records of water monitoring and make these available to the ECO upon request.
- Ensure that consumption does not exceed permitted quantities. Take action to reduce consumption if necessary.
- Total water extraction will be limited to the KNP policy for concessionaires.
- Install a leak detection system, and promptly attend to leaks as required.
- Undertake monthly potable water monitoring to ensure that the output quality of the water complies with the minimum standards as prescribed by DWA. Ensure that these records are kept up to date and are available upon request.
- Ensure that the Water Use license for the property is in place and up to date.
- Ensure that all facility staff is trained in water wise principles, and that they practise prudent use of water at all times.
- Post a Code of Conduct in guest rooms and other relevant areas and / or distribute a flier advising guests of relevant Park rules and regulations (as per the PPP Agreements).

9.1.3 Protection of flora

**General mitigation:**
- Ensure that all conserved species and specimens are suitably protected for the duration of the operational phase.
- No protected trees or plants may be removed without the relevant permits from the local authority.
- Implement fines for the damage or destruction of marked and protected specimens.
- Guests and staff may not tamper or remove flora and neither may anyone collect seed from the plants without permission from the local authority.
- The picking of flowers or removal of plants should be prohibited in the Guest Rules.
- No bush clearing is allowed, either to enhance game viewing, for firewood or for any other purpose.
- Maintenance workers and guests may not trample natural vegetation and work should be restricted to dedicated roads, paths and gardens within the development footprint.
- No unauthorised access is permitted to buffer areas or any natural areas outside of the facility footprint.
DRAFT ENVIRONMENTAL MANAGEMENT PROGRAMME

- No wood may be collected for firewood or any other purpose.
- No large tree (with a stem diameter exceeding 200mm) may be felled without the permission of the ECO.

Specialist mitigation:
- Guests and staff should be provided with information explaining different types of vegetation and sensitive species and why disturbance should be avoided, as well as rules regarding commuting. KNP policy and rules should not be disregarded or violated e.g. no person shall pick, disturb, remove or destroy and plant.
- Lodge management need to keep their staff aware that moving outside of the lodge site into natural bush is strictly forbidden and disciplinary action should be taken against staff that do so.
- All staff need to be accommodated off-site and driven to site each day.

9.1.4 Alien plant control

General mitigation:
- The operator must develop a management and monitoring programme for alien and invasive species detailing basic ID information, actions to prevent the establishment of invasive plants and methods of removal of site during construction.
- Monitor all sites disturbed by construction activities for colonisation by exotics or invasive plants and control these as they emerge.
- Manual / mechanical removal is preferred to chemical control.
- Follow manufacturer’s instruction when using chemical methods, especially in terms of quantities, time of application etc.
- Ensure that only properly trained people handle and make use of chemicals.
- Limit herbicide and pesticide use to non-persistent, immobile products and apply in accordance with label and application permit directions and stipulations for terrestrial and aquatic applications.

Specialist mitigation:
- Management measures to eradicate and control alien plants need to be informed by the Park’s invasive species management program.
- Grounds staff should be trained to recognize and eradicate potential invasive plants.
- All areas of bare soil in the vicinity of the Lodge site and Park-and-Ride area need to be regularly checked for the presence of invasive alien plants by these trained staff.
- Undertake yearly removal of aliens within the area (done in summer) until equilibration is reached. This may take several years. Methods for removal should comply with KNP policy and both the lodge and road crossing sites should be monitored annually in summer by a vegetation specialist to make sure alien species are under control. Monitoring and removal should occur for at least 5 years post development.

9.1.5 Protection of fauna

General mitigation:
- The development should maintain connectivity between ecologically important habitats by retaining natural corridors for the movement of fauna.
- No unauthorised access is permitted to buffer areas or any natural areas outside of the facility footprint.
- Maintain a game / security fence or suitable equivalent around the perimeter of the facility. This fence should, however, be designed to allow access by small mammals, tortoises etc.
- Ensure that personnel are briefed on the potential occurrence of protected faunal species, what they look like, and where they are likely to be found. Personnel are to be instructed that these species are not to be hurt or destroyed if encountered. This applies specifically to the snakes, lizards and spiders, as these are often perceived to be vermin and pests.
Personnel must be instructed to report the presence of protected species to the contractor or EO so that arrangements may be made to relocate these to adjacent bush areas.

Develop a procedure for dealing with animals encountered on the site, including dangerous animals and vermin. Where necessary, call in professionals to remove the animals.

Ensure that all personnel are aware of what the procedures for dealing with animals are. It is the operator’s responsibility to ensure that proper procedures are followed.

Pets and livestock are not allowed on site.

No poaching or snaring of any game is permitted. The operator must implement fines in this regard.

Specialist mitigation:

SANParks staff should periodically search the natural bush in the general vicinity of the Lodge site in order to detect whether snaring is taking place.

If an ant colony is noted during the operational phase of the proposed project, a suitably qualified opinion should be sought as to whether it is an invasive colony, and if yes, it must be exterminated immediately.

Yellow light bulbs should be utilized as they attract fewer insects and arachnids.

Lights should be of longer wave lengths (550nm) and should contain preferably green or blue hues. Outside lighting should not make use of fluorescent lights since these emit significant amounts of UV, which will attract invertebrates and possibly also birds.

Internal lights should be shielded by blinds/curtains.

No feeding of any animals is permitted anywhere.

Noise should be kept to a minimum at night (pertaining to the lodge site);

Domestic waste should be appropriately covered to reduce the risk of colonization by bird species (e.g. Pied Crows *Corvus albus*) with superior competitive abilities.

9.2 Materials management

To ensure proper waste storing, handling and disposal of materials and waste

9.2.1 Solid, liquid and hazardous waste

General mitigation:

- As per the Waste management Plan (refer to section 10.3)

Specialist mitigation:

9.2.2 Fuel and hazardous material

General mitigation:

- Ensure that all hazardous substances (chemicals, oils, etc.) are stored in appropriate, tamper proof containers in locked stores.
- Petroleum, chemical, harmful and hazardous materials must be stored in enclosed, bunded areas. The bunded areas shall be clearly marked.
- The bund must have a volume of 10% of the volume of the largest tank in the storage area plus 10% of the volume of all other tanks.
- The slab must be sloped towards a sump to enable any spilled fuel and water to be removed.
- Any wastewaterr collected at the sump shall be disposed of as hazardous waste.
- Ensure that all hazardous substances are used and handled by qualified personnel on bunded surfaces.
- Ensure that no oil, petrol, diesel etc. is discharged onto the ground.
- All hazardous products to be dispensed from 200 litre drums shall be transferred by pump, and not dispensed by tipping of the drum.
DRAFT ENVIRONMENTAL MANAGEMENT PROGRAMME

- Tanks containing fuel must have lids, which are to remain firmly shut.
- Gas and liquid fuel may not be stored in the same storage area.
- No smoking is allowed inside the stores or within 3m of a bund.
- The Contractor must ensure that there is adequate fire-fighting equipment at the fuel stores.
- Fuels and chemicals may not be stored under trees.
- Exercise extreme care with the handling of diesel and other toxic solvents so that spillage is minimised.

Specialist mitigation:

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9.3 Erosion control

To ensure that areas cleared of vegetation are protected and allowed to restabilize

General mitigation:

- As per the Storm Water Management Plan (refer to section 11.1).

Specialist mitigation:

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9.4 Vehicles and equipment management

To maintain air quality standards and limit soil and water contamination and pollution

General mitigation:

- Maintain site vehicles and equipment in an acceptable state of repair.
- Personnel, vehicles and equipment to move along designated routes.
- No off-road driving is permitted.
- Speed control measures must be implemented on site and in the surrounding area to reduce air pollution and animal mortality.
- Maintenance activities should be limited to daylight hours and vehicles should remain on the designated roads at all times.
- Carpools and lift clubs must be encouraged and staff picked up at a central point. Staff must not be discouraged from travelling to site in private vehicles.

Specialist mitigation:

- All vehicles must be road-worthy and drivers must be qualified and made aware of the potential road safety issues and need for strict speed limits (50km on surfaced road and 40km on gravel road in the Kruger National Park).
- Shuttles used to transfer guest to hotel from the Park and Ride facility must be fitted with GPS units to monitor speed, routes and times.
- The registration number and name of the driver and passengers of all cars entering the Kruger National Park after normal operating hours must be recorded;
- Only guests with confirmed bookings at the Malelane Safari Lodge should be permitted to access the Kruger National Park after normal park hours.
- Any driving along the roads at night needs to be limited to transfers as far as possible and unnecessary driving should be avoided.
- Staff vehicles need to be fitted with GPS systems that log their routes and driving speeds so that Lodge management and SANParks can monitor any night driving taking place and discipline staff who are speeding.
9.5 Socio-economic management

To mitigate the socio-economic impacts associated with the operation of the facility, specifically pertaining to visual and noise impacts

9.5.1 Staff management

General mitigation:
- The operator is responsible for making the necessary arrangements for transporting staff to and from site on a daily basis.
- Where reasonable and practical, the Operator should appoint local employees and implement a ‘locals first’ policy, especially for semi and low-skilled job categories.
- Where feasible, efforts should be made to employ local employees that are compliant with Black Economic Empowerment (BEE) criteria.
- Where feasible, training and skills development programmes for locals should be initiated and maintained throughout the operational phase.
- The recruitment selection process should seek to promote gender equality and the employment of women wherever possible.
- Clear criteria for identifying and funding projects and initiatives should be identified. The criteria should be aimed at maximising the benefits for the community as a whole and not individuals within the community.

Specialist mitigation:
- The operator of the facility should implement a training and skills development programme for locals during the first 5 years of the operational phase. The aim of the programme should be to maximise the number of South African’s and locals employed during the operational phase of the project.
- Clear criteria for identifying and funding projects and initiatives should be identified. The criteria should be aimed at maximising the benefits for the community as a whole and not individuals within the community;
- Strict financial management controls, including annual audits, should be instituted to manage the Community Trust.
- Developers should confirm in writing that they will not interfere in the activities of local sugarcane farmers whose plantations are located in the vicinity of the proposed Malelane Safari Lodge.
- Visitors to the lodge should also be informed that the areas on the southern bank of the Crocodile River are operating commercial farms.
- The operators of the lodge should also consider the establishment of a forum with the local commercial farmer in the vicinity of the lodge to discuss any issues that may arise.

9.5.2 24-Hour access

General mitigation:
- The lodge may accommodate a maximum of 240 at the lodge at any time. This includes both staff and guests.

Specialist mitigation:
- Shuttles used to transfer guest to hotel from the Park and Ride facility must be fitted with GPS units to monitor routes and times.
- The registration number and name of the driver and passengers of all cars entering the Kruger National Park after normal operating hours must be recorded;
- Only guests with confirmed bookings at the Malelane Safari Lodge should be permitted to access the Kruger National Park after normal park hours.
- As recommended by SANParks, access should be limited up until 22h00.
• Access for guests after 22h00 will be by exception, and is reserved for emergency situations or situations beyond control of the guest.
• Only guests with pre-bookings confirmed before Park closing time will be permitted to access the lodge after 22h00. Guests wishing to access the lodge after 22h00 must notify the lodge before Park closing time that they will be arriving after 22h00 so that arrangements can be made for their collection. This will reduce the risk of guests taking advantage of the 24 hour access facility provided for the hotel.
• Non-guests attending functions (conferences etc.) at the hotel should be required to leave the Kruger National Park by 22h00. This will assist to mitigate the noise and light impacts associated with cars leaving the Kruger National Park and crossing the Malelane Bridge after normal park hours.
• No access to the lodge after normal park hours should be provided via the S114, although the occasional game drive may be permitted. After hour access to the lodge should be confined to the H3 – S121 route¹. This will avoid light and noise impacts associated with shuttles for residents of Leopard Creek.
• The gate on the southern side of the Malelane Bridge should continue to be operated according to existing park hours. The gate should be automated and up-graded to include the installation of an intercom system linked to the lodge and the Park and Ride facility. Once the details of the guest/s have been confirmed the gate can be opened automatically to allow guests to drive over the Malelane Bridge and access the Park and Ride. This will prevent non-guests from accessing the bridge after normal park hours.
• No music (car radios etc.) should be permitted at the Park and Ride facility.

9.5.3 Visual impact management

General mitigation:
• Retain and maintain natural vegetation in all areas outside of the development footprint.
• Maintain the general appearance of the facility as a whole, including roads and servitudes.

Specialist mitigation:
• Monitor the effectiveness of the screen planting continuously in order to maintain its mitigation function.
• Implement a "no high-beam zone" for motorists at the entrance and exit of the Park-and-Ride facility in order to limit the potential for light trespass.
• After fitting the PV arrays at the lodge and service centre, monitor the potential for glare during the months of the year when the sun angle is low, i.e. during early mornings and late afternoons. A suitably qualified specialist should be appointed to undertake such monitoring.
• Do an on-site visibility test after completion of construction to determine the affect of outdoor lighting on night-drive routes and to make adjustment to light sources if required.

9.6 Fire management

To prevent any unplanned and uncontrolled fires from occurring

General mitigation:
• As per the Fire Protection Management Plan (refer to section 12.2).

Specialist mitigation:
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¹ Emergency vehicles are obviously excluded from this provision.
SECTION C: SPECIAL MANAGEMENT PLANS

10. WASTE MANAGEMENT PLAN

A Waste Management Plan (WMP) outlines measures and procedures for the appropriate handling, storage and disposal of wastes generated during the entire project lifecycle (pre-construction, construction and operational phases).

The objectives of the WMP are to:

- Formalise waste handling, transfer and disposal activities associated with waste from the resort;
- To prevent inappropriate management of waste and associated risk of pollution of the environment;
- To facilitate waste minimisation entailing avoidance, reduction, reuse, recycling or treatment before disposal;
- To streamline waste segregation, storage, and disposal and promote resource recovery from waste;
- To contain, control and dispose of waste in accordance with the required waste management practices (e.g. waste segregation);
- To define responsibility for waste management at the various levels of operation associated with resort;
- To provide a framework for the selection of waste management service providers in line with cradle to grave principles.
- To provide actions and guidelines to ensure that waste management is undertaken in line with:
  - SANParks Environmental Guidelines for Private Parties for the Construction and Operation of PPP Facilities;
  - Existing South African waste management legislation, waste management guidelines and policies; and international best practise (Waste Hierarchy).

In accordance with international trends, the management of all waste streams that will be generated at the lodge should demonstrate support for the Hierarchy of Waste Management (HWM), which aims to promote the re-use and recycling of wastes, giving effect to the concept of ‘cradle-to-cradle’ waste management. The aim of the Waste Management Plan is to minimize the amount of waste disposed of, and as such, a waste hierarchy is followed: Prevent, Minimise, Reuse, Recycle, Recover and then Dispose.

As this section forms part of the EMPr, the overall responsibility of ensuring compliance with the Waste Management Plan ultimately lies with the Applicant.

The sections below summarise the recommendations made in the Waste Management Plan contained in Appendix C of the BAR.

10.1 Planning Phase

10.1.1 Permits and permissions

- In order to comply with legislation, the following storage volumes may not be exceeded without a Waste Management License
  - General Waste: - 100 m³
  - Hazardous Waste: - 35 m³
- Finalise agreements and programmes with the Local Municipality regarding the disposal of domestic waste at the nearest landfill.
10.1.2 Temporary waste storage areas

- The gradient of the floors of the storage areas and the gradient of any associated access ramps are to be sufficiently level so that access for the purpose of emptying containers.
- The floor must be appropriately graded so that any water is directed to a central collection point / drainage connection.
- Durable walls/fences must extend to the height of any containers kept within so as to enclose the storage area.
- Doors/gates to the storage area to be able to open from both inside and outside the storage area and wide enough to allow for easy passage of waste/recycling containers;
- A hot and cold water supply must be provided through a centralized mixing valve for washing purposes. The hose cock must be protected from the waste containers and must be located in a position that is easily accessible when the area is filled with waste containers.
- Clear signage that clearly describes the types of materials that can be deposited into recycling bins and general garbage bins.
- Convenient access from each operational area of the resort to the waste/recycling storage area(s) and step free access between the point at which bins are collected/emptied and the waste/recycling storage area(s).
- Allow access by collection vehicles used by the nominated contractor (collection vehicles should be travelling in a forward direction at all times while servicing bins). The access driveways to be used of sufficient strength to support such vehicles.
- A designated area should be provided for the storage of hazardous waste. The hazardous waste storage area should comply with the following requirements:
  - The storage area should be situated within an impermeable bund capable of containing 110% of the total volume of waste stored at any given time. One side of the bund should comprise a ramp to allow vehicular access if required.
  - The storage area should be clearly signposted as [HAZARDOUS WASTE], the capacity of the bund storage area as well as the PPE that should be used when handling hazardous waste.

10.2 Construction Phase

10.2.1 Good management practices

- Ensure that all personnel are familiar with waste management requirements on site;
- An adequate number of ‘scavenger proof’ refuse bins must be provided at the construction sites. Receptacles must be equipped with a closing mechanism to prevent their contents from blowing out and from scavenging animals.
- Ensure that personnel make use of the receptacles provided;
- Empty receptacles for disposal at least once per week, but more often if required;
- Ensure that rubble, litter, and disused construction materials are appropriately stored (if not removed daily) and then disposed regularly at licensed waste facilities.
- If there is a shortage of space and not enough room for multiple skips the principal contractor should employ a licensed waste management company to deal with waste,
- Onsite recycling containers and/or areas must be clearly marked.
- The working areas and storage sites must be cleared of litter on daily basis. The contractor will maintain ‘good housekeeping’ practises as ensure that all work sites and construction camp are kept tidy and litter free.
- Dispose of solid waste at the nearest, applicable licensed recycling centre, salvage yard or landfill site;
- All waste must be transported in an appropriate manner (e.g. plastic rubbish bags) to the approved waste site.
- The contactor or may not dispose of any waste and / or construction debris by burning, or by burying.
• Safe disposal waybills for all waste and material loads removed from the site must be kept on file.
• Complete waste transfer notes before any waste leaves the site
• Ensure all waste service providers have a valid waste carriers registration certificate,

10.2.2 Non-hazardous construction waste

• Segregate different types of waste as they are generated using different skips where possible (General wastes, non-hazardous wastes and hazardous wastes). At a minimum there should be skips for wood, metals, inert and mixed materials.
• Collect maintenance and domestic refuse (scrap metal, packaging materials etc.) in appropriate bins for recycling or send to landfill for disposal in an approved manner.
• Recycle suitable spoil, demolition materials, pruning’s, and surplus construction material arising from the works on site to avoid the need to transport materials.
• Metal waste has commercial value and is to be sold on to a scrap metal contractor for recycling purposes.
• Wood waste includes oversized cable reels, wooden packaging boxes, palettes and other wood materials. Palettes in good condition may be reused and are to be returned to materials suppliers on a return system – this will need to be negotiated with the relevant suppliers. Damaged wood waste is to be donated to local communities.

10.2.3 Hazardous construction waste

Hazardous waste can be defined as waste, which can, even in low concentrations, have significant adverse effects on public health and/or the environment.

• The disposal of hazardous waste must comply with all relevant Regulations, Norms and Standards pertaining to waste classification in order to ensure disposal at the correct landfill class.
• Avoid the generation of hazardous waste wherever possible through procurement processes e.g. purchasing of less toxic / environmentally friendly products.
• Petroleum, chemical, harmful and hazardous waste must be stored in enclosed, bunded areas. The bunded areas shall be clearly marked. Such waste shall be disposed of off-site at a licensed hazardous waste disposal site.
• Forecast and prevent potential situations in which accidents and spills can mitigate against unwarranted waste emissions.
• Hazardous waste may be temporarily stored on site in vessels equipped with secondary containment structures to prevent contamination of soil, groundwater and surface waters due to accidental spills or releases.
• Hazardous waste must be separated at source from the general waste stream. Where possible, all hazardous wastes, including hydrocarbon wastes such as oils, should be recycled either by a recognized recycling company or returned to the supplier.
• All hazardous wastes that cannot be reused or recycled should be labelled correctly and stored in the designated waste storage area until collected for correct disposal.
• Load and unload any solid hazardous materials in a manner that reduces potential spills.
• Ensure that a spills containment kit is available on site and that personnel are trained in spills clean up procedures.
• No spills may be hosed down into a storm water drain or sewer, or into the surrounding natural environment.
• Immediately clean leaks and spills of hazardous substances and dispose of as hazardous waste. The EO and ECO should be notified immediately if a hazardous waste spill occurs, to ensure proper clean-up and disposal.
• Any contaminated soil / substrate must be removed and stored in a skip until it can be disposed of at a permitted disposal site.
• Report major spills to the regional DWA office.
Hazardous waste disposal must be undertaken by an approved waste contractor, and waste must be disposed of at a permitted hazardous waste disposal facility on a regular basis (H:H or H:h – landfill operator to be contacted for verification). Ensure that all transportation and disposal / recovery permits and licenses are held by the service provider.

All hazardous waste transported from the site must be reconciled with safe disposal certificates to be issued by the waste management service provider. These should be kept on file for inspection by the environmental authorities if required.

10.2.4 Sewage and effluent

- Ensure that sufficient numbers of mobile toilets are available on site and that these are located beyond the buffer zones.
- The location of chemical toilets or soak aways should be at least 100m from the boundary of any riparian zone and 500m from any wetland.
- Ensure that mobile toilets are maintained in a sanitary and operational state. Service slips need to be kept on file for verification.
- Waste from ablution facilities must be regularly removed and care must be taken to ensure that there is no spillage.

10.3 Operational Phase

10.3.1 Waste management areas

- Waste must be transported from the point of generation directly to the centralised waste storage area where it can be safely stored prior to offsite disposal.
- It is permissible to establish intermediate storage areas / collection points. All such areas would have to comply with safe storage requirements.
- The lodge must obtain consent / confirmation from TSB (or similar) to dispose their non-recyclable waste at the TSB facility.
- Duty of care obligations should be adopted and enforced, meaning that only reputable waste transport companies and permitted waste disposal facilities are used.
- Recordkeeping of the waste types and quantities must be as accurate as possible. Landfill waybills must be obtained and kept on file.
- Arrangements must be in place for the regular maintenance and cleaning of waste/recycling storage areas.

10.3.2 Landscape and kitchen waste

- Avoid purchasing unnecessarily large amounts of fresh produce or other food products, which cannot be frozen or preserved.
- Develop a comprehensive system for waste separation at the relevant generation points.
- Separate waste into items, which can be reused, composted, or recycled, and send the remaining portion to the general waste stream for disposal at landfill.

10.3.3 General waste

- Adopt waste reduction procurement philosophy, also known as “Greener purchasing”, “Pre-cycling”, or “eco/green procurement”.
- Staff should be made aware of the aim to recycle waste by means of posters, training and staff meetings.
- Guests should be made aware of the lodge’s recycling programmes by means of recycling instructions in rooms and in strategic locations.
• Implement a ‘sort-at-source’ approach to waste management, and separate recyclable waste from non-recyclable waste;
• Separate viable recyclable components from the general waste stream prior to disposal. Recyclables that are typically recovered from general waste include metals, plastics, glass, and paper / cardboard.
• Recycling bins should be placed in strategic and convenient locations throughout the resort, and in sizes suitable to their location. They should be lidded and appropriately labelled or colour coded.
• Waste storage receptacles must be covered or lidded to prevent scavenging by wild animals and vermin, and to prevent waste from being windblown into the adjacent sensitive areas.
• Undertake regular clean-ups and litter removal across the entire site;
• Skips / receptacles should be emptied on a weekly basis to prevent the formation of odour.
• All general waste that cannot be reused or recycled should be stored temporarily in a designated area and transported to the closest permitted landfill.
• Ensure that the waste is removed by a suitably qualified waste service provider and that the relevant documentation with proof of proper waste disposal is available.
• A manifest indicating the volume (monthly) of disposed general waste should be kept on file.

10.3.3 Hazardous waste

• The disposal of hazardous waste must comply with all relevant Regulations, Norms and Standards pertaining to waste classification in order to ensure disposal at the correct landfill class.
• Avoid the generation of hazardous waste wherever possible through procurement processes e.g. purchasing of less toxic / environmentally friendly products.
• Petroleum, chemical, harmful and hazardous waste must be stored in enclosed, bunded areas. The bunded areas shall be clearly marked. Such waste shall be disposed of off-site at a licensed hazardous waste disposal site.
• Hazardous waste may be temporarily stored on site in vessels equipped with secondary containment structures to prevent contamination of soil, groundwater and surface waters due to accidental spills or releases.
• Forecast and prevent potential situations in which accidents and spills can mitigate against unwarranted waste emissions.
• Hazardous waste must be separated at source from the general waste stream. Common potential hazardous wastes include chemicals, used oils, oil contaminated waste, used cooking oils, fats and greases from extraction fans/filters, paint waste, fluorescent bulb waste, battery waste and E-waste.
• Effective grease traps should be installed at all kitchen or cooking facilities and these should be regularly serviced and checked for functionality.
• Certain hazardous wastes, including used oil, batteries and light bulbs, can be recycled through reputable agents. Where possible, all hazardous wastes, including hydrocarbon wastes such as oils, should be recycled either by a recognized recycling company or returned to the supplier.
• All hazardous wastes that cannot be reused or recycled should be labelled correctly and stored in the designated waste storage area until collected for correct disposal.
• Load and unload any solid hazardous materials in a manner that reduces potential spills.
• Ensure that a spills containment kit is available on site and that personnel are trained in spills clean up procedures.
• No spills may be hosed down into a storm water drain or sewer, or into the surrounding natural environment.
• Immediately clean leaks and spills of hazardous substances and dispose of as hazardous waste. The EO and ECO should be notified immediately if a hazardous waste spill occurs, to ensure proper clean-up and disposal.
• Any contaminated soil / substrate must be removed and stored in a skip until it can be disposed of at a permitted disposal site.
• Report major spills to the regional DWA office.
• Hazardous waste disposal must be undertaken by an approved waste contractor, and waste must be disposed of at a permitted hazardous waste disposal facility on a regular basis (H:H or H:h – landfill
operator to be contacted for verification). Ensure that all transportation and disposal / recovery permits and licenses are held by the service provider.

- All hazardous waste transported from the lodge must be reconciled with safe disposal certificates to be issued by the waste management service provider. These should be kept on file for inspection by the environmental authorities if required.

10.3.4 Sewage and effluent

- Ensure that the facility sewage system is maintained in a sanitary and operational state.
- Ensure that the facility sewage system is not overloaded, and that it functions within its design capacity. Take action to reduce output or increase capacity if necessary.
- Ensure that measures are put in place to prevent all leaks and spills.
- Repairs to the sewage system must be done immediately.
- In the event of a failure or overflow situation at the waste water treatment plant, implement a back-up system which will ensure that no sewage is discharged into the environment.
- Regular removal of sludge from the septic tanks by a licenced contractor (if required).
- Ensure that all treated effluent meets or exceeds South African water quality regulations prior to discharge or reuse.
- Undertake monthly wastewater monitoring to ensure that the output quality of the water complies with the minimum standards as prescribed by DWA. Ensure that these records are kept up to date and are available upon request.
- Ensure that the waste water treatment plant is operated and maintained by suitably qualified personnel, in strict accordance with the operating procedures.

11. STORM WATER MANAGEMENT PLAN

The purpose of the Storm Water Management Plan is to provide general guidelines and principles for the management of storm water during both the construction and operational phase. This is done to ensure minimal erosion and ecological damage as a result of increased volumes of storm water and runoff from hard surfaces (roofs, roads, paving etc.).

As this section forms part of the EMPr, the overall responsibility of ensuring compliance with the Storm Water Management Plan ultimately lies with the applicant.

11.1 Planning Phase

Develop a Storm Water Management Plan (by suitably qualified professional) to ensure that runoff from storm water does not result in erosion at the collection areas and at the discharge points. In general, the following measures are recommended:

- All roads and parking areas must have stable surfaces and channels lined (where possible) with vegetation.
- Do not allow surface water or storm water to canalize or be concentrated.
- Storm water outflows should not be allowed to enter directly into watercourses without appropriate energy dissipation in place.
- Points of storm water discharge as well as any areas downstream where the risk of accelerated erosion could occur must be stabilised and energy dissipation measures specified. Ecological methods (attenuation ponds, gabions, perforated mattresses, vegetation, etc) are preferred.
- All activities that affect surface drainage should be designed so as to ensure that storm water runoff does not lead to excessive surface erosion problems on the proposed site.
- Storm water infiltration must be promoted through minimising hard paved areas and using porous paving surfaces wherever possible.
- Rainwater runoff from roofs and hard should be directed into natural areas rather than into storm water drains wherever possible.
- Waste traps must be planned and included in the storm water design to catch litter conveyed by surface runoff.
- The harvesting of storm water for appropriate uses (such as cistern water or for irrigation) may be incorporated into the design of the development as appropriate.
- Make use of culverts large enough to prevent upstream sedimentation or downstream scouring.
- Employ recognised best practices to secure tie-ins and prevent erosion during extreme events and wherever possible place permanent infrastructure beyond the riparian zone.

11.2 Construction Phase

Implement and maintain a storm water management system for the facility. In general, the following measures are recommended:

- The protective buffer around the watercourses must be respected as it acts as a trap for sediment and contaminants. Measures must be put in place around sensitive areas to protect these from sediment and contaminants.
- Make use of erosion control measures to minimise erosion at excavation / clearing sites or aggregate storage sites. Earth moving construction activities to take place in dry season as far as possible.
- Remove only vegetation essential for construction and do not allow any disturbance to the adjoining natural vegetation cover.
- Ensure that measures are in place to control the flow of excess water so that it does not impact on the surface vegetation.
- The accumulation of water on the surface should be prevented. The drainage of the surface should be done in such a way that storm water will be led away quickly and efficiently without any erosion taking place.
- Do not allow surface water or storm water to canale or be concentrated
- Storm water outflows should not be allowed to enter directly into watercourses
- Runoff from roads must be managed to avoid erosion and pollution problems.
- Place and maintain erosion control barriers as appropriate to prevent sedimentation.
- Prevent storm water or contaminated water directly entering any watercourse.
- Install waste traps to catch litter conveyed by surface runoff.
- All waste traps within the storm water system will be emptied / cleaned regularly to ensure their efficient functioning.
- Dissipate concentrated storm water flows through energy dissipaters or vegetated areas.
- Proactively protect steep access roads, cuttings against and other areas susceptible to erosion by installing all the necessary temporary and permanent drainage works as soon as possible and by taking such other measures as may be necessary to prevent storm water being concentrated in water sources and from scouring the slopes, banks or other areas.
- Repair all erosion damage as soon as possible. Do not allow erosion to develop on a large scale before effecting repairs.
- The stabilisation of disturbed areas, access roads and / or steep cuttings is very site specific and could include reno mattresses, mitre drains, drainage pipes, benches, gabions; scarifying (ripping) areas along the natural contours or packing branches and rocks.
- Monitor all rehabilitated areas for at least a year following the completion of rehabilitation works for failure of vegetation to establish and / or erosion. Immediately implement remedial measures as required.
11.3 Operational Phase

Maintain the storm water management system for the facility on an ongoing basis and ensure that this is always in good working order. The following is of relevance:

- All activities that affect surface drainage should be designed so as to ensure that storm water runoff does not lead to excessive surface erosion problems on the site.
- Porous paving surfaces should be used in place of hard paved surfaces in order to promote and encourage the infiltration of storm water.
- The protective buffer around the watercourses must be respected as it acts as a trap for sediment and contaminants. Measures must be put in place around sensitive areas to protect these from sediment and contaminants.
- Ensure that measures are in place to control the flow of excess water so that it does not impact on the surface vegetation.
- The accumulation of water on the surface should be prevented. The drainage of the surface should be done in such a way that storm water will be led away quickly and efficiently without any erosion taking place.
- Do not allow surface water or storm water to canalize or be concentrated.
- Runoff from roads must be managed to avoid erosion and pollution problems.
- Place and maintain erosion control barriers as appropriate to prevent sedimentation.
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- Dissipate concentrated storm water flows through energy dissipaters or vegetated areas.
- Repair all erosion damage as soon as possible. Do not allow erosion to develop on a large scale before effecting repairs.
- Monitor all rehabilitated areas for at least a year following the completion of rehabilitation works for failure of vegetation to establish and / or erosion. Immediately implement remedial measures as required.

12. FIRE PROTECTION MANAGEMENT PLAN

The National Veld and Forest Fire Act (Act No. 101 of 1998) deals with the prevention and combat of veld, forest and mountain fires throughout South Africa, and should be adhered to at all times. This Act provides guidelines regarding fire break preparation and maintenance, the equipment needed for fighting fires and availability of personnel during fire emergencies, the roles and responsibilities of persons and officials during fire emergencies, the offences and penalties, as well as the powers of registered fire protection officers and law enforcement.

In terms of the National Veld and Forest Fire Act 101 of 1998 and the rules of the Greater Kruger Fire Protection Association (GKFPA), there is a restriction on the making of fires, in that no fires may be made without a permit.

The exception is where a cooking fire (including a braai fire) or a ‘social fire’ is to be made – this type of fire is, however, to be made according to requirements specified by the GKFPA. The second exception is where a fire is deemed essential for the combatting of a runaway fire, i.e. a ‘back-burn’. This must however be reported to the Fire Protection Officer (FPO) and to neighbours, as is required by law.

It is important that the Contractor and the Operator of the facility ensure that all staff is aware of the restrictions and other protocols stipulated by the GKFPA at that time. For more information regarding these restrictions, please contact any Section Ranger or Fire Manager, or the Fire Protection Officer (Veld Fires) for the GKFPA, Nick Zambatis on 013 735 4188, 071 680 4367 or nick.zambatis@sanparks.org.
Both the National Environmental Management (NEMA): Protected Areas Act, 57/2003 and National Veld Forest Fire Act are very clear on the penalties (fines, imprisonment or both) and/or disciplinary action which may be imposed on persons who are found guilty of not complying with the law or the rules of the Business Plan of the GKFPA.

### 12.1 Construction Phase

The following is applicable during the construction phase:

- The Contractor must take all the necessary precautions to ensure that fires are not started as a result of activities on site.
- No open fires will be permitted anywhere on site.
- No incineration or burning of waste will be permitted anywhere on site.
- Provide personnel and staff with gas for cooking purposes in demarcated, safe areas within the construction camp.
- Establish and maintain a fire break around the perimeter of the construction site prior to the commencement of construction activities. The input of SANParks must be sought in terms of required width and timing. The actual execution of the firebreak must be co-ordinated with SANParks. The contractor may not act independently in this regard.
- The Contractor should contact all of the adjacent farm owners prior to the commencement of the construction phase and ensure that he/she has the contact numbers so that they can be contacted in the event of a fire.
- Contractor to ensure that construction related activities that pose a potential fire risk, such as welding, are properly managed and are confined to areas where the risk of fires has been reduced.
- Measures to reduce the risk of fires include clearing working areas and avoiding working in high wind conditions when the risk of fires is greater. In this regard special care should be taken during the high risk dry, winter months.
- The Contractor shall supply all site offices, kitchen areas, workshop areas, material stores and any other areas identified with suitable, tested and approved fire-fighting equipment.
- All equipment shall be maintained in good operating order.
- Contractor to provide fire-fighting training to selected construction staff.
- In the event of a fire being caused by construction workers and or construction activities, the appointed contractors must compensate SANParks and private lodge owners for any damage caused by the fire. The contractor should bear the costs associated with fighting the fire.
- Contractor to ensure that the necessary fire fighting equipment is on site in accordance with relevant legislative requirements. The following minimum fire fighting equipment must be provided for on site, and be available and in full working order at all times:
  - Tractor with water cart and pressure pump (depending on recommendation from Local Registered Fire Protection Association);
  - 4X4 vehicle with mobile water tank and pressure pump;
  - Vehicle radio’s;
  - Cell phones;
  - Drip torches;
  - Fire beaters;
  - Tool box with necessary tools and spares;
  - Steel box for food and drink;
  - First Aid with additional oxygen apparatus;
  - CP3 Chemical sprayers;
  - Spot light; and
  - Kestral 4000 or a pocket weather tracker.
- The control of fires within the KNP is the responsibility of SANParks. The contractor should not attempt to control natural fires without the consent and direction of SANParks.
12.2. Operational Phase

The Greater Kruger Fire Protection Association (GKFPA) stipulates the following requirements regarding a cooking or a social fire, although the local Section Ranger or Fire Manager may set specific conditions as he/she deems fit:

- The fire must be made at a designated picnic or braai place, or in the yard of residential property, or in another area approved by the Section Ranger or Fire Manager.
- In all cases, the ground within a minimum radius of 4 m from where the fire is to be made must be clear of all combustible material, to reduce the possibility of the veld igniting.
- In instances where there a ‘social’ fire is made e.g. in a lapa, the fire may only be made where the ground is cleared of all combustible material for a radius of at least 5 m from the fire place. During windy conditions, the fire must be kept small or be extinguished.
- The fire must at all times be under the control of an adult.

In the case of all veld burns (i.e. management burns), where these are to be undertaken after the effective date of this restriction, a burning permit must be requested from the GKFPA. Requests must be submitted to the Fire Protection Officer at least a month before the scheduled burn in the case of high-intensity burns, and at least two weeks in the case of low-intensity burns.

The responsibility for the protection of huts and other buildings and infrastructure inside camps, lodges etc. lies with the managers of these facilities who must:

- Ensure that fires do not jump into the veld and start a veld-fire.
- Inform guests about the dangers of making large fires, especially on windy conditions because fires can also ignite the thatching of huts etc., as has happened in the past.

In addition to the above, the following general fire management actions apply throughout the operational phase of the facility:

- No incineration or burning of waste is permitted on the site.
- Establish and maintain a fire break around the perimeter of the site. The input of SANParks must be sought in terms of required width and timing. The actual execution of the firebreak must be co-ordinated with SANParks. The operator may not act independently in this regard.
- Lines of communication should be maintained with all of the adjacent farm owners so that they can be contacted in the event of a fire.
- Fire-fighting training is to be provided to selected operational staff.
- Operator is to ensure that the necessary fire fighting equipment is on site in terms of relevant legislative requirements.
- Staff members or the persons who give the instruction to light a fire without complying with the above-mentioned regulations will be subjected to disciplinary action and may also face criminal charges in terms of the Veld and Forest Fire Act 101 of 1998.
- The control of fires within the KNP is the responsibility of SANParks. The operator should not attempt to control natural fires without the consent and direction of SANParks.
REFERENCES


APPENDICES

Appendix A: Curriculum Vitae of the Environmental Assessment Practitioner
Appendix B.1: Layout of the Lodge
Appendix B.2: Layout of the Park-and-Ride
Appendix B.3: Layout of the Realigned S114
APPENDIX A: CURRICULUM VITAE OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER

CURRICULUM VITAE FOR
AMANDA VAN DER WESTHUIZEN

PERSONAL INFORMATION

Full Name: Amancia van der Westhuizen
Maiden surname: le Roux
Date of Birth: 1973-07-25
Gender: Female
Identity number: 7307250099064
Nationality: South African
Race: White
Language(s): English and Afrikaans (written and spoken)
Marital Status: Married (7 April 2001)
Dependants: None
Drivers License: Code EB

Residential Address: 221 Smith Street, Muckleneuk, Pretoria
Postal Address: P O Box 12232, Hatfield, Pretoria
Telephone number: 083 556 7307
Email address: mandy@nueafsa.co.za

FORMAL EDUCATION

Grade 12
- Willowridge High School, Pretoria, 1991
- Baccalaureus in Landscape Architecture
  - University of Pretoria, 1995

OTHER QUALIFICATIONS

- Accredited ILS (Inner Life Skills) Life Coach
- Academy of Metaphysics, Johannesburg 2006
- Prometric Certified Technical Trainer (CTT+)
- Tremend’s Train the Trainer, Pretoria, 2008
- SAQA Accredited Assessor
- Abasanguli Training Solutions, Pretoria, 2008
- Accredited Trainer for the Natural Step approach to Environmental Sustainability
  - The Natural Step South Africa, Johannesburg 2009

MEMBERSHIPS & AFFILIATIONS

TECHNICAL SKILLS

- MS Word operation (proficient)
- MS Excel operation (proficient)
- MS Outlook operation (proficient)
- Internet operation and navigation (capable)
- MS PowerPoint operation (proficient)
- AutoCAD 2D operation (proficient)
- CorelDRAW operation (capable)
- Adobe Photoshop operation (capable)

OTHER STRENGTHS

- Logical and analytical thinker, able to strategise and plan for an outcome;
- Creative and lateral thinker, able to think out of the box;
- Able to work individually, as part of a team and as a manager;
- Able to work under pressure and meet deadlines;
- Excellent communication and interpersonal skills;
- Organised, reliable, punctual and efficient;
- Ethical, honest and trustworthy;
- Committed to positive change and upliftment of individuals, society and the environment;

CAREER HISTORY

1. October 2012 – Present day:
   Company: NuLeaf Planning and Environmental
   Position: Partner / Director
   Reason for Leaving: Not Applicable (position current).

2. January 2009 – September 2012:
   Company: Various
   Position: Freelance Landscape Architect & Environmental Consultant
   Reason for Leaving: To start new company.

3. February 2008 – December 2008:
   Company: CTU Training Solutions, Pretoria
   Position: Head of Programme & Training Facilitator; AutoCAD Office Practice (National FET Certificate level N4)
   Reason for Leaving: End of fixed term contract.
   Company: Various
   Position:
   • Freelance Facilitator
   • Freelance Landscape Architect and Environmental Consultant
   Reason for Leaving:
   • To accept a position at CTU Training Solutions.

   Company: V&L Landscape Architects, Pretoria
   Position:
   • Landscape Architect
   Reason for Leaving:
   • To work as freelance.

5. June 1998 – present day:
   Company: University of Pretoria
   Position:
   • External Examiner / Guest Lecturer
   • Studio Assistant for Landscape Design (2nd and 3rd year)
   Scope of Work:
   • Ad hoc fixed term contracts (usually one semester)
   • Ad-hoc external examiner
   • Ad hoc guest lecturer
   Reason for Leaving:
   • Not Applicable (only ad hoc appointments).
## Relevant Work Experience

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<td>EIA for a proposed spa at Bakubung Lodge, Pineberg Game Reserve</td>
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<td>Concept design and Documentation for 14 Parks in Mahikeng</td>
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<td>Northern Cape DTEC</td>
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<td>2005</td>
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<td>EIA for the Upgrading of Various Tourism Infrastructure at the Vaalapo Dam</td>
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<td>Department of Water Affairs and Forestry</td>
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<td>Niewejaarskraal Diamond Mine</td>
<td>Transhex Operations (Pty) Ltd</td>
<td>Environmental Management System</td>
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APPENDIX B.1: LAYOUT OF THE LODGE

[Diagram of Malelane Safari Lodge layout]

Legend:
- Other roads
- Treelines
- Site boundary
- Limit of development/footprint
- 1% peak floodline

Layout: Lodge (Preferred Alternative)

Application for Environmental Authorisation: Proposed Malelane Safari Lodge
APPENDIX B.2: LAYOUT OF THE PARK-AND-RIDE

Application for Environmental Authorisation: Proposed Malelane Safari Lodge
APPENDIX B.3 LAYOUT OF THE REALIGNED S114