
KOTULO TSATSI ENERGY PV3 AND ASSOCIATED INFRASTRUCTURE, NORTHERN CAPE PROVINCE

ENVIRONMENTAL MANAGEMENT PROGRAMME

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Prepared for

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PROJECT DETAILS

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|-----------------------|---|---|
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DEFINITIONS AND TERMINOLOGY

The following definitions and terminology may be applicable to this project and may occur in the report below:

Alien species: A species that is not indigenous to the area or out of its natural distribution range.

Alternatives: Alternatives are different means of meeting the general purpose and need of a proposed activity. Alternatives may include location or site alternatives, activity alternatives, process or technology alternatives, temporal alternatives or the 'do nothing' alternative.

Ambient sound level: The reading on an integrating impulse sound level meter taken at a measuring point in the absence of any alleged disturbing noise at the end of a total period of at least 10 minutes after such meter was put into operation.

Assessment: The process of collecting, organising, analysing, interpreting and communicating information which is relevant.

Biological diversity: The variables among living organisms from all sources including, terrestrial, marine and other aquatic ecosystems and the ecological complexes they belong to.

Commence: The start of any physical activity, including site preparation and any other activity on site furtherance of a listed activity or specified activity, but does not include any activity required for the purposes of an investigation or feasibility study as long as such investigation or feasibility study does not constitute a listed activity or specified activity.

Construction: Construction means the building, erection or establishment of a facility, structure or infrastructure that is necessary for the undertaking of a listed or specified activity as per the EIA Regulations. Construction begins with any activity which requires Environmental Authorisation.

Cumulative impacts: The impact of an activity that in itself may not be significant, but may become significant when added to the existing and potential impacts eventuating from similar or diverse activities or undertakings in the area.

Decommissioning: To take out of active service permanently or dismantle partly or wholly, or closure of a facility to the extent that it cannot be readily re-commissioned. This usually occurs at the end of the life of a facility.

Direct impacts: Impacts that are caused directly by the activity and generally occur at the same time and at the place of the activity (e.g. noise generated by blasting operations on the site of the activity). These impacts are usually associated with the construction, operation, or maintenance of an activity and are generally obvious and quantifiable.

Disturbance noise: A noise level that exceeds the ambient sound level measured continuously at the same measuring point by 7 dB or more.

'Do nothing' alternative: The 'do nothing' alternative is the option of not undertaking the proposed activity or any of its alternatives. The 'do nothing' alternative also provides the baseline against which the impacts of other alternatives should be compared.

Ecosystem: A dynamic system of plant, animal and micro-organism communities and their non-living environment interacting as a functional unit.

Endangered species: Taxa in danger of extinction and whose survival is unlikely if the causal factors continue operating. Included here are taxa whose numbers of individuals have been reduced to a critical level or whose habitats have been so drastically reduced that they are deemed to be in immediate danger of extinction.

Endemic: An "endemic" is a species that grows in a particular area (is endemic to that region) and has a restricted distribution. It is only found in a particular place. Whether something is endemic or not depends on the geographical boundaries of the area in question and the area can be defined at different scales.

Environment: the surroundings within which humans exist and that is made up of:

- i. The land, water and atmosphere of the earth;
- ii. Micro-organisms, plant and animal life;
- iii. Any part or combination of (i) and (ii) and the interrelationships among and between them; and
- iv. The physical, chemical, aesthetic and cultural properties and conditions of the foregoing that influence human health and well-being.

Environmental Authorisation (EA): means the authorisation issued by a competent authority (Department of Forestry, Fisheries and the Environment) of a listed activity or specified activity in terms of the National Environmental Management Act (No 107 of 1998) and the EIA Regulations promulgated under the Act.

Environmental assessment practitioner (EAP): An individual responsible for the planning, management and coordinating of environmental management plan or any other appropriate environmental instruments introduced by legislation.

Environmental Control Officer (ECO): An individual appointed by the Owner prior to the commencement of any authorised activities, responsible for monitoring, reviewing and verifying compliance by the EPC Contractor with the environmental specifications of the EMPr and the conditions of the Environmental Authorisation

Environmental impact: An action or series of actions that have an effect on the environment.

Environmental impact assessment: Environmental Impact Assessment, as defined in the NEMA EIA Regulations, is a systematic process of identifying, assessing and reporting environmental impacts associated with an activity.

Environmental management: Ensuring that environmental concerns are included in all stages of development, so that development is sustainable and does not exceed the carrying capacity of the environment.

Environmental Management Programme (EMPr): A plan that organises and co-ordinates mitigation, rehabilitation and monitoring measures in order to guide the implementation of a project or facility and its ongoing maintenance after implementation.

Environmental Officer (EO): The Environmental Officer (EO), employed by the Contractor, is responsible for managing the day-to-day on-site implementation of this EMPr, and for the compilation of regular (usually weekly) Monitoring Reports. The EO must act as liaison and advisor on all environmental and related issues and ensure that any complaints received from the public are duly recorded and forwarded to the Site Manager and Contractor.

Habitat: The place in which a species or ecological community occurs naturally.

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

Indigenous: All biological organisms that occurred naturally within the study area prior to 1800.

Incident: An unplanned occurrence that has caused, or has the potential to cause, environmental damage.

Indirect impacts: Indirect or induced changes that may occur because of the activity (e.g. the reduction of water in a stream that supply water to a reservoir that supply water to the activity). These types of impacts include all the potential impacts that do not manifest immediately when the activity is undertaken or which occur at a different place because of the activity.

Interested and affected party (I&AP): Individuals or groups concerned with or affected by an activity and its consequences. These include the authorities, local communities, investors, work force, consumers, environmental interest groups, and the public.

Method Statement: a written submission by the Contractor in response to the environmental specification or a request by the Site Manager, setting out the plant, materials, labour and method the Contractor proposes using to conduct an activity, in such detail that the Site Manager is able to assess whether the Contractor's proposal is in accordance with the Specifications and/or will produce results in accordance with the Specifications.

Photovoltaic effect: Electricity can be generated using photovoltaic panels (semiconductors) which are comprised of individual photovoltaic cells that absorb solar energy to produce electricity. The absorbed solar radiation excites the electrons inside the cells and produces what is referred to as the Photovoltaic Effect.

Pre-construction: The period prior to the commencement of construction, which may include activities which do not require Environmental Authorisation (e.g. geotechnical surveys).

Pollution: A change in the environment caused by substances (radio-active or other waves, noise, odours, dust or heat emitted from any activity, including the storage or treatment or waste or substances).

Rare species: Taxa with small world populations that are not at present Endangered or Vulnerable, but are at risk as some unexpected threat could easily cause a critical decline. These taxa are usually localised within restricted geographical areas or habitats or are thinly scattered over a more extensive range. This category was termed Critically Rare by Hall and Veldhuis (1985) to distinguish it from the more generally used word "rare."

Red Data Species: Species listed in terms of the International Union for Conservation of Nature and Natural Resources (IUCN) Red List of Threatened Species, and/or in terms of the South African Red Data list. In terms of the South African Red Data list, species are classified as being extinct, endangered, vulnerable, rare, indeterminate, insufficiently known or not threatened (see other definitions within this glossary).

Significant impact: An impact that by its magnitude, duration, intensity, or probability of occurrence may have a notable effect on one or more aspects of the environment.

Vulnerable species: 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.

Waste: Any substance, material or object, that is unwanted, rejected, abandoned, discarded or disposed of, or that is intended or required to be discarded or disposed of, by the holder of that substance, material or object, whether or not such substance, material or object can be re-used, recycled or recovered and includes all wastes as defined in Schedule 3 to the Waste Amendment Act (as amended on June 2014); or any other substance, material or object that is not included in Schedule 3 that may be defined as a waste by the Minister by notice in the *Gazette*.

ABBREVIATIONS

The following abbreviations may be applicable to this project and may occur in the report below:

| | |
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| AIA | Archaeological Impact Assessment |
| BGIS | Biodiversity Geographic Information System |
| CDSM | Chief Directorate Surveys and Mapping |
| CEMP | Construction Environmental Management Plan |
| DFFE | Department of Forestry, Fisheries and the Environment |
| DENC | Northern Cape Department of Environment and Nature Conservation |
| DMRE | Department of Mineral Resources and Energy |
| DHSWS | Department of Human Settlements, Water and Sanitation |
| EAP | Environmental Assessment Practitioner |
| EHS | Environmental, Health and Safety |
| EIA | Environmental Impact Assessment |
| EIR | Environmental Impact Report |
| EMPr | Environmental Management Programme |
| GPS | Global Positioning System |
| GWh | Giga Watt hour |
| HIA | Heritage Impact Assessment |
| I&APs | Interested and Affected Parties |
| IDP | Integrated Development Plan |
| IFC | International Finance Corporation |
| IPP | Independent Power Producer |
| KOP | Key Observation Point |
| kV | Kilo Volt |
| LUDS | Land Use Decision Support |
| LUPO | Land Use Planning Ordinance |
| MW | Mega Watt |
| NEMA | National Environmental Management Act |
| NEMAA | National Environmental Management Amendment Act |
| NEMBA | National Environmental Management: Biodiversity Act |
| NERSA | National Energy Regulator of South Africa |
| NHRA | National Heritage Resources Act |
| NID | Notice of Intent to Develop |
| NSBA | National Spatial Biodiversity Assessment |
| NWA | National Water Act |
| PIA | Paleontological Impact Assessment |
| PM | Post Meridiem; "Afternoon" |
| SACAA | South African Civil Aviation Authority |
| SAHRA | South African National Heritage Resources Agency |
| SANBI | South Africa National Biodiversity Institute |
| SANS | South Africa National Standards |
| SDF | Spatial Development Framework |
| SMME | Small, Medium and Micro Enterprise |
| SAPD | South Africa Police Department |

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CHAPTER 1: INTRODUCTION

This Environmental Management Programme (EMPr) has been compiled for the Kotulo Tsatsi Energy PV3 facility and associated infrastructure proposed by Kotulo Tsatsi Energy (Pty) Ltd (the developer). The project is to be developed on Portion 2 of the Farm Styns Vley 280, located approximately 70km south-west of the town of Kenhardt in the Northern Cape Province. The project site falls in Ward 3 of the Hantam Local Municipality and within the greater Namakwa District Municipality. The project will be designed to have a contracted capacity of up to 480MW, and will make use of either fixed-tilt, single-axis tracking, or dual-axis (double-axis) tracking photovoltaic (PV) solar technology for the generation of electricity.

This EMPr has been developed on the basis of the findings of the Environmental Impact Assessment (EIA), and must be implemented to protect sensitive on-site and off-site features through controlling construction, operation and decommissioning activities that could have a detrimental effect on the environment, and through avoiding or minimising potential impacts. This EMPr is applicable to all employees and contractors working on the pre-construction, construction, and operation and maintenance phases of the project. In terms of the Duty of Care provision in S28(1) of NEMA, the project proponent must ensure that reasonable measures are taken throughout the life cycle of this project to ensure that any pollution or degradation of the environment associated with this project is avoided, halted or minimised. The document must therefore be adhered to and updated as relevant throughout the project life cycle. This document fulfils the requirement of the EIA Regulations, 2014 (as amended) and forms part of the EIA Report for the project.

CHAPTER 2: PROJECT DETAILS

The Applicant, Kotulo Tsatsi Energy (Pty) Ltd, is proposing the construction of a photovoltaic (PV) solar energy facility (known as the Kotulo Tsatsi Energy PV3) located on a site located approximately 70km south-west of the town of Kenhardt and 60km north east of Brandvlei in the Northern Cape Province. The solar energy facility will comprise several arrays of PV panels and associated infrastructure and will have a contracted capacity of up to 480MW. The facility will be located within the farm Portion 2 of Farm Styns Vley 280. The project site¹ falls under the Hantam Local Municipality which is part of Namakwa District Municipality. The solar PV facility will be connected to the grid via a previously authorised grid connection solution, which consists of a collector substation, switching station and a 132 kV power line to the Eskom Aries Substation located north-east of the project site. The site is accessible via an existing gravel farm road (known as Soafskolk Road) which provides access to the farm off of the R27 which is located east of the project site.

2.1 Project Site

The PV infrastructure assessed in this application is in response to the Applicant's need to change the authorised generation technology for the facility located on the farm Portion 2 of Farm Styns Vley 280. That is, a technology change from the previously authorised CSP project infrastructure to PV project infrastructure. In this regard, the solar PV facility will be connected to the grid via a 132kV grid connection solution to the authorised 400kV collector substation located on Portion 2 of Farm Styns Vley 280, and will comprise on-site switching substations, facility substations and a 132kV power line within a 300m wide corridor.

A development area² of ~ 1888ha was defined through the Scoping evaluation of the site and has now been assessed for the facility footprint. The development footprint³ has an extent of ~1350ha.

Infrastructure associated with the solar PV facility contracted capacity of up to 480MW will include:

- » Solar PV array comprising PV modules and mounting structures.
- » Inverters and transformers.
- » Cabling between the project components.
- » Access roads, internal distribution roads and fencing around the development area.
- » Substation and BESS hubs, including:
 - Battery Energy Storage System (BESS)
 - On-site facility substations, switching substations
- » 132kV power line within a 300m wide corridor to facilitate the connection between the PV Facility and the authorised 400kV collector substation.
- » O&M and laydown area hub, including:

¹ The project site is defined as Portion 2 of Farm Styns Vley 280, which has the extent of ~ 4954ha.

² The development area is that identified area (located within the project site) where the Kotulo Tsatsi Energy PV3 facility is planned to be located. This area has been selected as a practicable option for the facility, considering technical preference and constraints. The development area is ~1888ha in extent.

³ The development footprint is the defined area (located within the development area) where the PV panel array and other associated infrastructure for Kotulo Tsatsi Energy PV3 is planned to be constructed. This is the actual footprint of the facility, and the area which would be disturbed.

- Site offices and maintenance buildings, including workshop areas for maintenance and storage.
- Laydown areas and temporary construction camp area.

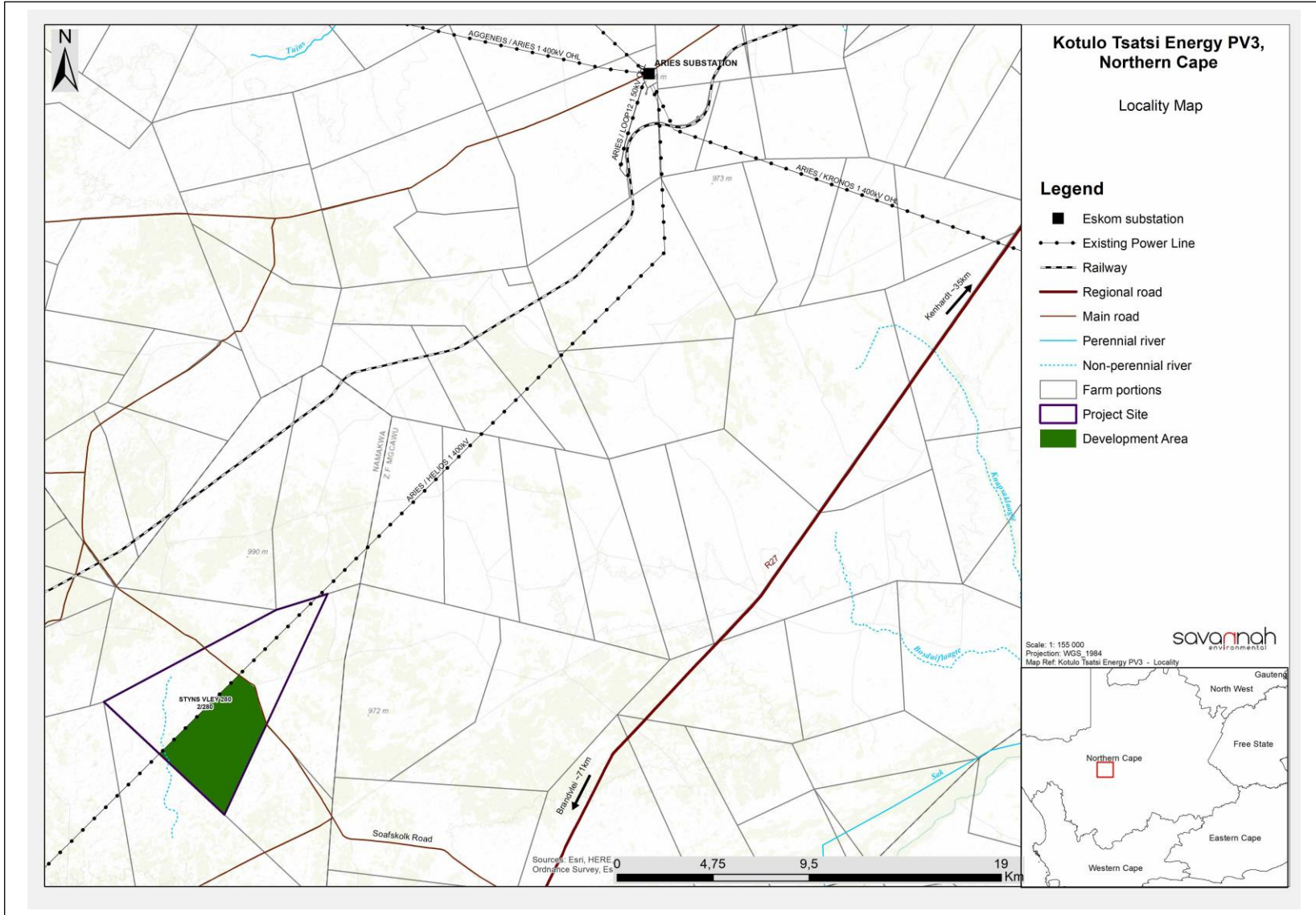


Figure 2.1: Locality map illustrating the location of the project site for the establishment of Kotulo Tsatsi Energy PV3.

2.3. Life-cycle Phases of Kotulo Tsatsi Energy PV3

A series of activities are proposed as part of the design, pre-construction, construction, operation, and decommissioning phases associated with the development of Kotulo Tsatsi Energy PV3. These are discussed in more detail under the respective sub-headings below.

Design and Pre-Construction Phase

Planning: Several post-authorisation factors are expected to influence the final design of the solar energy facility and could result in small-scale modifications of the PV array and/or associated infrastructure. An objective of the Engineering, Procurement and Construction (EPC) Contractor, who will be responsible for the overall construction of the project, will be to comply with the approved facility design as far as possible. It should be understood however, that the construction process is dynamic and that unforeseen changes to the project specifications may take place. This EIA Report therefore describes the project in terms of the best available knowledge at the time. The final facility design is required to be approved by the DFFE. Importantly, should there be any substantive changes or deviations from the original scope or layout of the project, the DFFE will need to be notified and where relevant, environmental approval obtained.

Conduct Surveys: Prior to initiating construction, a number of surveys will be required including, but not limited to, confirmation of the micro-siting footprint (i.e., the precise location of the PV panels, on-site facility substation and the associated infrastructure) and a geotechnical survey. Geotechnical surveys acquire information regarding the physical characteristics of soil and rocks underlying a proposed project site and inform the design of earthworks and foundations for structures.

Construction Phase

The construction phase will take approximately 12 to 18 months to complete, and will entail a series of activities including:

Procurement and employment

At the peak of construction, the project is likely to create a maximum of 500 employment opportunities. These employment opportunities will be temporary and will last for a period of approximately 12 to 18 months (i.e., the length of construction). Employment opportunities generated during the construction phase will include low skilled, semi-skilled, and skilled opportunities. Solar PV projects make use of high levels of unskilled and semi-skilled labour so there will be good opportunity to use local labour, where available. Employment opportunities will peak during the construction phase and significantly decline during the operation phase. The injection of income into the area in the form of wages will represent an opportunity for the local economy and businesses in the area.

The majority of the labour force is expected to be sourced from the surrounding towns, with the proposed man camp housing the employees during the construction phase.

Establishment of an Access Road

Access to the development area will be established for the construction and operation of Kotulo Tsatsi Energy PV3. Access to the project site is possible through the use of the existing Soafskolk Road (gravel) which is linked to the R27 located to the east of the development area. Within the development footprint itself, access will be required from new/existing roads for construction purposes (and limited access for

maintenance during operation). The final layout will be determined following the identification of site related sensitivities.

Undertake Site Preparation

Site preparation activities will include clearance of vegetation. These activities will require the stripping of topsoil which will need to be stockpiled, backfilled and/or spread on site.

Transport of Components and Equipment to Site

The national, regional, secondary and proposed internal access roads will be used to transport all components and equipment required during the construction phase. Some of the components (i.e., substation transformer) may be defined as abnormal loads in terms of the National Road Traffic Act (No. 93 of 1996) (NRTA)⁴ by virtue of the dimensional limitations. Typical civil engineering construction equipment will need to be brought to the project site (e.g. excavators, trucks, graders, compaction equipment, cement trucks, etc.) as well as components required for the mounting of the PV support structures, construction of the on-site facility substation and site preparation.

Establishment of Laydown Areas on Site

Laydown and storage areas will be required for typical construction equipment. Once the required equipment has been transported to site, a dedicated equipment construction camp and laydown area will need to be established adjacent to the workshop area. The equipment construction camp serves to confine activities and storage of equipment to one designated area, to limit the potential ecological impacts associated with this phase of the development. The laydown area will be used for the assembly of the PV panels, and the general placement/storage of construction equipment. It is anticipated that the temporary laydown area will be included within development footprint of the solar energy facility.

Erect PV Panels and Construct Substation and Invertors

The construction phase involves installation of the PV solar panels, structural and electrical infrastructure required for the operation of Kotulo Tsatsi Energy PV3. In addition, preparation of the soil and improvement of the access roads are likely to continue for most of the construction phase. For array installations, vertical support posts will be driven into the ground. Depending on the results of the geotechnical report, a different foundation method, such as screw pile, helical pile, micropile or drilled post/piles could be used. The posts will hold the support structures (tables) on which the PV modules would be mounted. Brackets will attach the PV modules to the tables. Trenches are to be dug for the underground AC and DC cabling, and the foundations of the inverter enclosures and transformers will be prepared. While cables are being laid and combiner boxes are being installed, the PV tables will be erected. Wire harnesses will connect the PV modules to the electrical collection systems. Underground cables and overhead circuits will connect the Power Conversion Stations (PCS) to the on-site AC electrical infrastructure, and ultimately the on-site facility substation.

The construction of the on-site facility substation will require a survey of the footprint, site clearing and levelling and construction of access road(s) (where applicable), construction of a level terrace and foundations, assembly, erection, installation and connection of equipment, and rehabilitation of any disturbed areas, and protection of erosion sensitive areas.

⁴ A permit will be required in accordance with Section 81 of the National Road Traffic Act (No. 93 of 1996) (NRTA) which pertains to vehicles and loads which may be exempted from provisions of Act.

Establishment of Ancillary Infrastructure

The establishment of the ancillary infrastructure and support buildings will require the clearing of vegetation and levelling of the development footprint, and the excavation of foundations prior to construction. Laydown areas for building materials and equipment associated with these buildings will also be required.

Undertake Site Rehabilitation

Once construction is completed and all construction equipment has been removed, the development enveloped will be rehabilitated where practical and reasonable. In addition, on full commissioning of Kotulo Tsatsi Energy PV3, any access points which are not required during operation must be closed and rehabilitated accordingly.

Operation Phase

Kotulo Tsatsi Energy PV3 is expected to operate for a minimum of 25 years. The facility will operate continuously, 7 days a week, and will include battery storage. While the solar facility will be largely self-sufficient, monitoring and periodic maintenance activities will be required. Key elements of the Operation and Maintenance (O&M) plan include monitoring and reporting the performance of the solar energy facility, conducting preventative and corrective maintenance, receiving visitors, and maintaining security.

The operation phase will create approximately 65 full-time equivalent employment positions which will include low-skilled, semi-skilled and skilled personnel. Employees that can be sourced from the local municipal area include the less skilled and semi-skilled personnel (such as safety and security staff and certain maintenance crew). Highly skilled personnel may need to be recruited from outside the local area where these resources are not available within the area.

Decommissioning Phase

Depending on the continued economic viability of Kotulo Tsatsi Energy PV3 following the initial 25-year operation lifespan, the solar energy facility will either be decommissioned, or the operation phase will be extended. If it is deemed financially viable to extend the operation phase, existing components would either continue to operate or be disassembled and replaced with new, more efficient technology / infrastructure available at the time. If the decision is made to decommission the facility, the following decommissioning activities will take place:

Site Preparation

Site preparation activities will include confirming the integrity of the access to the site to accommodate the required decommissioning equipment.

Disassembly and removal of existing components

When the solar energy facility is ultimately decommissioned, the equipment to be removed will depend on the land use proposed for the project site at the time. All above ground facilities that are not intended for future use will be removed. Much of the above ground wire, steel, and PV panels of which the system is comprised are recyclable materials and would be recycled to the extent feasible. The components of the solar energy facility would be de-constructed and recycled or disposed of in accordance with applicable regulatory requirements. The site will be rehabilitated where required and can potentially be returned to a beneficial land-use.

Future plans for the site and infrastructure after decommissioning

The generation capacity of the facility would have degraded by approximately 15% over the 25-year operational lifespan. The solar energy facility will potentially have the opportunity to generate power for a Merchant Market operation (i.e., the client would sell power on a bid basis to the market). Another option for the site after decommissioning is for the current land used to resume.

2.4 Findings of the Environmental Impact Assessment (EIA)

No environmental fatal flaws were identified in the detailed specialist studies conducted, provided that the recommended mitigation measures are implemented. These measures include, amongst others, the avoidance of highly sensitive features within the project site by the development footprint and the undertaking of monitoring, as specified by the specialists.

The potential environmental impacts associated with PV3 identified and assessed through the EIA process include:

- » Impacts on ecology, including flora and fauna.
- » Impacts on freshwater resources.
- » Impacts on avifauna.
- » Impacts to soils and agricultural potential.
- » Impacts on heritage resources, including archaeology and palaeontology.
- » Visual impacts on the area imposed by the components of the facility.
- » Social impacts.

The findings of the environmental assessment are summarised below:

2.4.1 Impacts on Ecology

The Terrestrial Ecology Assessment (**Appendix D**) determined that there are no impacts associated with the Kotulo Tsatsi Energy PV3 project that cannot be mitigated to an acceptable level, and as such the assessed layout was considered acceptable. The surrounding habitat is very homogenous therefore, the habitat loss resulting from the development would not result in significant local habitat loss for flora or fauna, or disrupt any broader scale movement corridors for fauna. Also, the development footprint is positioned outside of any CBAs, ESAs and Northern Cape-PAES focus areas, with the result that impacts on CBAs and the ability to meet future conservation targets would be minimal.

With the application of mitigation and avoidance measures, the impact of the Kotulo Tsatsi Energy PV3 on the local environment can be reduced to an acceptable magnitude. Overall, there are no specific long-term impacts likely to be associated with the development of the PV3 project that cannot be reduced to a low significance. As such, there are no fatal flaws associated with the development and no terrestrial ecological considerations that should prevent it from proceeding.

2.4.2 Impacts on Avifauna

The Avifaunal Assessment (**Appendix E**) determined that the Kotulo Tsatsi Energy PV3 site held very low species richness and abundance of priority collision-prone birds or Red Data species. This suggests the suitability for PV development. Furthermore, the development area of Kotulo Tsatsi Energy PV3 lies outside

the 3km Martial Eagle nest site buffer, and will reduce the impacts of habitat loss for future breeding Martial Eagles. The anticipated avifauna impacts listed with mitigation is low significance. Therefore, if recommendations and mitigations are followed, there is no objection to the development of the Kotulo Tsatsi Energy PV3.

2.4.3 Impacts on Freshwater Resources

The Freshwater Resources Assessment (**Appendix F**) concluded that there several watercourses consisting of depression wetlands, and minor and major streams located within the project area. The depression wetland and major ephemeral washes along with their associated 30m buffer areas, are regarded as No-Go areas for development of the Kotulo Tsatsi Energy PV3 facility. The minor ephemeral washes and drainage lines located within the current development footprint is not regarded as no-go areas for the placement of infrastructure.

With the implementation of the mitigation measures, all impacts would be reduced to a moderate or low significance which is considered to be acceptable. There are no fatal flaws associated with the development footprint. Although there is limited footprint within the high sensitivity areas, this is associated with existing road alignments. Given the avoidance of sensitive features at the site by the facility layout no high impacts are likely to occur as a result of the development.

Based on the outcomes of this study it is the specialists considered opinion that the proposed Kotulo Tsatsi Energy PV3 project can be authorised from a freshwater resource perspective.

2.4.4 Soils and Agricultural Potential

The determined land capabilities and climate capabilities of soils identified in the area are associated with Very Restricted and Very Low land potential levels. No "High" land capability sensitivities were identified within the project area, including the development envelope (refer to **Appendix G**). Considering the low sensitivity of the area to be affected by the project, the proposed activities will have an acceptable impact on agricultural productivity. It is therefore the specialist's opinion that the proposed activities may proceed as planned without the concern of loss of high sensitivity land capabilities or agricultural productivity.

2.4.5 Impacts on Heritage Resources

No significant archaeological or other heritage resources of cultural significance located within the proposed Kotulo Tsatsi Energy PV3 development footprint (**Appendix H**). The impact significance was determined to be of low significance with mitigation, where required.

Although the proposed development lies in a geological area of high palaeontological sensitivity, the conditions on the ground are such that the actual palaeontological sensitivity is low. As such, it is unlikely that the proposed development will negatively impact on significant palaeontological heritage on condition that the Chance Fossil Finds Procedure (provided in **Appendix H**) is implemented during excavation activities.

The specialist study recommended that the proposed Kotulo Tsatsi Energy PV3 facility should be authorised from an archaeological and paleontological perspective with the implementation of the recommended mitigation measures.

2.4.4 Visual Impacts

The Visual Impact Assessment (**Appendix I**) undertaken determined that the visual environment surrounding Kotulo Tsatso Energy PV3, especially within a 1 - 3km radius, may be visually impacted during the anticipated operational lifespan of the facility.

The anticipated visual impacts listed with mitigation range from medium to low significance. Anticipated visual impacts on sensitive visual receptors (if and where present) in close proximity to the proposed facility are not considered to be fatal flaws for the proposed Kotulo Tsatsi Energy PV3 facility. It is therefore recommended, from a visual perspective that the development of the facility as proposed be supported, subject to the implementation of the recommended mitigation measures.

2.4.6 Social Impacts

The social impacts identified will be either of a low or medium significance, depending on the impact. No negative impacts with a high significance rating have been identified to be associated with the development of Kotulo Tsatsi Energy PV3. All negative social impacts are within acceptable limits (medium or low significance depending on the impact being considered with no impacts considered as unacceptable from a social perspective. From a social perspective it is concluded that the project is acceptable subject to the implementation of the recommended mitigation and enhancement measures and management actions identified for the project.

2.4.7 Cumulative Impacts

Based on the specialist cumulative assessment and findings (**Appendix D to Appendix I** and Chapter 9 of the EIA), the development and its contribution to the overall impact of all renewable energy facilities to be developed within a 30km radius, it can be concluded that the Kotulo Tsatsi Energy PV3 Facility cumulative impacts will be of a medium to low significance, with impacts of a high significance relating to positive socio-economic impacts. It was concluded that the development of the Kotulo Tsatsi Energy PV3 Facility will not result in unacceptable, high cumulative impacts and will not result in a whole-scale change of the environment.

2.5 Environmental Sensitivity

As part of the specialist investigations undertaken within the project development area, which includes the development footprint, specific environmental features and areas were identified which will be impacted by the placement of Kotulo Tsatsi Energy PV3. The current condition of the features identified (i.e. intact or disturbed) will inform the sensitivity of the environmental features and its capacity for disturbance and change associated with the proposed development.

The environmental features identified within and directly adjacent to the development footprint and development area are illustrated in Figure 2.3. The features identified specifically relate to ecological and avifauna habitats, freshwater resources and heritage resources. The following points provide a description of those features of very high and high sensitivity identified within the development envelope:

- » Critical Biodiversity Areas are regarded as no-go areas for development.

- » Very High sensitivity ephemeral drainage lines and habitat, and pan features habitat are regarded as no-go areas for development and must be avoided as far as possible. Where Very High sensitivity features need to be traversed, existing roads or disturbance footprints should be used as far as possible from a freshwater perspective.
- » Boesmansland Vloere Habitat is of high sensitivity and considered to be no-go areas for development and must be avoided as far as possible.
- » The 3km buffer around the inactive Martial Eagle nest is considered to be no-go areas for development and must be avoided as far as possible.
- » High ecologically sensitive washes dominated by *Rhigozum trichotomum*. These areas are not considered to be no-go areas some development in the washes areas is considered acceptable, however, some caution should be exercised regarding vegetation clearing in these areas.

2.6. Optimised Layout

In response to the identified need to adequately manage impacts within sensitive areas identified on the site development footprint, and in order to demonstrate the commitment of the project to adhere to recommended mitigation measures, the project developer has developed a best practice mitigation strategy with regards to the facility layout.

The optimised development footprint was designed by the project developer in order to respond to and avoid the sensitive environmental features located within the development area. This approach ensured the application of the mitigation hierarchy (i.e., avoid, minimise, mitigate and offset), which ultimately ensures that the development is appropriate from an environmental perspective and is suitable for development within the development area (located within the project site). With the implementation of the optimised layout, the development footprint is suitable and appropriate from an environmental perspective for Kotulo Tsatsi Energy PV3, as it ensures the avoidance, reduction and/or mitigation of all identified detrimental or adverse impacts on sensitive features as far as possible. The optimised layout is recommended as the preferred layout for implementation (**Figure 2.3** and **Figure 2.4**), and represents a positive outcome in terms of impact reduction and mitigation and the optimal layout for the facility. As such, the impact of this Optimised Final Layout is considered to be acceptable and preferred.

The EIA recommendations have been taken into account by the project developer, and the facility layout has been refined to avoid the following:

- » Freshwater features buffer associated with the central ephemeral drainage line
- » Critical Biodiversity Areas 1
- » The 3km buffer around the inactive Martial Eagle

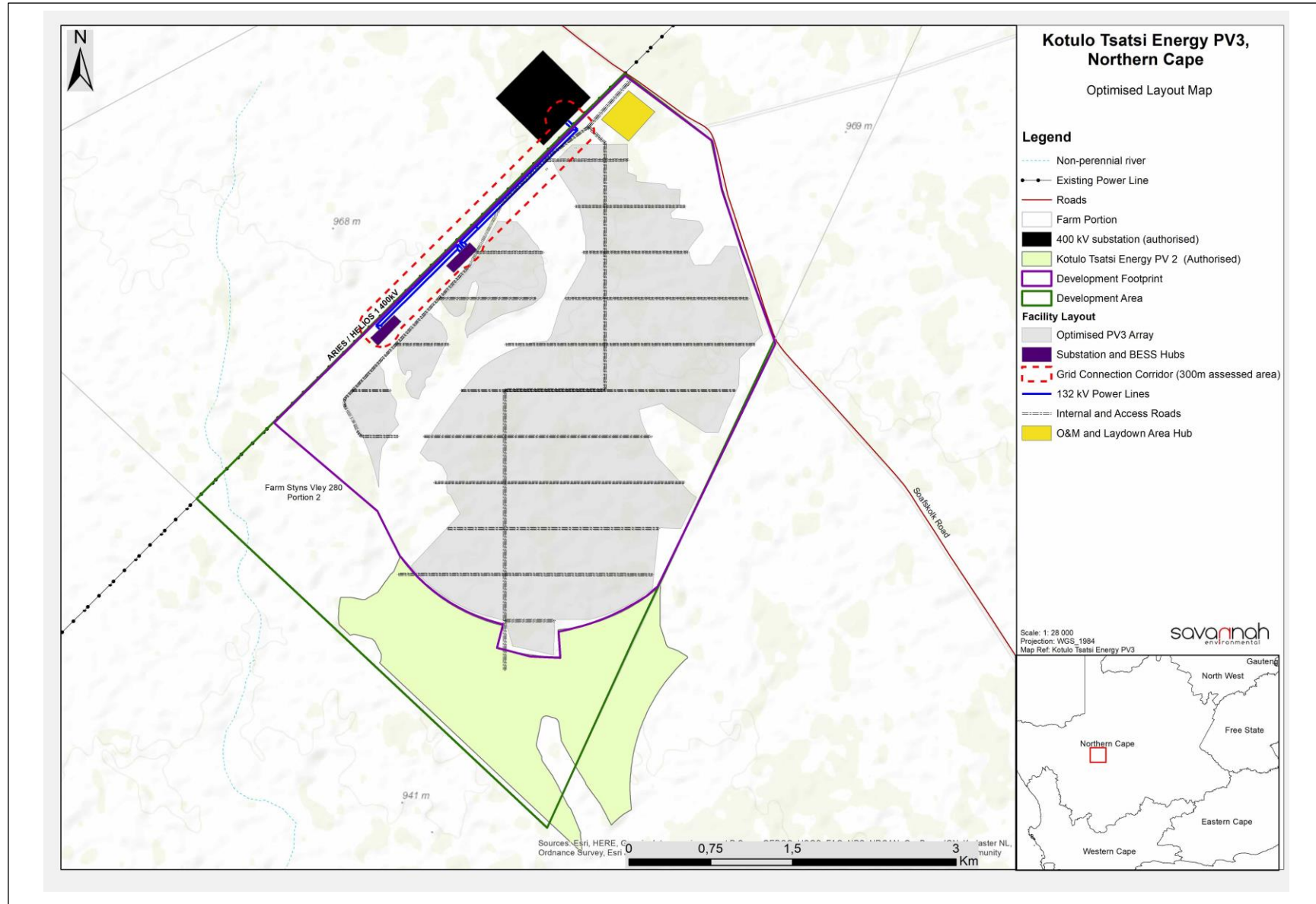


Figure 2.3: Optimised layout map of the development area considered for Kotulo Tsatsi Energy PV3.

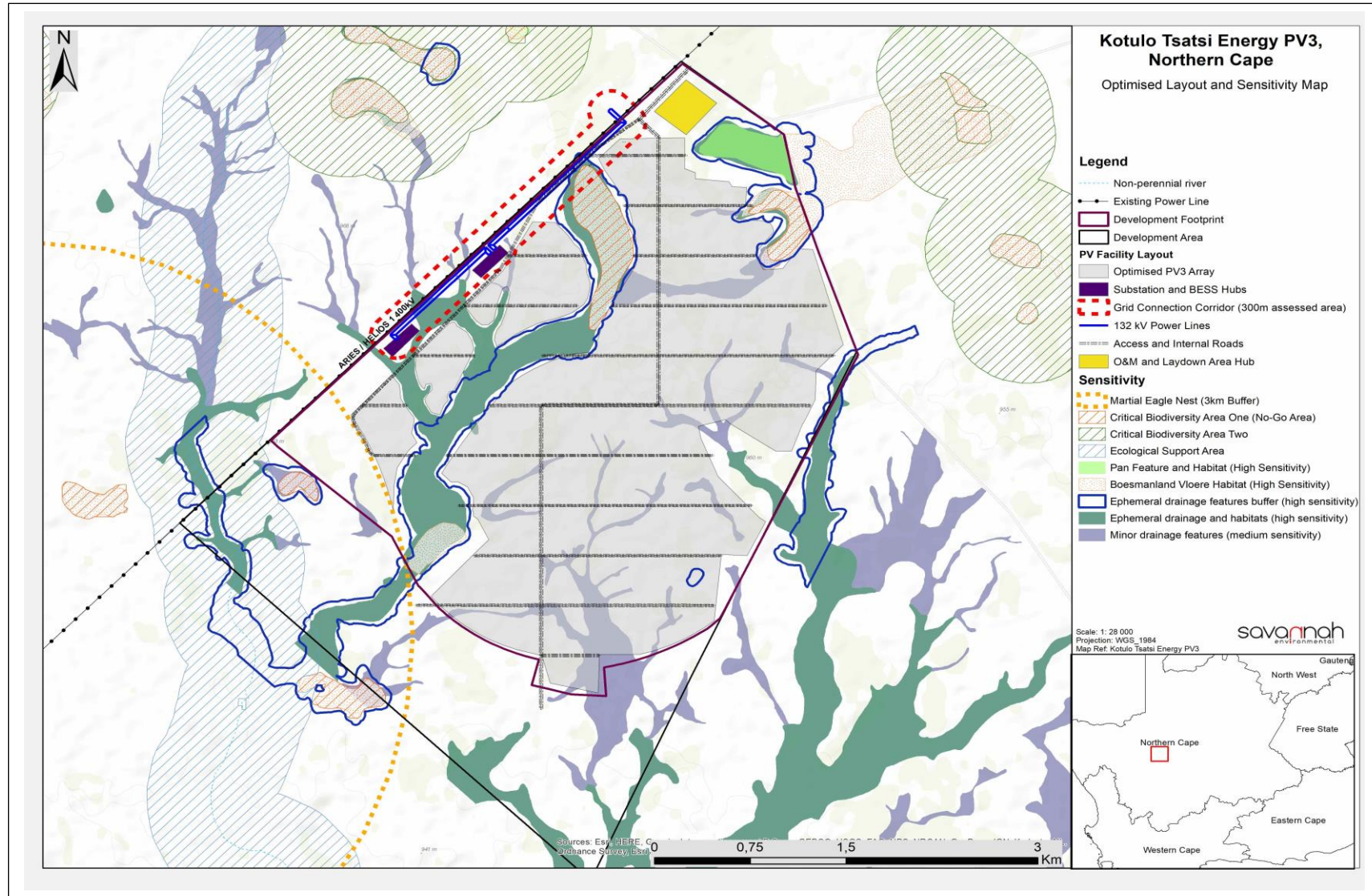


Figure 2.4: Optimised layout and sensitivity map for the development footprint for Kotulo Tsatsi Energy PV3

CHAPTER 3 : PURPOSE AND OBJECTIVES OF THE EMPr

An Environmental Management Programme (EMPr) is defined as “an environmental management tool used to ensure that undue or reasonably avoidable adverse impacts of the construction, operation and decommissioning of a project are prevented or mitigated, and that the positive benefits of the projects are enhanced”. The objective of this EMPr is to provide consistent information and guidance for implementing the management and monitoring measures established in the permitting process and help achieve environmental policy goals. The purpose of an EMPr is to help ensure continuous improvement of environmental performance, reducing negative impacts and enhancing positive effects during the construction and operation of the facility. An effective EMPr is concerned with both the immediate outcome as well as the long-term impacts of the project.

The EMPr provides specific environmental guidance for the construction and operation phases of a project, and is intended to manage and mitigate construction and operation activities so that unnecessary or preventable environmental impacts do not result. These impacts range from those incurred during start up (site clearing and site establishment) through to those incurred during the construction activities themselves (erosion, noise, dust) to those incurred during site rehabilitation (soil stabilisation, re-vegetation) and operation. The EMPr also defines monitoring requirements in order to ensure that the specified objectives are met.

This EMPr is applicable to all employees and contractors working on the pre-construction, construction, and operation and maintenance phases of Kotulo Tsatsi Energy PV3. The document must be adhered to and updated as relevant throughout the project life cycle.

This EMPr has been compiled in accordance with Appendix 4 of the EIA Regulations, 2014 (as amended) (refer to Table 4.1). This is a dynamic document and will be further developed in terms of specific requirements listed in any authorisations issued for Kotulo Tsatsi Energy PV 3 and/or as the project develops. This will ensure that the construction and operation activities are planned and implemented taking sensitive environmental features into account. The EMPr has been developed as a set of environmental specifications (i.e. principles of environmental management), which are appropriately contextualised to provide clear guidance in terms of the on-site implementation of these specifications (i.e. on-site contextualisation is provided through the inclusion of various monitoring and implementation tools).

The EMPr has the following objectives:

- » Outline mitigation measures and environmental specifications which are required to be implemented for the planning, construction, rehabilitation and operation phases of the project in order to minimise the extent of environmental impacts, and to manage environmental impacts associated with the Kotulo Tsatsi Energy PV3.
- » Ensure that the construction and operation phases do not result in undue or reasonably avoidable adverse environmental impacts, and ensure that any potential environmental benefits are enhanced.
- » Identify entities who will be responsible for the implementation of the measures and outline functions and responsibilities.
- » Propose mechanisms and frequency for monitoring compliance, and prevent long-term or permanent environmental degradation.

- » Facilitate appropriate and proactive responses to unforeseen events or changes in project implementation that were not considered in the EIA process.

The mitigation measures identified within the EIA process are systematically addressed in the EMPr, ensuring the minimisation of adverse environmental impacts to an acceptable level.

The Developer must ensure that the implementation of the project complies with the requirements of all environmental authorisations, permits, and obligations emanating from relevant environmental legislation. This obligation is partly met through the development and the implementation of this EMPr, and through its integration into the relevant contract documentation provided to parties responsible for construction and/or operation activities on the site. Since this EMPr is part of the EIA process for the Kotulo Tsatsi Energy PV3, it is important that this document be read in conjunction with the EIA Report compiled for this project. This will contextualise the EMPr and enable a thorough understanding of its role and purpose in the integrated environmental management process. Should there be a conflict of interpretation between this EMPr and the Environmental Authorisation, the stipulations in the Environmental Authorisation shall prevail over that of the EMPr, unless otherwise agreed by the authorities in writing. Similarly, any provisions in legislation overrule any provisions or interpretations within this EMPr.

This EMPr shall be binding on all the parties involved in the planning, construction and operational phases of the project, and shall be enforceable at all levels of contract and operational management within the project. The document must be adhered to and updated as relevant throughout the project life cycle.

CHAPTER 4: STRUCTURE OF THIS EMPr

The preceding chapters provide background to the EMPr and the proposed project, while the chapters which follow consider the following:

- » Planning and design activities;
- » Construction activities;
- » Operation activities; and
- » Decommissioning activities.

These chapters set out the procedures necessary for the project owner to minimise environmental impacts and achieve environmental compliance. For each of the phases of implementation for the project, an overarching environmental **goal** is stated. In order to meet this goal, a number of **objectives** are listed. The management programme has been structured in table format in order to show the links between the goals for each phase and their associated objectives, activities/risk sources, mitigation actions, monitoring requirements and performance indicators. A specific EMPr table has been established for each environmental objective. The information provided within the EMPr table for each objective is illustrated below:

OBJECTIVE: Description of the objective, which is necessary to meet the overall goals; which take into account the findings of the EIA specialist studies

| | |
|---|---|
| Project Component/s | List of project components affecting the objective, i.e.: » PV array and BESS » Access roads; and » Associated infrastructure. |
| Potential Impact | Brief description of potential environmental impact if objective is not met. |
| Activity/Risk Source | Description of activities which could affect achieving the objective. |
| Mitigation: Target/Objective | Description of the target and/or desired outcomes of mitigation. |

| Mitigation: Action/Control | Responsibility | Timeframe |
|---|-------------------------------------|---|
| List specific action(s) required to meet the mitigation target/objective described above. | Who is responsible for the measures | Time periods for implementation of measures |

| | |
|------------------------------|--|
| Performance Indicator | Description of key indicator(s) that track progress/indicate the effectiveness of the management programme. |
| Monitoring | Mechanisms for monitoring compliance; the key monitoring actions required to check whether the objectives are being achieved, taking into consideration responsibility, frequency, methods, and reporting. |

The objectives and EMPr tables are required to be reviewed and possibly modified whenever changes, such as the following, occur:

- » Planned activities change (i.e. in terms of the components and/or layout of the facility);
- » Modification to or addition to environmental objectives and targets;
- » Additional or unforeseen environmental impacts are identified and additional measures are required to be included in the EMPr to prevent deterioration or further deterioration of the environment.
- » Relevant legal or other requirements are changed or introduced; and
- » Significant progress has been made on achieving an objective or target such that it should be re-examined to determine if it is still relevant, should be modified, etc.

4.1 Contents of this Environmental Management Programme (EMPr)

This Environmental Management Programme (EMPr) has been prepared as part of the EIA process being conducted in support of the application for Environmental Authorisation (EA) for the Kotulo Tsatsi Energy PV3. This EMPr has been prepared in accordance with DFFE's requirements as contained in Appendix 4 of the 2014 EIA Regulations (GNR 326), and within the Acceptance of Scoping dated 23 January 2023. It provides recommended management and mitigation measures with which to minimise impacts and enhance benefits associated with the project.

An overview of the contents of this EMPr, as prescribed by Appendix 4 of the 2014 EIA Regulations (GNR 326), and where the corresponding information can be found within this EMPr is provided in Table 4.1.

Table 4.1: Summary of where the requirements of Appendix 4 of the 2014 NEMA EIA Regulations (GNR 326) are provided in this EMPr.

| Requirement | Location in this EMPr |
|--|---|
| (1) An EMPr must comply with section 24N of the Act and include – | |
| (a) Details of – | Chapter 4 Appendix L |
| (i) The EAP who prepared the EMPr. | |
| (ii) The expertise of that EAP to prepare an EMPr, including a curriculum vitae. | |
| (b) A detailed description of the aspects of the activity that are covered by the EMPr as identified by the project description. | Chapter 2 |
| (c) A map at an appropriate scale which superimposes the proposed activity, its associated structures, and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffers. | Chapter 2 Figure 2.2 to Figure 2.4 Appendix A |
| (d) A description of the impact management outcomes, including management statements, identifying the impacts and risks that need to be avoided, managed and mitigated as identified through the environmental impact assessment process for all phases of the development including – | |
| (i) Planning and design. | Chapter 5 |
| (ii) Pre-construction activities. | Chapter 5 |
| (iii) Construction activities. | Chapter 6 |
| (iv) Rehabilitation of the environment after construction and where applicable post closure. | Chapter 7 |
| (v) Where relevant, operation activities. | Chapter 8 |
| (f) A description of proposed impact management actions, identifying the manner in which the impact management outcomes contemplated in paragraph (d) will be achieved, and must, where applicable, include actions to – | |
| (i) Avoid, modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation. | Chapters 5 - 8 |

| Requirement | Location in this EMPr |
|---|-----------------------|
| (ii) Comply with any prescribed environmental management standards or practices. (iii) Comply with any applicable provisions of the Act regarding closure, where applicable. (iv) Comply with any provisions of the Act regarding financial provision for rehabilitation, where applicable. | |
| (g) The method of monitoring the implementation of the impact management actions contemplated in paragraph (f). | Chapters 5 - 8 |
| (h) The frequency of monitoring the implementation of the impact management actions contemplated in paragraph (f). | Chapters 5 - 8 |
| (i) An indication of the persons who will be responsible for the implementation of the impact management actions. | Chapters 5 - 8 |
| (j) The time periods within which the impact management actions contemplated in paragraph (f) must be implemented. | Chapters 5 - 8 |
| (k) The mechanism for monitoring compliance with the impact management actions contemplated in paragraph (f). | Chapters 5 - 8 |
| (l) A program for reporting on compliance, taking into account the requirements as prescribed by the Regulations. | Chapter 6 |
| (m) An environmental awareness plan describing the manner in which – (i) The applicant intends to inform his or her employees of any environmental risk which may result from their work. (ii) Risks must be dealt with in order to avoid pollution or the degradation of the environment. | Chapter 6 |
| (n) Any specific information that may be required by the competent authority. | Table 4.2 |
| (2) Where a government notice gazetted by the Minister provides for a generic EMPr, such generic EMPr as indicated in such notice will apply. | N/A |

4.2 Project Team

In accordance with Regulation 12 of the 2014 EIA Regulations (GNR 326) the applicant appointed Savannah Environmental (Pty) Ltd as the independent environmental consultants responsible for managing the application for EA and the supporting EIA process. The application for EA and the EIA process, is being managed in accordance with the requirements of NEMA, the 2014 EIA Regulations (GNR 326), and all other relevant applicable legislation.

4.2.1 Details and Expertise of the Environmental Assessment Practitioner (EAP)

Savannah Environmental is a leading provider of integrated environmental and social consulting, advisory and management services with considerable experience in the fields of environmental assessment and management. The company is wholly woman-owned (51% black woman-owned), and is rated as a Level 2 Broad-based Black Economic Empowerment (B-BBEE) Contributor. Savannah Environmental's team have been actively involved in undertaking environmental studies over the past 13 years, for a wide variety of projects throughout South Africa, including those associated with electricity generation and infrastructure development.

This EIA process is being managed by Karen Jodas. She is supported by Nkhensani Masondo, Debbie-Lee Janse van Rensburg and Nicolene Venter.

- » **Karen Jodas** holds a Master of Science Degree from Rhodes University. She is registered as a Professional Natural Scientist (400106/99) with the South African Council for Natural Scientific Professions (SACNASP) and with the Environmental Assessment Practitioners Association of South Africa (EAPASA (2022/5499)). She has gained extensive knowledge and experience on potential environmental impacts associated with electricity generation and transmission projects through her involvement in related EIA processes over the past 20 years. She has successfully managed and undertaken EIA processes for infrastructure development projects throughout South Africa.
- » **Nkhensani Masondo** is the EAP on this project is registered with the Environmental Assessment Practitioners Association of South Africa (EAPASA (2020/1385) and holds a BSocSci in Environmental Analysis and Management. She has seven (7) years of working experience in the environmental field and has gained extensive experience in conducting Environmental Impact Assessments, Stakeholder Engagements, Environmental Auditing and Environmental Management Plans Programmes for a wide range of projects.
- » **Debbie-Lee Janse van Rensburg** is the principle author of this report. She holds a Bachelor of Arts in Psychology, Geography and Environmental Management and a BSc. Honors degree in Environmental Science from the North West University. Her key focus is on undertaking environmental authorisation applications, environmental permitting, public participation, environmental impact assessments, and GIS mapping.
- » **Nicolene Venter** is a Social and Public Participation Consultant at Savannah Environmental. Nicolene has a Higher Secretarial Certificate from Pretoria Technicon, and a Certificate in Public Relations from the Public Relation Institute of South Africa at Damelin Management School. Nicolene has over 21 years of experience as a Public Participation Practitioner and Stakeholder Consultant, and is a Board Member of the International Association for Public Participation Southern Africa (IAP2SA). Nicolene's experience includes managing the stakeholder engagement components of large and complex environmental authorisation processes across many sectors, with particular experience in the power sector. Most notably on large linear power lines and distribution lines, as well as renewable energy projects. Nicolene is well versed with local regulatory requirements as well as international best practice principles for community consultation and stakeholder engagement, as well as international guidelines and performance standards. Nicolene is responsible for managing the Public Participation process required as part of the EIA for this project.

Savannah Environmental's team have been actively involved in undertaking environmental studies over the past 13 years, for a wide variety of projects throughout South Africa, including those associated with electricity generation and infrastructure development, and therefore have extensive knowledge and experience in EIAs and environmental management, having managed and drafted EMPrs for numerous other power generation projects throughout South Africa. Curricula Vitae (CVs) detailing the Savannah Environmental team's expertise and relevant experience are provided in **Appendix L** of the EMPr.

4.2.2 Details of the Specialist Consultants

A number of independent specialist consultants have been appointed as part of the EIA project team in order to adequately identify and assess potential impacts associated with the project (refer to **Table 4.1**). The specialist consultants have provided input into the EIA Report as well as this EMPr.

Table 4.1: Specialist Consultants which form part of the EIA project team.

| Specialist Study | Specialist Company | Specialist Name |
|---|--|----------------------------------|
| Ecology Impact Assessment | 3Foxes Biodiversity | Simon Todd |
| Avifauna Impact Assessment | Birds and Bats Unlimited | Rob Simmons |
| Freshwater Impact Assessment | Nkurenkuru Ecology and Biodiversity | Gerhard Botha |
| Soils and Agricultural Compliance Statement | The Biodiversity Company | Ivan Baker |
| Heritage Impact Assessment | CTS Heritage | Jenna Lavin |
| Visual Impact Assessment | EcoThunder | Brogan Geldenhuys |
| Social Impact Assessment | Savannah Environmental and Neville Bews & Associates | Molatela Ledwaba Neville Bews |

CHAPTER 5: PLANNING AND DESIGN MANAGEMENT PROGRAMME

Overall Goal: undertake the pre-construction activities (planning and design phase) in a way that:

- » Ensures that the preferred design and layout of the PV panels and associated infrastructure responds to the identified environmental constraints and opportunities.
- » Ensures that pre-construction activities are undertaken in accordance with all relevant legislative requirements.
- » Ensures that adequate regard has been taken of any landowner and community concerns and that these are appropriately addressed through design and planning (where appropriate).
- » Ensures that the best environmental options are selected for the linear components (underground cable network, short distribution power line), including the access roads.
- » Enables the construction activities to be undertaken without significant disruption to other land uses and activities in the area.

In order to meet this goal, the following objectives have been identified, together with necessary actions and monitoring requirements.

5.1 Objectives

OBJECTIVE 1: Ensure the facility design responds to identified environmental constraints and opportunities

The main sensitive features of the Kotulo Tsatsti PV 3 development envelope is major ephemeral washes. These features as well as its associated 30m buffer areas is regarded as no-go areas for development apart from road construction/upgrading and lying of cables, and only where the use of existing access roads is not an option. High ecologically sensitive areas have also been identified within the development envelope. These areas are dominated by *Rhigozum trichotomum*, and not considered to be no-go areas some development in these areas is considered acceptable from an acceptable from an ecological perspective, however, some caution should be exercised regarding vegetation clearing in these areas. Lastly, although the Kotulo Tsatsi Energy PV3 lies well outside of the 3km buffer around the inactive Martial Eagle nest, the 3km nest buffer is still recommended as a no-go area.

| | |
|--------------------------------|---|
| Project Component/s | <ul style="list-style-type: none"> » PV panels » Access roads » Inverter stations » Transformer » Underground cabling » Associated buildings. |
| Potential Impact | <ul style="list-style-type: none"> » Impact on identified sensitive areas. » Design fails to respond optimally to the environmental considerations. |
| Activities/Risk Sources | <ul style="list-style-type: none"> » Positioning of all project components » Pre-construction activities, e.g. geotechnical investigations, site surveys and environmental walk-through surveys. » Positioning of temporary sites. |

| | |
|---|---|
| Mitigation: Target/Objective | <ul style="list-style-type: none"> » The design of the PV facility, power line responds to the identified environmental constraints and opportunities. » Optimal planning of infrastructure to minimise visual impact. » Site sensitivities are taken into consideration and avoided as far as possible, thereby mitigating potential impacts. |
|---|---|

| Mitigation: Action/Control | Responsibility | Timeframe |
|--|--------------------------------------|---------------------------------------|
| Plan and conduct pre-construction activities in an environmentally acceptable manner. | Developer Contractor | Pre-construction |
| Undertake a detailed geotechnical pre-construction survey. | Developer Geotechnical specialist | Pre-construction |
| Finalise layout of all components, and submit to DFFE for approval prior to commencement of construction. | Developer | Prior to construction |
| The EMPr should form part of the contract with the Contractors appointed to construct the PV facility and associated infrastructure,, and must be used to ensure compliance with environmental specifications and management measures. The implementation of this EMPr for all life cycle phases of the project is considered to be key in achieving the appropriate environmental management standards as detailed for this project. | Developer Contractor | Tender Design and Design Review Stage |
| Plan the placement of laydown areas and assembly plant in order to minimise vegetation clearing (i.e. in already disturbed areas) wherever possible and to avoid habitat loss and disturbance to adjoining areas. | Developer | Pre-construction |
| The construction equipment camps must be planned as close to the site as possible to minimise impacts on the environment. | Developer | Pre-construction |
| Ensure that laydown areas and other temporary use areas are located in areas of low sensitivity and are properly fenced or demarcated as appropriate and practically possible. | Developer | Project planning |
| Plan development levels to minimise earthworks to ensure that levels are not elevated. | Developer | Project planning |
| The construction site must be fenced off. The fence around the facility should be designed to be animal and bird friendly, to prevent entrapment and electrocutions of ground-dwelling birds and animals. In practical terms this means that the perimeter fence of the facility should only include the developed areas and as little undeveloped ground or natural veld as possible. No electrified strands should be placed within 30cm of the ground as some species such as tortoises are susceptible to electrocution from electric fences because they do not move away when electrocuted but rather adopt defensive behaviour and are killed by repeated shocks. Alternatively, the electrified strands should be placed on the inside of the fence and not the outside as is the case on the majority of already constructed PV plants. | Developer | Project planning |
| Clear rules and regulations for access to the proposed site must be developed. | Developer Contractor | Pre-Construction |
| Access roads and entrances to the site should be carefully planned to limit any intrusion on the neighbouring property owners and road users. | Developer | Planning and design |

| Mitigation: Action/Control | Responsibility | Timeframe |
|--|-------------------------------------|---------------------|
| The highly sensitive major ephemeral washes and their associated buffer areas must be regarded as No-Go areas for all construction activities apart from road construction/upgrading and laying of cables, and only where the use of existing access roads is not an option. | Developer Contractor | Design |
| Plan and placement of light fixtures for the plant and the ancillary infrastructure in such a manner so as to minimise glare and impacts on the surrounding area. | Developer Contractor | Planning |
| New elements should be designed to blend as naturally as possible with their backdrop. | Developer Design engineer | Design and planning |
| Plan to maintain the height of structures as low as possible. | Developer Design engineer | Design and planning |
| Minimise disturbance of the surrounding landscape and maintain existing vegetation around the development | Developer Design engineer | Design and planning |
| Reduce the construction period as far as possible through careful planning and productive implementation of resources. | Developer Contractor | Pre-construction |
| Consider planning and design level mitigation measures recommended by the specialists as part of the EIA process. | Engineering Design Consultant | Design Phase |

| | |
|------------------------------|---|
| Performance Indicator | <ul style="list-style-type: none"> » The design meets the objectives and does not degrade the environment. » Demarcated sensitive areas are avoided at all times. » Design and layouts respond to the mitigation measures and recommendations in the EIA Report. |
| Monitoring | <ul style="list-style-type: none"> » Review of the design by the Project Manager and the Environmental Control Officer (ECO) prior to the commencement of construction. » Monitor ongoing compliance with the FMP and method statements. |

OBJECTIVE 2: Ensure that relevant permits and plans are in place to manage impacts on the environment

| | |
|-------------------------------------|---|
| Project Component/s | <ul style="list-style-type: none"> » PV Array and BESS » Access roads » Inverter stations » Transformer » Underground cabling » Associated buildings. |
| Potential Impact | <ul style="list-style-type: none"> » Impact on identified sensitive areas and protected species. » Design fails to respond optimally to the environmental considerations. |
| Activities/Risk Sources | <ul style="list-style-type: none"> » Positioning of all project components » Pre-construction activities, e.g. geotechnical investigations, site surveys and internal access roads and environmental walk-through surveys. » Positioning of temporary sites. |
| Mitigation: Target/Objective | <ul style="list-style-type: none"> » To ensure that the design of the power plant responds to the identified environmental constraints and opportunities. » To ensure that pre-construction activities are undertaken in an environmentally friendly manner. |

- » To ensure that the design of the power plant responds to the identified constraints identified through pre-construction surveys.

| Mitigation: Action/Control | Responsibility | Timeframe |
|---|------------------------------|----------------------------------|
| Obtain any additional environmental permits required prior to the commencement of construction. Copies of permits/licenses must be submitted to the Director: Environmental Impact Evaluation at the DFFE | Developer | Pre-construction |
| Obtain abnormal load permits for transportation of project components to site (if required). | Contractor(s) | Prior to construction |
| Pre-construction walk-through of the facility's final layout must be undertaken in order to locate species of conservation concern that can be translocated as well as comply with the Northern Cape Nature Conservation Act and DAEARD&LR permit conditions. | Developer Specialist | Pre-construction |
| A chance find procedure must be developed and implemented in the event that archaeological or palaeontological resources are found. | Developer Contractor | Pre-construction |
| Prepare a detailed Fire Management Plan (FMP) in collaboration with surrounding landowners. | Developer | Pre-construction |
| Communicate the FMP to surrounding landowners and maintain records thereof. | Developer | Pre-construction Construction |
| A Stormwater Management Plan (SWMP) should be developed and should provide for a drainage system sufficiently designed to prevent water run-off from the solar panels to cause soil erosion. | Developer Design engineer | Pre-construction |
| Develop and implement an alien, invasives and weeds eradication/control plan | Developer Specialist | Pre-construction |

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|------------------------------|---|
| Performance Indicator | <ul style="list-style-type: none"> » Permits are obtained and relevant conditions complied with. » Impact on protected plant species reduced to some degree through Search and Rescue. » Relevant management plans and Method Statements prepared and implemented. |
| Monitoring | <ul style="list-style-type: none"> » Review of the design by the Project Manager and the Environmental Control Officer (ECO) prior to the commencement of construction. » Monitor ongoing compliance with the EMP and method statements. |

OBJECTIVE 4: Ensure appropriate planning is undertaken by contractors

| | |
|----------------------------|---|
| Project Component/s | <ul style="list-style-type: none"> » PV panels » Access roads » Inverter stations » Transformer » BESS » Underground cabling » Associated buildings. |
| Potential Impact | <ul style="list-style-type: none"> » Impact on identified sensitive areas. » Design and planning fail to respond optimally to the environmental considerations. |

| | |
|-------------------------------------|--|
| Activities/Risk Sources | <ul style="list-style-type: none"> » Positioning of all project components » Pre-construction activities. » Positioning of temporary sites. » Employment and procurement procedures. |
| Mitigation: Target/Objective | <ul style="list-style-type: none"> » To ensure that the design of the PV facility responds to the identified environmental constraints and opportunities. » To ensure that pre-construction activities are undertaken in an environmentally friendly manner. |

| Mitigation: Action/Control | Responsibility | Timeframe |
|---|-------------------------|------------------|
| The terms of this EMPr and the Environmental Authorisation must be included in all tender documentation and Contractors contracts. | Developer Contractor | Pre-construction |
| Develop a database of local companies, specifically Historically Disadvantaged (HD) which qualify as potential service providers (e.g. construction companies, security companies, catering companies, waste collection companies, transportation companies etc.) prior to the tender process and invite them to bid for project-related work where applicable. | Developer | Pre-construction |
| Pre-construction environmental induction for all construction staff on site must be provided to ensure that basic environmental principles are adhered to. This includes awareness of no littering, appropriate handling of pollution and chemical spills, avoiding fire hazards, minimising wildlife interactions, remaining within demarcated construction areas etc. | EO | Pre-construction |
| Consult with adjacent landowners where livestock crosses the Soafskolk road in order to come to an agreement regarding the use of the road and the management of the livestock due to the lack of fencing. | Developer Contractor | Pre-construction |
| A local procurement policy must be adopted to maximise the benefit to the local economy. | Developer Contractor | Pre-construction |
| Recruitment of temporary workers onsite is not to be permitted. A recruitment office with a Community Liaison Officer should be established to deal with jobseekers. | Developer Contractor | Pre-Construction |
| Set up a labour desk in a secure and suitable area to discourage the gathering of people at the construction site. | Developer Contractor | Pre-Construction |
| Local community organisations and policing forums must be informed of construction times and the duration of the construction phase. Procedures for the control and removal of loiterers at the construction site should be established. | Developer Contractor | Pre-Construction |
| Security company must be appointed and appropriate security procedures implemented. | Developer Contractor | Pre-Construction |
| A comprehensive employee induction programme must be developed and utilised to cover land access protocols, fire management and road safety. | Contractor | Pre-construction |
| Changes in ground level may not infringe statutory ground to conductor clearances or statutory visibility clearances. After any changes in ground level, the surface shall be rehabilitated and stabilised so as to prevent erosion. The measures taken shall be to | Contractor | Pre-construction |

| Mitigation: Action/Control | Responsibility | Timeframe |
|---|-------------------------|------------------|
| Eskom's satisfaction. | | |
| No mechanical equipment, including mechanical excavators or high lifting machinery, shall be used in the vicinity of Eskom's apparatus and/or services, without prior written permission having been granted by Eskom. If such permission is granted the developer must give at least seven working days' notice prior to the commencement of work. This allows time for arrangements to be made for supervision and/or precautionary instructions to be issued by the relevant Eskom Manager. Note: Where an electrical outage is required, at least fourteen work days are required to arrange it. | Contractor | Pre-construction |
| The use of explosives of any type within 500 metres of Eskom's services shall only occur with Eskom's previous written permission. If such permission is granted the developer must give at least fourteen working days prior notice of the commencement of blasting. This allows time for arrangements to be made for supervision and/or precautionary instructions to be issued in terms of the blasting process. It is advisable to make application separately in this regard. | Contractor | Pre-construction |
| Perform a skills audit to determine the potential skills that could be sourced in the area | Developer Contractor | Pre-construction |

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| Performance Indicator | <ul style="list-style-type: none"> » Conditions of the EMPr form part of all contracts. » Local employment and procurement is encouraged. |
| Monitoring | <ul style="list-style-type: none"> » Monitor ongoing compliance with the EMP and method statements. |

OBJECTIVE 5: Ensure effective communication mechanisms

On-going communication with affected and surrounding landowners is important to maintain during the construction and operation phases of the development. Any issues and concerns raised should be addressed as far as possible in as short a timeframe as possible.

| | |
|-------------------------------------|--|
| Project component/s | <ul style="list-style-type: none"> » PV facility. » Access road. » Associated infrastructure. |
| Potential Impact | <ul style="list-style-type: none"> » Impacts on affected and surrounding landowners and land uses |
| Activity/risk source | <ul style="list-style-type: none"> » Activities associated with construction » Activities associated with operation |
| Mitigation: Target/Objective | <ul style="list-style-type: none"> » Effective communication with affected and surrounding landowners, and communities. » Addressing of any issues and concerns raised as far as possible in as short a timeframe as possible. |

| Mitigation: Action/control | Responsibility | Timeframe |
|---|----------------|------------------|
| Compile and implement a grievance mechanism procedure for | Developer | Pre-construction |

| Mitigation: Action/control | Responsibility | Timeframe |
|--|---|--|
| the public to be implemented during both the construction and operation phases of the facility. This procedure should include details of the contact person who will be receiving issues raised by interested and affected parties, and the process that will be followed to address issues. | Contractor O&M Contractor | (construction procedure) Pre-operation (operation procedure) |
| Develop and implement a grievance mechanism for the construction, operation and closure phases of the project for all employees, contractors, subcontractors and site personnel. This procedure should be in line with the South African Labour Law. | Developer Contractor O&M Contractor | Pre-construction (construction procedure) Pre-operation (operation procedure) |
| Liaising with landowners must be undertaken prior to the commencement of construction in order to provide sufficient time for them to plan agricultural activities. | Developer Contractor | Pre-construction |
| Organise local community meetings to advise the local labour on the project that is planned to be established and the jobs that can potentially be applied for | Contractor | Pre-construction |
| Before construction commences, representatives from the local municipality, community leaders, community-based organisations and the surrounding property owners (of the larger area), must be informed of the details of the contractors, size of the workforce and construction schedules. | Developer Contractor | Pre-construction and construction |
| Clearly inform the local municipality of the potential impact of the proposed project in order for the necessary preparations to take place | Developer | Pre-construction |

| | |
|------------------------------|--|
| Performance Indicator | » Effective communication procedures in place. |
| Monitoring | <ul style="list-style-type: none"> » A Public Complaints register must be maintained, by the Contractor to record all complaints and queries relating to the project and the action taken to resolve the issue. » All correspondence should be in writing. » Developer and contractor must keep a record of local recruitments and information on local labour; to be shared with the ECO for reporting purposes during construction. |

OBJECTIVE 6: Ensure protection of the Karoo Central Astronomy Advantage Areas and minimise interference to SKA radio telescope infrastructure

| | |
|-------------------------------------|---|
| Project Component/s | <ul style="list-style-type: none"> » PV facility. » Associated infrastructure. |
| Potential Impact | » Impact SKA radio telescope infrastructure due to radiated electromagnetic emissions |
| Activities/Risk Sources | » All moving PV infrastructure or infrastructure radiating electromagnetic emissions |
| Mitigation: Target/Objective | » To ensure that the design of the PV facility responds to any identified radio frequency interference. |

| Mitigation: Action/Control | Responsibility | Timeframe |
|----------------------------|----------------|-----------|
|----------------------------|----------------|-----------|

| Mitigation: Action/Control | Responsibility | Timeframe |
|---|-------------------------|---------------------|
| Determine radiated electromagnetic emission levels from the facility for SRAO to undertake compliance assessment. | Developer Specialist | Planning and design |
| Develop EMC Control Plan with identified mitigation measures | Developer Specialist | Planning and design |

| | |
|------------------------------|--|
| Performance Indicator | » The design meets the objectives and risk of interference to the SKA radio telescope is low |
| Monitoring | » Implementation of mitigations of EMC Control Plan in design of facility |

CHAPTER 6: MANAGEMENT PROGRAMME: CONSTRUCTION

Overall Goal: Undertake the construction phase in a way that:

- » Ensures that construction activities are appropriately managed in respect of environmental aspects and impacts.
- » Enables construction activities to be undertaken without significant disruption to other land uses and activities in the area, in particular concerning noise impacts, farming practices, traffic and road use, and effects on local residents.
- » Minimises the impact on the indigenous natural vegetation, and habitats of ecological value.
- » Minimises impacts on fauna (including birds) in the study area.
- » Minimises the impact on heritage sites should they be uncovered.
- » Establish an environmental baseline during construction activities on the site, where possible.

6.1 Institutional Arrangements: Roles and Responsibilities for the Construction Phase

As the proponent, Kotulo Tsatsi Energy (Pty) Ltd must ensure that the project complies with the requirements of all environmental authorisations and permits, and obligations emanating from other relevant environmental legislation. This obligation is partly met through the development of the EMPr, and the implementation of the EMPr through its integration into the contract documentation. The Developer will retain various key roles and responsibilities during the construction phase.

OBJECTIVE 1: Establish clear reporting, communication, and responsibilities in relation to the overall implementation of the EMPr

Formal responsibilities are necessary to ensure that key procedures are executed. Specific responsibilities of the Technical Director/Manager, Site Manager, Internal Environmental Officer, Safety and Health Representative, Independent Environmental Control Officer (ECO) and Contractor for the construction phase of this project are as detailed below. Formal responsibilities are necessary to ensure that key procedures are executed. **Figure 6.1** provides an organogram indicating the organisational structure for the implementation of the EMPr.

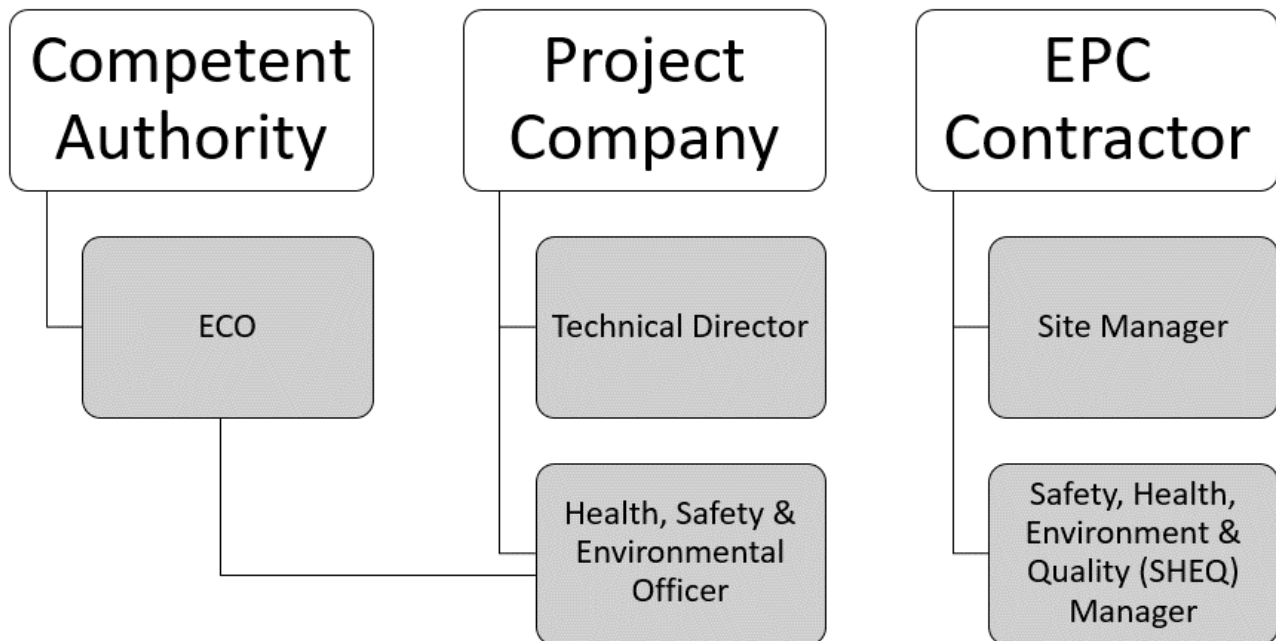


Figure 6.4: Organisational structure for the implementation of the EMPr

Construction Manager will:

- » Ensure all specifications and legal constraints specifically with regards to the environment are highlighted to the Contractor(s) so that they are aware of these.
- » Ensure that the Developer and its Contractor(s) are made aware of all stipulations within the EMPr.
- » Ensure that the EMPr is correctly implemented throughout the project by means of site inspections and meetings. This will be documented as part of the site meeting minutes through input from the independent ECO.
- » Be fully conversant with the EIA for the project, the EMPr, the conditions of the Environmental Authorisation, and all relevant environmental legislation.
- » Be fully knowledgeable with the contents of all relevant licences and permits.

Site Manager (The Contractor's on-site Representative) will:

- » Be fully knowledgeable with the contents of the EIA.
- » Be fully knowledgeable with the contents and conditions of the Environmental Authorisation.
- » Be fully knowledgeable with the contents of the EMPr.
- » Be fully knowledgeable with the contents of all relevant environmental legislation, and ensure compliance with these.
- » Have overall responsibility of the EMPr and its implementation.
- » Conduct audits to ensure compliance to the EMPr.
- » Ensure there is communication with the Technical Director, the ECO, the Internal Environmental Officer and relevant discipline engineers on matters concerning the environment.
- » Be fully knowledgeable with the contents of all relevant licences and permits.

- » Ensure that no actions are taken which will harm or may indirectly cause harm to the environment, and take steps to prevent pollution on the site.
- » Confine activities to the demarcated construction site.

An independent **Environmental Control Officer (ECO)** must be appointed by the project proponent prior to the commencement of any authorised activities and will be responsible for monitoring, reviewing and verifying compliance by the Contractor with the environmental specifications of the EMPr and the conditions of the Environmental Authorisation. Accordingly, the ECO will:

- » Be fully knowledgeable of the contents of the EIA.
- » Be fully knowledgeable of the contents of the conditions of the EA (once issued).
- » Be fully knowledgeable of the contents of the EMPr.
- » Be fully knowledgeable of the contents of all relevant environmental legislation, and ensure compliance therewith.
- » Be fully knowledgeable with the contents of all relevant licences and permits issued for the project.
- » Ensure that the contents of the EMPr are communicated to the Contractors site staff and that the Site Manager and Contractors are constantly made aware of the contents through ongoing discussion.
- » Ensure that compliance with the EMPr is monitored through regular and comprehensive inspection of the site and surrounding areas.
- » Ensure that the Site Manager has input into the review and acceptance of construction methods and method statements.
- » Ensure that activities on site comply with all relevant environmental legislation.
- » Ensure that a removal is ordered of any person(s) and/or equipment responsible for any contravention of the specifications of the EMPr.
- » Ensure that any non-compliance or remedial measures that need to be applied are reported.
- » Keep records of all activities on site, problems identified, transgressions noted and a task schedule of tasks undertaken by the ECO.
- » Independently report to the Department of Forestry, Fisheries and the Environment (DFFE) in terms of compliance with the specifications of the EMPr and conditions of the EA (once issued).
- » Keep records of all reports submitted to DFFE.

As a general mitigation strategy, the Environmental Control Officer (ECO) should be present for the site preparation and initial clearing activities to ensure the correct demarcation of no-go areas, facilitate environmental induction with construction staff and supervise any flora relocation and faunal rescue activities that may need to take place during the site clearing (i.e. during site establishment, and excavation of foundations). Thereafter, weekly site compliance inspections would probably be sufficient, which must be increased if required. The ECO will be supplemented with the EPC Contractor's/Project Company's Environmental Office (EO) who will be located on site on a daily basis and will guide the EPC Contractor's/Project Company's to ensure compliance with the environmental considerations. Therefore, in the absence of the ECO there will be a designated owner's environmental officer present to deal with any environmental issues that may arise such as fuel or oil spills. The ECO shall remain employed until all rehabilitation measures, as required for implementation due to construction damage, are completed and the site handed over for operation.

Contractor's Safety, Health and Environment Representative and/or Environmental Officer: The Contractor's Safety, Health and Environment (SHE) Representative, employed by the Contractor, is responsible for managing the day-to-day on-site implementation of this EMPr, and for the compilation of regular (usually weekly) Monitoring Reports. In addition, the SHE must act as liaison and advisor on all environmental and

related issues and ensure that any complaints received from the public are duly recorded and forwarded to the Site Manager and Contractor. In some instances, a separate Environmental Officer (EO) may be appointed to support this function.

The Contractor's Safety, Health and Environment Representative and/or Environmental Officer should:

- » Be well versed in environmental matters.
- » Understand the relevant environmental legislation and processes and the implementation thereof.
- » Understand the hierarchy of Environmental Compliance Reporting, and the implications of Non-Compliance.
- » Know the background of the project and understand the implementation programme.
- » Be able to resolve conflicts and make recommendations on site in terms of the requirements of this specification.
- » Keep accurate and detailed records of all EMPr-related activities on site. The EO shall keep a daily diary for monitoring the site specific activities as per project schedule.
- » Supervise any flora relocation and faunal rescue activities that may need to take place during the site clearing (i.e. during site establishment, and excavation of foundations) and therefore needs the relevant training/ experience. The EO will have overall responsibility for day-to day environmental management and implementation of mitigations.
- » The EO is responsible for reporting to the ECO on the day-to-day on-site implementation of this EMPr and other Project Permits/Authorisations.
- » Ensure or otherwise train and induct all contractor's employees prior to commencement of any works.
- » Ensure that there is daily communication with the Site Manager regarding the monitoring of the site.
- » Compilation of Weekly and Monthly Monitoring Reports to be submitted to the ECO and Site Manager.
- » In addition, the EO/ Environmental Representative must act as project liaison and advisor on all environmental and related issues and ensure that any complaints received from the public are duly recorded and forwarded to the Site Manager, ECO and Contractor(s).

Contractors and Service Providers: It is important that Contractors are aware of the responsibilities in terms of the relevant environmental legislation and the contents of this EMPr. The Contractor must appoint an Internal Environmental Officer (EO) who will be responsible for informing contractor employees and sub-contractors of their environmental obligations in terms of the environmental specifications, and for ensuring that employees are adequately experienced and properly trained in order to execute the works in a manner that will minimise environmental impacts. The Internal Environmental Officer and Contractor's obligations in this regard include the following:

- » Must be fully knowledgeable on all environmental features of the construction site and the surrounding environment.
- » Be fully knowledgeable with the contents and the conditions of the Environmental Authorisation.
- » Be fully knowledgeable with the contents with the EMPr.
- » Be fully knowledgeable of all the licences and permits issued for the site.
- » Ensure a copy of the Environmental Authorisation and EMPr is easily accessible to all on-site staff members.
- » Ensure contractor employees are familiar with the requirements of this EMPr and the environmental specifications as they apply to the construction of the proposed facility.
- » Ensure that prior to commencing any site works, all contractor employees and sub-contractors must have attended environmental awareness training included in the induction training which must provide

staff with an appreciation of the project's environmental requirements, and how they are to be implemented.

- » Ensure that any complaints received from the public are duly recorded and forwarded to the Site Manager and Contractor.
- » Manage the day-to-day on-site implementation of this EMPr, and the compilation of regular (usually weekly) Monitoring Reports.
- » Keep record of all activities on site, problems identified, transgressions noted and a task schedule of tasks undertaken, including those of the Independent ECO.
- » Inform staff of the environmental issues as deemed necessary by the Independent ECO.

All contractors (including sub-contractors and staff) and service providers are ultimately responsible for:

- » Ensuring adherence to the environmental management specifications.
- » Ensuring that Method Statements are submitted to the Site Manager (and ECO) for approval before any work is undertaken.
- » Ensuring that any instructions issued by the Site Manager on the advice of the ECO are adhered to.
- » Ensuring that a report is tabled at each site meeting, which will document all incidents that have occurred during the period before the site meeting.
- » Ensuring that a register is kept in the site office, which lists all transgressions issued by the ECO.
- » Ensuring that a register of all public complaints is maintained.
- » Ensuring that all employees, including those of sub-contractors, receive training before the commencement of construction in order for the sub-contractors to constructively contribute towards the successful implementation of the EMPr (i.e. ensure their staff are appropriately trained on the environmental obligations).

Community Liaison Officer (CLO) will represent the community and assist the Owner, Contractor and the Engineer with communication between them and the community. Inform community regarding the project details, safety precautions and programme. Duties and responsibilities of the community liaison officer include:

- » Be available at the site offices generally between the hours of 07:00 and 09:00 and again from 15:00 until end of working day. Normal working hours will be from 07:00 am till 17:00.
- » Maintain an up-to-date record of potential employees within the community and provide the contractor with copies of this information.
- » To identify, screen and nominate labour from the community in accordance with the Contractor's requirements and determine, in consultation with the Contractor, the needs of local labour for employment and relevant technical training, where applicable.
- » Liaise between Contractor and labour regarding wages and conditions of employment.
- » Communicate daily with the Contractor on labour related issues such as numbers and skills.
- » Identify possible labour disputes, unrest, strikes, etc., in advance and assist in their resolution.
- » Have a good working knowledge of the contents of the contract document regarding labour and training matters.
- » Attend all meetings at which the community and/or labour is represented or discussed.
- » Attend contract site meetings and report on community and labour issues at these meetings.
- » Co-ordinate and assist with the obtaining of information regarding the community's needs (questionnaires, etc.).
- » Inform local labour of their conditions of temporary employment, to ensure their timeous availability and to inform them timeously of when they will be relieved.

- » Ensure that all labour involved in activities when tasks have been set, are fully informed of the principle of task-based work.
- » Attend disciplinary proceedings to ensure that hearings are fair and reasonable.
- » Keep a daily written record of interviews and community liaison.
- » Arrange venues for training if required.
- » Assist with the training and education of the community regarding the correct usage of the services, where applicable.
- » Any other duties that may become necessary as the works progress.

6.2 Objectives

In order to meet the overall goal for construction, the following objectives, actions, and monitoring requirements have been identified.

OBJECTIVE 2: Minimise impacts related to inappropriate site establishment

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|-------------------------------------|---|
| Project Component/s | <ul style="list-style-type: none"> » Area infrastructure (i.e. PV panels,, inverters, transformers, switchgear and ancillary buildings). » Linear infrastructure (i.e. underground cabling, main access road and internal access roads and fencing). |
| Potential Impact | <ul style="list-style-type: none"> » Hazards to landowners and the public. » Damage to indigenous natural vegetation. » Loss of threatened plant species. » Visual impact of general construction activities, and the potential scarring of the landscape due to vegetation clearing and resulting erosion. |
| Activities/Risk Sources | <ul style="list-style-type: none"> » Any unintended or intended open excavations (foundations and cable trenches). » Movement of construction vehicles in the area and on-site. » Transport to and from the temporary construction area/s. |
| Mitigation: Target/Objective | <ul style="list-style-type: none"> » To secure the site against unauthorised entry. » To protect members of the public/landowners/residents. » No loss of or damage to sensitive vegetation in areas outside the immediate development footprint. » Minimal visual intrusion by construction activities and intact vegetation cover outside of the immediate construction work areas. |

| Mitigation: Action/Control | Responsibility | Timeframe |
|---|-------------------------|--|
| Secure site, working areas and excavations in an appropriate manner. | Contractor | Site establishment, and duration of construction |
| Ensure that no activities infringe on identified no-go and very high sensitivity areas. | Contractor | Duration of construction |
| The siting of the construction equipment camp/s must take cognisance of any sensitive areas identified in the EIA Report. | Contractor | Duration of construction |
| Ensure that vegetation is not unnecessarily cleared or removed during the construction phase. | Contractor | Site establishment, and duration of construction |
| All construction vehicles should adhere to clearly defined and demarcated roads. No off-road driving to be allowed outside of | Developer Contractor | Pre-construction Construction |

| Mitigation: Action/Control | Responsibility | Timeframe |
|--|----------------|---|
| the construction area. . | | |
| Contractor's Environmental Officer (EO) must provide supervision and oversight of vegetation clearing activities within sensitive areas. | Contractor | Construction |
| Ensure that rubble, litter, and disused construction materials are appropriately stored (if not removed daily) and then disposed regularly at licensed waste facilities. | Contractor | Construction |
| Reduce and control construction dust through the use of approved dust suppression techniques as and when required (i.e. whenever dust becomes apparent). | Contractor | Construction |
| Restrict construction activities to daylight hours in order to negate or reduce the visual impacts associated with lighting. | Contractor | Construction |
| The construction site must be fenced and security provided. | Contractor | Construction |
| Adequate protective measures must be implemented to prevent unauthorised access to the working area and the internal access routes. | Contractor | Construction |
| All unattended open excavations must be adequately demarcated and/or fenced. | Contractor | Construction |
| Establish appropriately bunded areas for storage of hazardous materials (e.g. fuel to be required during construction). | Contractor | Site establishment, and duration of construction |
| Visual impacts must be reduced during construction through minimising areas of surface disturbance, controlling erosion, using dust suppression techniques, and restoring exposed soil as closely as possible to their original contour and vegetation. | Contractor | Site establishment, and duration of construction |
| Cleared alien vegetation must not be dumped on adjacent intact vegetation during clearing but must be temporarily stored in a demarcated area. | Contractor | Site establishment, and duration of construction |
| Establish the necessary ablution facilities with chemical toilets and provide adequate sanitation facilities and ablutions for construction workers so that the surrounding environment is not polluted (at least one sanitary facility for each sex and for every 30 workers as per the 2014 Construction Regulations; Section 30(1) (b)) at appropriate locations on site). The facilities must be placed within the construction area and along the road. | Contractor | Site establishment, and duration of construction |
| Ablution or sanitation facilities must not be located within 100m from a watercourse or within the 1:100 year flood. | Contractor | Site establishment, and duration of construction |
| Supply adequate weather and vermin proof waste collection bins and skips (covered at minimum with secured netting or shade cloth) at the site where construction is being undertaken. Separate bins should be provided for general and hazardous waste. Provision should be made for separation of waste for recycling. | Contractor | Site establishment, and duration of construction |
| Foundations and trenches must be backfilled to originally excavated materials as much as possible. Excess excavation materials must be disposed of only in approved areas, or, if suitable, stockpiled for use in reclamation activities. | Contractor | Site establishment, and duration of construction and rehabilitation |
| Eskom's rights and services must be acknowledged and respected | Contractor | Site establishment, and |

| Mitigation: Action/Control | Responsibility | Timeframe |
|--|----------------|--|
| at all times. Eskom shall at all times retain unobstructed access to and egress from its servitudes. | | duration of construction, rehabilitation and operation |

| | |
|------------------------------|---|
| Performance Indicator | <ul style="list-style-type: none"> » Site is secure and there is no unauthorised entry. » No members of the public/ landowners injured. » Appropriate and adequate waste management and sanitation facilities provided at construction site. » Vegetation cover on and in the vicinity of the site is intact (i.e. full cover as per natural vegetation within the environment) with no evidence of degradation or erosion. |
|------------------------------|---|

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|-------------------|--|
| Monitoring | <ul style="list-style-type: none"> » An incident reporting system is used to record non-conformances to the EMPr. » EO and ECO to monitor all construction areas on a continuous basis until all construction is completed. Non-conformances will be immediately reported to the site manager. » Monitoring of vegetation clearing during construction (by contractor as part of construction contract). » Monitoring of rehabilitated areas quarterly for at least a year following the end of construction (by contractor as part of construction contract). |
|-------------------|--|

OBJECTIVE 3: Appropriate management of the construction site and construction workers

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|-------------------------------------|---|
| Project Component/s | <ul style="list-style-type: none"> » Area infrastructure (i.e. PV panels, BESS, inverters, transformers, switchgear and ancillary buildings). » Linear infrastructure (i.e. underground cabling, main access road and internal access roads and fencing). |
| Potential Impact | <ul style="list-style-type: none"> » Damage to indigenous natural vegetation and sensitive areas. » Damage to and/or loss of topsoil (i.e. pollution, compaction etc.). » Impacts on the surrounding environment due to inadequate sanitation and waste removal facilities. » Pollution/contamination of the environment. |
| Activities/Risk Sources | <ul style="list-style-type: none"> » Vegetation clearing and levelling of equipment storage area/s. » Access to and from the equipment storage area/s. » Ablution facilities. » Contractors not aware of the requirements of the EMPr, leading to unnecessary impacts on the surrounding environment. |
| Mitigation: Target/Objective | <ul style="list-style-type: none"> » Limit equipment storage within demarcated designated areas. » Ensure adequate sanitation facilities and waste management practices. » Ensure appropriate management of actions by on-site personnel in order to minimise impacts to the surrounding environment. |

| Mitigation: Action/Control | Responsibility | Timeframe |
|--|----------------|--------------|
| Restrict public access to works area including construction areas, laydown and storage sites via appropriate security. Only allow site access after appropriate induction and use of appropriate personal protective equipment | Contractors | Construction |
| Contractors and construction workers must be clearly informed of | Developer | Prior to the |

| Mitigation: Action/Control | Responsibility | Timeframe |
|--|---------------------------------|---|
| the no-go, very high and high sensitivity areas. | Contractor | commencement of construction |
| In order to minimise impacts on the surrounding environment, contractors must be required to adopt a certain Code of Conduct and commit to restricting construction activities to areas within the development footprint. Contractors and their sub-contractors must be familiar with the conditions of the Environmental Authorisation, the EIA Report, and this EMPr, as well as the requirements of all relevant environmental legislation. | Contractors | Construction |
| Contractors must ensure that all workers are informed at the outset of the construction phase of the conditions contained on the Code of Conduct. | Contractor and sub-contractor/s | Pre-construction |
| Introduce an incident reporting system to be tabled at weekly/monthly project meetings. | Contractor and sub-contractor/s | Pre-construction |
| All construction vehicles must adhere to clearly defined and demarcated roads. No driving outside of the development boundary must be permitted. | Contractor | Construction |
| Ensure all construction equipment and vehicles are properly maintained at all times. | Contractor | Construction |
| Restrict work activities that require power tools and plant that generates noise to normal working hours and limit such activities over weekends. | Contractor | Construction |
| Ensure that construction workers are clearly identifiable. All workers should carry identification cards and wear identifiable clothing. | Contractor | Construction |
| Appoint a community liaison officer to deal with complaints and grievances from the public. | Contractor | Construction |
| As far as possible, minimise vegetation clearing and levelling for equipment storage areas. | Contractor | Site establishment, and during construction |
| Ensure that operators and drivers are properly trained and make them aware, through regular toolbox talks, of any risk they may pose to the community and/or environment. | Contractor | Construction |
| Contact details of emergency services should be prominently displayed on site. | Contractor | Construction |
| Open fires on the site for heating, smoking or cooking are not allowed, except in designated areas. | Contractor | Construction |
| Contractor must provide adequate firefighting equipment on site and provide firefighting training to selected construction staff. | Contractor | Construction |
| Personnel trained in first aid should be on site to deal with smaller incidents that require medical attention. | Contractor | Construction |
| Road borders must be regularly maintained to ensure that vegetation remains short to serve as an effective firebreak. An emergency fire plan must be developed with emergency procedures in the event of a fire. | Contractor | Site establishment, and during construction |
| Encourage contractors and local people to report any suspicious activity associated with crime to the appropriate authorities. | Contractor | Construction |
| Ensure that the local municipalities, police, security companies, and policing forums are alerted to the increased construction | Contractor | Duration of Contract |

| Mitigation: Action/Control | Responsibility | Timeframe |
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| activities in the region and the risk it poses in respect of crime. | | |
| Ensure waste storage facilities are maintained and emptied on a regular basis. | Contractor | Site establishment, and duration of construction |
| No liquid waste, including grey water, may be discharged into any water body or drainage line. All sewage disposal to take place at a registered and operational wastewater treatment works. Proof of disposal to be retained as proof of responsible disposal. | Contractor | Maintenance: duration of contract within a particular area |
| Ensure that all personnel have the appropriate level of environmental awareness and competence to ensure continued environmental due diligence and on-going minimisation of environmental harm. This can be achieved through the provision of appropriate environmental awareness training to all personnel. Records of all training undertaken must be kept. | Contractor | Duration of construction |
| Ensure compliance with all national, regional and local legislation with regard to the storage, handling and disposal of hydrocarbons, chemicals, solvents and any other harmful and hazardous substances and materials. | Contractor | During construction. |
| Ensure ablution facilities are appropriately maintained. Ablutions must be cleaned regularly and associated waste disposed of at a registered/permitted waste disposal site. Ablutions must be removed from site when construction is completed. | Contractor and sub-contractor/s | Duration of contract |
| Cooking and eating of meals must take place in a designated area. No fires are allowed on site. No firewood or kindling may be gathered from the site or surrounds. | Contractor and sub-contractor/s | Duration of contract |
| All litter must be deposited in a clearly marked, closed, animal-proof disposal bin in the construction area. Particular attention needs to be paid to food waste. | Contractor and sub-contractor/s | Duration of contract |
| Keep a record of all hazardous substances stored on site. Clearly label all the containers storing hazardous waste. | Contractor | Duration of contract |
| A Method Statement should be compiled for the management of pests and vermin within the site, specifically relating to the canteen area if applicable. | Contractor | Construction |
| No disturbance of flora or fauna must be undertaken outside of the demarcated construction area/s. | Contractor and sub-contractor/s | Duration of contract |
| Fire-fighting equipment and training must be provided before the construction phase commences. | Contractor and sub-contractor/s | Duration of contract |
| Workers must be aware of the importance of watercourses and drainage systems (especially those located within and surrounding the project site) and the significance of not undertaking activities that could result in such pollution. | Contractor and EO | Pre-construction Construction |
| On completion of the construction phase, all construction workers must leave the site within one week of their contract ending. | Contractor and sub-contractor/s | Construction |
| When possible, no activity should be undertaken at the site between sunset and sunrise, except for security personnel guarding the development. | Contractor and sub-contractor/s | Construction |
| Keep record of all accidents or transgressions of safety in accordance with OHS Act and implement corrective action. | Contractor | Construction |

| Mitigation: Action/Control | Responsibility | Timeframe |
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| Implement an HIV/AIDS Awareness and Training Programme for the Contractor's workforce and if feasible the local community within two weeks of commencement of construction. Ensure that the HIV/AIDS Awareness and Training Programme is consistent with national guidelines and/or IFC's Good Practice. | Contractor | Construction |
| Provide voluntary and free counselling, free testing and condom distribution services. | Contractor | Construction |

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| Performance Indicator | <ul style="list-style-type: none"> » The construction camps and laydown areas have avoided sensitive areas. » Ablution and waste removal facilities are in a good working order and do not pollute the environment due to mismanagement. » All areas are rehabilitated promptly after construction in an area is complete. » Excess vegetation clearing and levelling is not undertaken. » No complaints regarding contractor behaviour or habits. » Appropriate training of all staff is undertaken prior to them commencing work on the construction site. » Code of Conduct drafted before commencement of the construction phase. » Compliance with OHS Act. |
| Monitoring | <ul style="list-style-type: none"> » Regular audits of the construction camps and areas of construction on site by the EO. » Proof of disposal of sewage at an appropriate licensed wastewater treatment works. » Proof of disposal of waste at an appropriate licensed waste disposal facility. » An incident reporting system should be used to record non-conformances to the EMPr. » Observation and supervision of Contractor practices throughout the construction phase by the EO. » Complaints are investigated and, if appropriate, acted upon. » Comprehensive record of accidents and incidence and related investigations, findings and corrective action in accordance with the OHS Act. |

OBJECTIVE 4: Maximise local employment, skills development and business opportunities associated with the construction phase

Employment opportunities will be created during the construction phase, specifically for semi-skilled and unskilled workers. Employment of locals and the involvement of local SMMEs would enhance the social benefits associated with the project, even if the opportunities are only temporary. The procurement of local goods could furthermore result in positive economic spin-offs.

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| Project Component/s | <ul style="list-style-type: none"> » Construction activities associated with the establishment of the PV facility. » Availability of required skills in the local communities for the undertaking of the construction activities. |
| Potential Impact | <ul style="list-style-type: none"> » The opportunities and benefits associated with the creation of local employment and business should be maximised. |
| Activities/Risk Sources | <ul style="list-style-type: none"> » Contractors who make use of their own labour for unskilled tasks, thereby reducing the employment and business opportunities for locals. » Sourcing of individuals with skills similar to the local labour pool outside the municipal area. » Unavailability of locals with the required skills resulting in locals not being employed and labour being sourced from outside the municipal area. » Higher skilled positions might be sourced internationally, where required. |

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| Enhancement: Target/Objective | <ul style="list-style-type: none"> » The contractor should aim to employ as many low-skilled and semi-skilled workers from the local area as possible. This should also be made a requirement for all contractors. » Employment of a maximum number of the low-skilled and/or semi-skilled workers from the local area where possible. » Appropriate skills training and capacity building. |
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| Mitigation: Action/Control | Responsibility | Timeframe |
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| Where feasible, effort must be made to employ locally in order to create maximum benefit for the communities. Ensure that the majority of the low-skilled workforce is recruited locally. | Contractor | Construction |
| Undertake a skills audit to determine level of skills and establish the development and training requirements. | Contractor | Construction |
| Commence with skill development programmes within the first month of construction | Contractor | Construction |
| Identify employment opportunities for women and ensure that women are employed on the construction site and are trained. | Contractor | Construction |
| Facilitate the transfer of knowledge between experienced employees and the staff. | Contractor | Construction |
| Identify opportunities for local businesses and ensure that the services from local businesses are prioritised. | Contractor | Construction |

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| Performance Indicator | <ul style="list-style-type: none"> » Composition of labour force and value of procurement from local businesses. » Level of skills imparted to local workforce. |
| Monitoring | <ul style="list-style-type: none"> » Human Resources and Finance function to monitor and report on through audits. |

OBJECTIVE 5: Protection of sensitive areas, flora, fauna and soils

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| Project Component/s | <ul style="list-style-type: none"> » PV panels. » Underground cabling. » Ancillary buildings. » Construction of the internal access roads. » BESS. |
| Potential Impact | <ul style="list-style-type: none"> » Impacts on natural vegetation, habitats and fauna (including avifauna). » Loss of indigenous natural vegetation due to construction activities. » Impacts on soil. » Loss of topsoil. » Erosion. |
| Activity/Risk Source | <ul style="list-style-type: none"> » Vegetation clearing. » Site preparation and earthworks. » Excavation of foundations. » Construction of infrastructure. » Site preparation (e.g. compaction). » Excavation of foundations. » Stockpiling of topsoil, subsoil and spoil material. |
| Mitigation: | <ul style="list-style-type: none"> » To minimise the development area as far as possible. |

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| Target/Objective | <ul style="list-style-type: none"> » To minimise impacts on surrounding sensitive areas. » To minimise impacts on soils. » Minimise spoil material. » Minimise erosion potential. |
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| Mitigation: Action/Control | Responsibility | Timeframe |
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| In order to minimise impacts on flora, fauna, and ecological processes, the development footprint should be limited to the minimum necessary to accommodate the required infrastructure. | Contractor | Duration of contract |
| Land clearance must only be undertaken immediately prior to construction activities. | Contractor | Construction |
| Retain and augment natural vegetation on all sides of the proposed project. | Contractor | Construction |
| During vegetation clearance, methods should be employed to minimise potential harm to fauna species. | Contractor | Construction |
| Prior and during vegetation clearance any larger fauna species noted should be given the opportunity to move away from the construction machinery. | Contractor | Construction |
| Areas to be cleared must be clearly marked on-site to eliminate the potential for unnecessary clearing. No vegetation removal must be allowed outside the designated project development footprint. Restrict construction activity to demarcated areas. | Contractor | Duration of Construction |
| Practical phased development and vegetation clearing must be practiced so that cleared areas are not left un-vegetated and vulnerable to erosion for extended periods of time. Where possible work should be restricted to one area at a time. | Contractor | Construction |
| Access to adjacent areas to be strictly controlled. | Developer Contractor | Pre-construction Construction |
| No harvesting of plants for firewood, medicinal or any other purposes are to be permitted | Contractor | Construction |
| No killing and poaching of any wild animal to be allowed. This should be clearly communicated to all employees, including subcontractors. | Contractor | Construction |
| Enforce ban on hunting, collecting etc. of all plants and animals or their products. | Contractor EO | Construction |
| No construction activity should occur near to active raptor nests should these be discovered prior to or during the construction phase. | Contractor | Construction |
| Areas beyond the development footprint should be expressly off limits to construction personnel and construction vehicles and this should be communicated to them. | Contractor | Construction |
| If trenches need to be dug for electrical cabling or other purpose, these should not be left open for extended periods of time as fauna may fall in and become trapped in them. Trenches which are standing open should have places where there are soil ramps allowing fauna to escape the trench. | Contractor | Construction |
| Any fauna threatened or injured during construction should be removed to safety by a suitably qualified person, or allowed to passively vacate the area. | Suitably qualified person | Construction |

| Mitigation: Action/Control | Responsibility | Timeframe |
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| A suitable perimeter fence should be constructed around the facility to restrict access of fauna to the site and to restrict/control access of staff to adjacent natural areas. No electrified strands should be placed within 30cm of the ground as some species such as tortoises are susceptible to electrocution from electric fences because they do not move away when electrocuted but rather adopt defensive behaviour and are killed by repeated shocks. Alternatively, the electrified strands should be placed on the inside of the fence and not the outside as is the case on the majority of already constructed PV plants. | Contractor | Construction |
| Education of employees on the conservation importance of natural areas and fauna must be provided. | Contractor | Construction |
| Access to high sensitivity and no-go areas to be restricted and controlled. This should be clearly communicated to all employees. | Contractor | Construction |
| All construction vehicles should adhere to clearly defined and demarcated roads | Contractor | Construction |
| No collecting of flora species to be permitted. | Contractor | Construction |
| Topsoil must be removed and stored separately from subsoil and must be reapplied where appropriate as soon as possible in order to encourage and facilitate rapid regeneration of the natural vegetation on cleared areas. | Contractor | Construction |
| Soil stockpiles must not exceed 2 m in height. | Contractor | Construction |
| Soil stockpiles must be dampened with dust suppressant or equivalent to prevent erosion by wind. | Contractor | Construction |
| Soil stockpiles must be located away from any waterway or preferential water flow path in the landscape, to minimise soil erosion from these | Contractor | Construction |
| All graded or disturbed areas which will not be covered by permanent infrastructure such as paving, buildings or roads must be stabilised using appropriate erosion control measures. | Contractor | Construction |
| A method statement must be developed and submitted to the engineer to deal with erosion issues prior to bulk earthworks operations commencing. | Contractor | Before and during construction |
| Stockpiles are not to be used as stormwater control features. | Contractor | Construction |
| Any stockpiling of materials may not exceed two metres in height to reduce materials being blown away during high wind velocity events. | Contractor | Construction |
| Any erosion problems within the development area as a result of the construction activities observed must be rectified immediately and monitored thereafter to ensure that they do not re-occur. | Contractor | Construction |
| Where vegetation is not re-establishing itself in areas where surface disturbance occurred, soil samples must be collected, analysed for pH levels, electrical conductivity (EC) and major plant nutrient levels (calcium, magnesium, potassium) and sodium. When vegetation re-establishment still remains unsatisfactory, the bulk density of the soil should be measured with a penetrometer to determine whether compaction is an issue. The results must be submitted to a professional soil or agricultural | Contractor Specialist | Construction |

| Mitigation: Action/Control | Responsibility | Timeframe |
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| scientist for recommendations on the amendment of the issue to ensure that the vegetation cover is established and erosion prevented. | | |
| Any signs of soil erosion on site should be documented (including photographic evidence and coordinates of the problem areas) and submitted to the management team for further action. | Contractor | Construction |
| During construction the contractor shall protect areas susceptible to erosion by installing appropriate temporary and permanent drainage works as soon as possible and by taking other measures necessary to prevent the surface water from being concentrated in streams and from scouring the slopes, banks or other areas. | Contractor | construction |
| Create energy dissipation at discharge areas to prevent scouring | Contractor | construction |
| Activity at the site must be reduced after large rainfall events when the soils are wet. No driving off of hardened roads should occur at any time and particularly immediately following large rainfall events. | Contractor | Construction |
| Silt traps or cut-off berms downslope of working areas should be used where there is a danger of topsoil or material stockpiles eroding and entering watercourses and other sensitive areas. | Contractor | Construction |
| Erosion control measures to be regularly maintained. | Contractor | Construction |
| Bush clearing of all bushes and trees taller than one meter; Ensure proper storm water management designs are in place. | Contractor | Construction |
| If any erosion occurs, corrective actions (erosion berms) must be taken to minimize any further erosion from taking place. | Contractor | Construction |
| If erosion has occurred, topsoil should be sourced and replaced and shaped to reduce the recurrence of erosion. | Contractor | Construction |
| Only the designated access routes are to be used to reduce any unnecessary compaction. | Contractor | Construction |
| Compacted areas are to be ripped to loosen the soil structure. | Contractor | Construction |
| The topsoil should be stripped by means of an excavator bucket, and loaded onto dump trucks. | Contractor | Construction |
| Topsoil is to be stripped when the soil is dry, as to reduce compaction. | Contractor | Construction |
| The handling of the stripped topsoil will be minimized to ensure the soil's structure does not deteriorate significantly | Contractor | Construction |
| Compaction of the removed topsoil must be avoided by prohibiting traffic on stockpiles. | Contractor | Construction |
| The stockpiles will be vegetated (details contained in rehabilitation plan) in order to reduce the risk of erosion, prevent weed growth and to reinstitute the ecological processes within the soil. | Contractor | Construction |
| Only the designated access routes are to be used to reduce any unnecessary compaction. | Contractor | Construction |
| Compacted areas are to be ripped to loosen the soil structure. | Contractor | Construction |
| Place the above cleared vegetation were the topsoil stockpiles are to be placed. | Contractor | Construction |

| Mitigation: Action/Control | Responsibility | Timeframe |
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| All construction vehicles must adhere to a low speed limit (40km/h) to avoid collisions with susceptible species such as snakes and tortoises. | Contractor | Construction Operation |
| Outside lighting should be designed to minimise impacts on fauna. | Contractor | Before construction |
| All night-lighting should use low-UV type lights (such as most LEDs), which do not attract insects. The lights should also be of types which are directed downward and do not result in large amounts of light pollution. | Contractor | Construction |
| Fluorescent and mercury vapour lighting should be avoided and sodium vapor (yellow) lights should be used wherever possible. | Contractor | Construction |
| In order to reduce low intensity noise levels, work areas need to be effectively screened to reduce or deflect noise. Engineering controls such as modifications to equipment or work areas to make it quieter, the acquisition of equipment designed to emit low noise and vibration, creation of noise barriers, proper maintenance of tools and equipment must be considered. Noise from vehicles and powered machinery and equipment on-site should not exceed the manufacturer's specifications, based on the installation of a silencer. Equipment should be regularly serviced. Attention should also be given to muffler maintenance and enclosure of noisy equipment. | Contractor | Construction |

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| Performance Indicator | <ul style="list-style-type: none"> » No disturbance outside of designated work areas. » Minimised clearing of existing vegetation. » Vegetation and habitat loss restricted to infrastructure footprint. » No poaching etc of fauna by construction personnel during construction. » Removal to safety of fauna encountered during construction » Low mortality of fauna due to construction machinery and activities » Topsoil appropriately stored, managed and rehabilitated. » Limited soil erosion around site. » No activity in restricted areas. » Minimal level of soil degradation. |
| Monitoring | <ul style="list-style-type: none"> » Contractor's Environmental Officer (EO) to provide supervision and oversight of vegetation clearing activities within sensitive areas such as near the pan. » Supervision of all clearing and earthworks. » Ongoing monitoring of erosion management measures within the site. » Monthly inspections of sediment control devices by the EO. » An incident reporting system will be used to record non-conformances to the EMPr. |

OBJECTIVE 6: Minimise impacts to avifauna

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| Project Component/s | <ul style="list-style-type: none"> » Any infrastructure or activity that will result in disturbance to natural areas » PV Panels |
| Potential Impact | <ul style="list-style-type: none"> » Vegetation clearance and associated impacts on faunal habitats. » Traffic to and from site. » Loss of avifauna due to interactions with humans and site infrastructure |
| Activity/Risk Source | <ul style="list-style-type: none"> » Site preparation and earthworks. » Construction-related traffic. » Foundations or plant equipment installation. » Mobile construction equipment. » Power lines and associated electrical infrastructure |
| Mitigation: Target/Objective | <ul style="list-style-type: none"> » To minimise footprints of habitat destruction » To minimise disturbance to (and death of) resident and visitor faunal and avifaunal species |

| Mitigation: Action/Control | Responsibility | Timeframe |
|---|---------------------|---|
| No development or construction activities to take place within the 3km Martial Eagle buffer area/exclusion zone | EPC Contractor | Site establishment & duration of contract |
| <p>A 12 month monitoring avifaunal register must be implemented at the start of construction and maintained by the ECO and EO and contain the following:</p> <ul style="list-style-type: none"> » Record of all avifaunal injuries and fatalities; » Time, location and GPS co-ordinates of such incidence; » Common and species name of individual; » Possible cause of incident; » Conservation status; and » Photographic evidence. <p>The EPC contractor must ensure that all subcontractors report avifaunal incidents to the ECO/ EPC immediately</p> | EPC Contractor/ ECO | Construction |

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| Performance Indicator | <ul style="list-style-type: none"> » Zero disturbance outside of designated work areas » Minimised clearing of existing/natural vegetation and habitats for avifauna » Limited impacts on avifaunal species (i.e. noted/recorded fatalities) » Identification of avifauna carcasses. |
| Monitoring | <ul style="list-style-type: none"> » Avifaunal monitoring to detect movement through the development footprint. » Construction phase avifauna monitoring to record movement and abundance through the development footprint. |

OBJECTIVE 7: Minimise the establishment and spread of alien invasive plants

Major factors contributing to invasion by alien invader plants include high disturbance activities and negative grazing practices. Consequences of this may include:

- » Loss of indigenous vegetation;
- » Change in vegetation structure leading to change in various habitat characteristics;
- » Change in plant species composition;
- » Change in soil chemical properties;
- » Loss of sensitive habitats;
- » Loss or disturbance to individuals of rare, endangered, endemic, and/or protected species;
- » Fragmentation of sensitive habitats;
- » Change in flammability of vegetation, depending on alien species; and
- » Hydrological impacts due to increased transpiration and runoff.

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| Project Component/s | <ul style="list-style-type: none"> » PV facility. » Access road. » Associated infrastructure. |
| Potential Impact | <ul style="list-style-type: none"> » Invasion of natural vegetation surrounding the site by declared weeds or invasive alien species. » Impacts on soil. » Impact on faunal habitats. » Degradation and loss of agricultural potential. |
| Activities/Risk Sources | <ul style="list-style-type: none"> » Transport of construction materials to site. » Movement of construction machinery and personnel. » Site preparation and earthworks causing disturbance to indigenous vegetation. » Construction of site access roads. » Stockpiling of topsoil, subsoil and spoil material. » Routine maintenance work – especially vehicle movement. |
| Mitigation: Target/Objective | <ul style="list-style-type: none"> » To significantly reduce the presence of weeds and eradicate alien invasive species. » To avoid the introduction of additional alien invasive plants to the site. » To avoid distribution and thickening of existing alien plants in the site. » To complement existing alien plant eradication programs in gradually causing a significant reduction of alien plant species throughout the site. |

| Mitigation: Action/Control | Responsibility | Timeframe |
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| Develop and implement an IAP Control and Eradication Programme. | Contractor | Construction |
| Avoid creating conditions in which alien plants may become established: <ul style="list-style-type: none"> » Keep disturbance of indigenous vegetation to a minimum. » Rehabilitate disturbed areas as quickly as possible. » Do not import soil from areas with alien plants. | Contractor | Construction |
| When alien plants are detected, these must be controlled and cleared using the recommended control measures for each species to ensure that the problem is not exacerbated or does not re-occur. | Contractor | Construction |
| All alien plant re-growth must be monitored and should it occur these plants should be eradicated | Contractor | Construction |
| Any alien and invasive vegetation removed should be taken to a registered landfill site to prevent the proliferation of alien and invasive species | Contractor | Construction |
| The use of herbicides and pesticides and other related | Contractor | Construction |

| Mitigation: Action/Control | Responsibility | Timeframe |
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| horticultural chemicals should be carefully controlled and only applied by personnel adequately certified to apply pesticides and herbicides. It must be ensured that WHO Recommended Classification of Pesticides by Hazard Class 1a (extremely hazardous) or 1b (highly hazardous) are not purchased, stored or used on site along with any other nationally or internationally similarly restricted/banned products. | | |

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| Performance Indicator | » Low abundance of alien plants. For each alien species: number of plants and aerial cover of plants within the site and immediate surroundings. |
| Monitoring | <ul style="list-style-type: none"> » On-going monitoring of area by EO during construction. » Annual audit of development footprint and immediate surroundings by qualified botanist. » If any alien invasive species are detected then the distribution of these should be mapped (GPS co-ordinates of plants or concentrations of plants), number of individuals (whole site or per unit area), age and/or size classes of plants and aerial cover of plants. » The results should be interpreted in terms of the risk posed to sensitive habitats within and surrounding the site. » The environmental manager/site agent should be responsible for driving this process. » Reporting frequency depends on legal compliance framework. |

OBJECTIVE 8: Minimise impacts on water resources

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| Project component/s | <ul style="list-style-type: none"> » Construction activities » Storage of dangerous goods. » Ablution facilities. » Compaction of soil. |
| Potential Impact | <ul style="list-style-type: none"> » Pollutants such as lime-containing (high pH) construction materials such as concrete, cement, grouts, etc. could be harmful to aquatic biota, particularly during low flows when dilution is reduced. » Removal of freshwater habitat. » Compaction of soils within and surrounding the watercourses. » Erosion of soils surrounding watercourses. » Potential proliferation of alien and invasive species within the watercourses |
| Activity/risk source | <ul style="list-style-type: none"> » Development of PV facility in close proximity to major washes » Increased hardened surfaces |
| Mitigation: Target/Objective | <ul style="list-style-type: none"> » Reduce potential loss of habitat and ecological structure » No incidents related to spills of chemicals and hazardous materials. » No release of contaminated water in watercourses including streams and pans. » No misbehaviour of construction workers (i.e. ablution activities, washing). |

| Mitigation: Action/control | Responsibility | Timeframe |
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| Highly sensitive major ephemeral washes and their associated buffer areas (30m) must be regarded as no-go areas for all construction activities apart from road construction/upgrading and laying of cables, and only where the use of existing access | Contractor | Construction |

| Mitigation: Action/control | Responsibility | Timeframe |
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| roads is not an option | | |
| The recommended buffer areas (30m) between the delineated freshwater resource features and proposed project activities must be maintained | Contractor | Construction |
| Where possible, reduce the footprint area of exposed ground during periods of high rainfall. Prioritise vegetation clearing for the winter months as far as possible. | Contractor | Construction |
| All bare areas, as a result of the development, must be revegetated with locally occurring species, to bind the soil and limit erosion potential. | Contractor | Construction |
| There must be reduced activity at the site after large rainfall events when the soils are wet. No driving off of hardened roads must occur immediately following large rainfall events until soils have dried out and the risk of bogging down has decreased. | Contractor | Construction |
| Stormwater run-off infrastructure must be maintained to mitigate both the flow and water quality impacts of any stormwater leaving the Solar PV site. | Contractor | Construction |

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| Performance Indicator | » No degradation and erosion of wash areas. |
| Monitoring | » Monitor management measures in place for protection of freshwater resources. |

OBJECTIVE 9: Appropriate Stormwater Management

The stormwater management is covered under the Pre-construction and Construction Phase management, but aspects thereof will also continue into the Operation Phase. It is important that the engineers and contractors responsible for the detailed design of the stormwater systems take into account the requirements of this EMPr, as well as the recommendations by the participating specialists.

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| Project Component/s | » Alteration of natural areas into hard surfaces impacting on the local hydrological regime of the area. |
| Potential Impact | » Poor stormwater management and alteration of the hydrological regime. |
| Activities/Risk Sources | » Placement of hard engineered surfaces. |
| Mitigation: Target/Objective | » Reduce the potential increase in surface flow velocities and the impact on localised drainage systems. |

| Mitigation: Action/Control | Responsibility | Timeframe |
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| Stormwater from hard stand areas, and roads must be managed using appropriate channels and swales when located within steep areas. | Contractor | Construction |
| Any stormwater within the site must be handled in a suitable manner, i.e. trap sediments, and reduce flow velocities | Contractor | Construction |

| Mitigation: Action/Control | Responsibility | Timeframe |
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| Stormwater run-off infrastructure must be maintained to mitigate both the flow and water quality impacts of any stormwater leaving the Solar PV site. | Contractor and Engineers | Construction |
| Stormwater control systems must be implemented to reduce erosion on the project site. | Contractor | Construction |
| Silt traps must be used where there is a danger of topsoil eroding and entering streams and other sensitive areas. | Contractor | Construction |

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| Performance Indicator | <ul style="list-style-type: none"> » No impacts due to runoff. » Minimise erosion as far as possible. » Appropriate storm water management system in place. |
| Monitoring | <ul style="list-style-type: none"> » Ongoing monitoring of erosion management measures within the site. » Monthly inspections of sediment control devices by the EO. » An incident reporting system will be used to record non-conformances to the EMPr. |

OBJECTIVE 10: Protection of heritage resources

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| Project Component/s | <ul style="list-style-type: none"> » PV facility. » Access roads. » Associated infrastructure. |
| Potential Impact | » Heritage objects or artefacts found on site are inappropriately managed or destroyed. |
| Activity/Risk Source | <ul style="list-style-type: none"> » Site preparation and earthworks. » Foundations or plant equipment installation. » Mobile construction equipment movement on site. |
| Mitigation: Target/Objective | » To ensure that any heritage objects found on site are treated appropriately and in accordance with the relevant legislation. |

| Mitigation: Action/control | Responsibility | Timeframe |
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| Contractors must be informed before construction starts on the possible types of heritage sites and cultural material they may encounter and the procedures to follow if they find sites. All staff should also be familiarised with procedures for dealing with heritage objects/sites. | Contractor, ESA and heritage specialist | Duration of contract, particularly during excavations |
| Environmental Officer (EO) to alert workers to the importance of reporting fossil bones seen on site and to the possibility of encountering human remains. | EO | Construction |
| Areas required to be cleared during construction must be clearly marked in the field to avoid unnecessary disturbance of adjacent areas. | Contractor | Construction |
| A chance find procedure must be developed and implemented in the event that archaeological or palaeontological resources are found. In the case where the proposed development activities bring these materials to the surface, work must cease and SAHRA must be contacted immediately. | Contractor Heritage specialist | Construction |

| Mitigation: Action/control | Responsibility | Timeframe |
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| Familiarise all staff and contractors with procedures for dealing with heritage objects/sites. | Heritage Specialist | Pre-construction |
| In the event that fossils resources are discovered during excavations, immediately stop excavation in the vicinity of the potential material. Mark (flag) the position and also spoil material that may contain fossils. Inform the site foreman and the EO. EO to inform the Developer; the Developer contacts the standby archaeologist and/or palaeontologist. EO to describe the occurrence and provide images by email. | Contractor and EO | Construction |
| If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule. If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule. | Contractor and EO | Construction |
| <p>The following conditions apply with regards to the appointment of specialists:</p> <ul style="list-style-type: none"> » a qualified archaeologist must be appointed to undertake the work in terms of the permit applied for as noted above; » If heritage resources are uncovered during the course of the development, a professional archaeologist or paleontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or paleontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA. | | |

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| Performance Indicator | <ul style="list-style-type: none"> » No disturbance outside of designated work areas. » All heritage items located are dealt with as per the legislative guidelines. |
| Monitoring | <ul style="list-style-type: none"> » Observation of excavation activities by the EO throughout construction phase. » Supervision of all clearing and earthworks. » Due care taken during earthworks and disturbance of land by all staff and any heritage objects found reported. » Appropriate permits obtained from SAHRA prior to the disturbance or destruction of heritage sites (if required). » An incident reporting system will be used to record non-conformances to the EMPr. |

OBJECTIVE 11: Management of dust and emissions to air

During the construction phase, limited gaseous or particulate emissions are anticipated from exhaust emissions from construction vehicles and equipment on-site, as well as vehicle entrained dust from the movement of vehicles on the main and internal access roads.

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| Project component/s | <ul style="list-style-type: none"> » PV facility. » Access roads. » Associated infrastructure. |
| Potential Impact | <ul style="list-style-type: none"> » Dust generation and particulates from vehicle movement to and on-site, foundation excavation, road construction activities, road maintenance activities, temporary stockpiles, and vegetation clearing affecting the surrounding residents and visibility. » Release of minor amounts of air pollutants (for example NO₂, CO and SO₂) from vehicles and construction equipment. |
| Activity/risk source | <ul style="list-style-type: none"> » Clearing of vegetation and topsoil. » Excavation, grading, scraping, levelling, digging, drilling and associated construction activities. » Transport of materials, equipment, and components on internal access roads and the associated increased traffic. » Vehicle movement on gravel roads. » Re-entrainment of deposited dust by vehicle movements. » Wind erosion from topsoil and spoil stockpiles and unsealed roads and surfaces. » Fuel burning vehicle and construction engines. |
| Mitigation: Target/Objective | <ul style="list-style-type: none"> » To ensure emissions from all vehicles and construction engines are minimised, where possible, for the duration of the construction phase. » To minimise nuisance to the community from dust emissions and to comply with workplace health and safety requirements for the duration of the construction phase. » Suppression of dust, pollution control and minimise dust generation. |

| Mitigation: Action/control | Responsibility | Timeframe |
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| Implement appropriate dust suppression measures on a regular basis along the access road and on the proposed site. | Contractor | Construction |
| Reduce and control construction dust using approved dust suppression techniques as and when required (i.e. whenever dust becomes apparent). | Contractor | Construction |
| Areas to be cleared in a progressive manner. Road surfaces and other infrastructure to be constructed as soon as possible after vegetation clearing in order to minimise exposed ground surfaces, specifically roads which carry traffic. | Contractor | Construction |
| Roads must be maintained to a manner that will ensure that nuisance to the community from dust emissions from road or vehicle sources is not visibly excessive. | Contractor | Construction |
| The site access road leading into the site should be hard surfaced for 40 m or more to reduce material carry into Western Arterial | Contractor | Construction |
| Appropriate dust suppressant must be applied on all gravel roads associated, exposed areas and stockpiles associated to | Contractor | Duration of contract |

| Mitigation: Action/control | Responsibility | Timeframe |
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| the project as required to minimise/control airborne dust. | | |
| Haul vehicles moving outside the construction site carrying material that can be wind-blown will be covered with suitable material tarpaulins shade cloth. | Contractor | Duration of contract |
| Ensure that vehicles used to transport sand and building materials are fitted with tarpaulins or covers. | Contractor | Duration of contract |
| Speed of construction vehicles must be restricted to 40km/hr on all roads within the site. | Contractor | Duration of contract |
| Dust-generating activities or earthworks may need to be rescheduled or the frequency of application of dust control/suppressant increased during periods of high winds if visible dust is blowing toward nearby residences outside the site. | Contractor | Duration of contract |
| Disturbed areas must be re-vegetated as soon as practicable in line with the progression of construction activities. | Contractor | Completion of construction |
| Vehicles and equipment must be maintained in a road-worthy condition at all times. | Contractor | Duration of contract |
| All vehicles and containers used for moving waste must encapsulate the waste, which prevents the waste from causing odours and from escaping or blowing around the site. This will also prevent leachate material from spilling out of the containers, which is hazardous. | Contractor | Duration of contract |
| Should a batching plant be required, this must be enclosed with shade cloth to reduce the amount of cement particulates/particles released into the environment. | Contractor | Duration of contract |

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| Performance Indicator | <ul style="list-style-type: none"> » No complaints from affected residents or community regarding dust or vehicle emissions. » Visual presence of dust and air quality. » Dust does not cause health (inhaling, eye irritation) and safety risks (low visibility). » Dust suppression measures implemented for all heavy vehicles that require such measures during the construction phase. » Drivers made aware of the potential safety issues and enforcement of strict speed limits when they are employed. » All heavy vehicles equipped with speed monitors before they are used in the construction phase in accordance with South African vehicle legislation. » Road worthy certificates in place for all heavy vehicles at outset of construction phase and up-dated on a monthly basis. » A complaints register must be maintained, in which any complaints from neighbouring farmers will be logged, and thereafter complaints will be investigated and, where appropriate, acted upon. |
| Monitoring | <p>Monitoring must be undertaken to ensure emissions are not exceeding the prescribed levels via the following methods:</p> <ul style="list-style-type: none"> » Immediate reporting by personnel of any potential or actual issues with nuisance dust or emissions to the Site Manager. » A complaints register must be maintained, in which any complaints from residents/the community will be logged, and thereafter complaints will be investigated and, where appropriate, acted upon. » An incident register and non-conformance must be used to record incidents and non- |

- conformances to the EMPr.
- » A complaints register must be used to record grievances by the public.

OBJECTIVE 12: Minimise impacts related to traffic management and transportation of equipment and materials to site

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| Project Component/s | » Delivery of any component required for the construction phase of the facility. |
| Potential Impact | <ul style="list-style-type: none"> » Impact of heavy construction vehicles on road surfaces, and possible increased risk in accidents involving people and animals. » Traffic congestion, particularly on narrow roads or on road passes where overtaking is not permitted. » Deterioration of road pavement conditions (both surfaced and gravel road) due to abnormal loads. |
| Activities/Risk Sources | <ul style="list-style-type: none"> » Construction vehicle movement. » Speeding on local roads. » Degradation of local road conditions. » Site preparation and earthworks. » Foundations or plant equipment installation. » Transportation of ready-mix concrete to the site. » Mobile construction equipment movement on-site. |
| Mitigation: Target/Objective | <ul style="list-style-type: none"> » Minimise impact of traffic associated with the construction of the facility on local traffic volumes, existing infrastructure, property owners, animals, and road users. » To minimise potential for negative interaction between pedestrians or sensitive users and traffic associated with the facility construction. » To ensure all vehicles are roadworthy and all materials/equipment are transported appropriately and within any imposed permit/licence conditions. |

| Mitigation: Action/Control | Responsibility | Timeframe |
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| Adequate and strategically placed traffic warning signs and control measures must be implemented along the R27 and gravel access roads (including the Soafskolk road) to warn road users of the construction activities taking place for the duration of the construction phase. Warning signs must be visible at all times, and especially at night. Signage must be maintained throughout the construction phase. | Contractor | Pre-construction |
| Undertake regular maintenance of gravel roads by the Contractor during the construction phase. | Contractor | Construction |
| Implement penalties for reckless driving as a way to enforce compliance to traffic rules. | Contractor | Construction |
| The developer and EPC Contractor must ensure that the roads utilised for construction activities are either maintained in the present condition or upgraded if damaged (i.e. wear and tear) due to construction activities. | Developer Contractor | Construction |
| Should abnormal loads have to be transported by road to the site, a permit must be obtained from the relevant Provincial Government. Alert traffic authorities well in advance of any heavy loads that will be transported on local roads and elicit their assistance in controlling traffic associated with the transportation of | Contractor appointed transportation contractor) | (or Pre-construction |

| Mitigation: Action/Control | Responsibility | Timeframe |
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| these loads. | | |
| Ensure that, at all times, people have access to their properties as well as to social facilities. | Developer Contractor | Construction |
| Limit the need for transportation over long distances by sourcing as much materials and goods as is feasible from local suppliers. | Contractor | Construction |
| Heavy vehicles used for construction purposes should be inspected regularly to ensure their road-worthiness. | Contractor | Construction |
| Strict vehicle safety standards should be implemented and monitored. | Contractor | Construction |
| No deviation from approved transportation routes must be allowed, unless roads are closed for whatever reason outside the control of the contractor. | Contractor | Construction |
| Appropriate road management strategies must be implemented on external and internal roads with all employees and contractors required to abide by standard road and safety procedures. | Contractor (or appointed transportation contractor) | Construction |
| Heavy construction vehicles should be restricted to off-peak periods. Schedule the delivery hours to avoid peak hour traffic, weekends and evenings and stagger component delivery to site. | Contractor | Construction |
| Staff and general trips to the site should occur outside of peak traffic periods. | Contractor | Construction |
| Any traffic delays expected because of construction traffic must be co-ordinated with the appropriate authorities. | Contractor | Construction |
| When upgrading, constructing and maintaining the access road ensure that proper hazard warnings signage and traffic control mechanisms such as flags men and traffic control barriers, chevrons and traffic cones separating the road from the worksite are in place at all times | Contractor | Construction |
| Visible signage must be established at appropriate points warning of turning traffic and the construction site (all signage to be in accordance with prescribed standards). Signage must be appropriately maintained throughout the construction period. | Contractor | Construction |
| All vehicles of the contractor travelling on public roads must adhere to the specified speed limits and all drivers must be in possession of an appropriate valid driver's license. | Contractor | Construction |
| All construction vehicles must remain on properly demarcated roads. No off-road driving to be allowed. | Contractor | Construction |
| The contractors must ensure that there is a dedicated access and an access control point to the site. | Contractor | Construction |
| Provide clearly defined roadway, parking and pedestrian walkway areas within the site with adequate lighting | Contractor | Construction |
| Partner with local municipalities and other prominent users of the local roads to upgrade them to meet the required capacity and intensity of the vehicles related to the planned construction activities. | Contractor | Construction |
| Provide public transportation service for workers in order to reduce congestion on roads. | Contractor | Construction |
| All construction vehicles must be road worthy. | Contractor | Construction |

| Mitigation: Action/Control | Responsibility | Timeframe |
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| All construction vehicle drivers must have the relevant licenses of the use of the vehicles and need to strictly adhere to the rules of the road. | Contractor | Construction |
| Heavy construction vehicles should be restricted to off-peak periods. | Contractor | Construction |
| Abnormal load vehicles require specific permit for transporting loads, and require liaison with relevant road authorities to ensure route suitability. | Contractor | Construction |

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| Performance Indicator | <ul style="list-style-type: none"> » Vehicles keeping to the speed limits. » Vehicles are in good working order and safety standards are implemented. » Local residents and road users are aware of vehicle movements and schedules. » No construction traffic related accidents are experienced. » Local road conditions and road surfaces are up to standard. » Complaints of residents are not received (e.g. concerning the speeding of heavy vehicles). |
| Monitoring | <ul style="list-style-type: none"> » Developer and or appointed EO must monitor indicators listed above to ensure that they have been implemented. |

OBJECTIVE 13: Appropriate handling and management of waste

The construction of the PV3 will involve the generation of various wastes. In order to manage the wastes effectively, guidelines for the assessment, classification, and management of wastes, along with industry principles for minimising construction wastes must be implemented. The main wastes expected to be generated by the construction activities include:

- » general solid waste
- » hazardous waste
- » inert waste (rock and soil)
- » liquid waste (including grey water and sewage)

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| Project Component/s | <ul style="list-style-type: none"> » PV facility. » Access roads. » Associated infrastructure. |
| Potential Impact | <ul style="list-style-type: none"> » Inefficient use of resources resulting in excessive waste generation. » Litter or contamination of the site or water through poor waste management practices. |
| Activity/Risk Source | <ul style="list-style-type: none"> » Packaging. » Other construction wastes. » Hydrocarbon use and storage. » Spoil material from excavation, earthworks and site preparation. |
| Mitigation: Target/Objective | <ul style="list-style-type: none"> » To comply with waste management legislation. » To minimise production of waste. » To ensure appropriate waste storage and disposal. » To avoid environmental harm from waste disposal. » A waste manifests should be developed for the ablutions showing proof of disposal of sewage at appropriate water treatment works. |

| Mitigation: Action/Control | Responsibility | Timeframe |
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| Construction method and materials should be carefully considered in view of waste reduction, re-use, and recycling opportunities. | Contractor | Duration of contract |
| Construction contractors must provide specific detailed waste management plans to deal with all waste streams. | Contractor | Duration of contract |
| Ensure that no litter, refuse, wastes, rubbish, rubble, debris and builders wastes generated on the premises be placed, dumped or deposited on adjacent/surrounding properties, and that the waste is disposed of at dumping site as approved by the Council. | Contractor | Duration of contract |
| Waste disposal at the construction site must be avoided by separating and trucking out of waste. | Contractor | Construction |
| Specific areas must be designated on-site for the temporary management of various waste streams, i.e. general refuse, construction waste (wood and metal scrap), and contaminated waste as required. Location of such areas must seek to minimise the potential for impact on the surrounding environment, including prevention of contaminated runoff, seepage, and vermin control. | Contractor | Duration of contract |
| Where practically possible, construction and general wastes on-site must be reused or recycled. Bins and skips must be available on-site for collection, separation, and storage of waste streams (such as wood, metals, general refuse etc.). | Contractor | Duration of contract |
| Disposal of waste must be in accordance with relevant legislative requirements, including the use of licensed contractors. | Contractor | Duration of contract |
| Uncontaminated waste must be removed at least weekly for disposal, if feasible; other wastes must be removed for recycling/ disposal at an appropriate frequency. | Contractor | Duration of contract |
| Hydrocarbon waste must be contained and stored in sealed containers within an appropriately bunded area and clearly labelled. | Contractor | Duration of contract |
| Waste must be kept to a minimum and must be transported by approved waste transporters to sites designated for their disposal. | Contractor | Duration of contract |
| No liquid waste, including grey water, may be discharged into any water body or drainage line. All sewage disposal to take place at a registered and operational wastewater treatment works. Slips of disposal to be retained as proof of responsible disposal. | Contractor | Maintenance: duration of contract within a particular area |
| All liquid wastes should be contained in appropriately sealed vessels/ponds within the footprint of the development, and be disposed of at a designated waste management facility after use. | Contractor | Duration of contract |
| Ensure compliance with all national, regional and local legislation with regard to the storage, handling and disposal of hydrocarbons, chemicals, solvents and any other harmful and hazardous substances and materials. The onus is on the Contractor to identify and interpret the applicable legislation. Hazardous waste to be disposed of at a registered landfill site. | Contractor | During and post construction. |
| Documentation (waste manifest) must be maintained detailing the quantity, nature, and fate of any regulated waste. Waste disposal records must be available for review at any time. | Contractor | Duration of contract |
| SABS approved spill kits to be available and easily accessible. | Contractor | Duration of contract |

| Mitigation: Action/Control | Responsibility | Timeframe |
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| Regularly serviced chemical toilet facilities and/or septic tank must be used to ensure appropriate control of sewage. | Contractor | Duration of contract |
| Daily inspection of all chemical toilets and septic tanks must be performed by environmental representatives on site. | Contractor | Duration of contract |
| In the event where sewage is discharged into the environment, all contaminated vegetation/ rock and soil must be removed immediately and treated as hazardous waste. | Contractor | Duration of construction |
| Ensure that the below ground storage of the septic tank can withstand the external forces of the surrounding pressure. The area above the tank must be demarcated to prevent any vehicles or heavy machinery from driving around the tank. | Contractor | Duration of construction |
| Under no circumstances may waste be burnt on site. | Contractor | Duration of construction |
| Where a registered waste site is not available close to the construction site, provide a method statement with regard to waste management. | Contractor | Duration of construction |
| Waste manifests must be provided for all waste streams generated on site, and must be kept on site. | Contractor | Duration of construction |
| Implement an integrated waste management approach that is based on waste minimisation and incorporates reduction, recycling, re-use and disposal where appropriate. Where solid waste is disposed of, such disposal shall only occur at a landfill licensed in terms of section 20(b) of the National Environmental Management Waste Act, 2008 (Act 59 of 2008). | Contractor | Duration of construction |
| Upon the completion of construction, the area must be cleared of potentially polluting materials. Spoil stockpiles must also be removed and appropriately disposed of or the materials re-used for an appropriate purpose. | Contractor | Completion of construction |
| Upon the completion of construction, all sanitation facilities (including chemical toilets) must be removed, as well as the associated waste to be disposed of at a registered waste disposal site. | Contractor | Completion of construction |
| Litter generated by the construction crew must be collected in rubbish bins and disposed of weekly, or at an appropriate frequency, at registered waste disposal sites. | Contractor | Duration of construction |
| All building rubble, solid and liquid waste etc. generated during the construction activities must be disposed of as necessary at an appropriately licensed refuse facility. | Contractor | Duration of construction |
| Ensure that no refuse wastes are burnt on the premises or on surrounding premises. No fires will be allowed on site. | Contractor | Duration of construction |
| Ensure that no litter, refuse, wastes, rubbish, rubble, debris and builders wastes generated on the premises be placed, dumped or deposited on adjacent/surrounding properties during or after the construction period of the project and that the waste is disposed of at dumping site as approved by the Council. | Contractor | Duration of construction |

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| Performance Indicator | <ul style="list-style-type: none"> » No complaints received regarding waste on site or indiscriminate dumping. » Internal site audits ensuring that waste segregation, recycling and reuse is occurring appropriately. » Provision of all appropriate waste manifests for all waste streams. |
| Monitoring | <ul style="list-style-type: none"> » Observation and supervision of waste management practices throughout construction phase. » Waste collection will be monitored on a regular basis. » Waste documentation completed. » Proof of disposal of sewage at an appropriate wastewater treatment works. » A complaints register will be maintained, in which any complaints from the community will be logged. Complaints will be investigated and, if appropriate, acted upon. » An incident reporting system will be used to record non-conformances to the EMPr. |

OBJECTIVE 14: Appropriate handling and storage of chemicals and/or hazardous substances

The construction phase may involve the storage and handling of a variety of chemicals including adhesives, abrasives, oils and lubricants, paints and solvents.

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| Project Component/s | <ul style="list-style-type: none"> » Laydown areas. » Temporary hydrocarbon and chemical storage areas. |
| Potential Impact | <ul style="list-style-type: none"> » Release of contaminated water from contact with spilled chemicals. » Generation of contaminated wastes from used chemical containers. » Soil pollution. |
| Activity/Risk Source | <ul style="list-style-type: none"> » Vehicles associated with site preparation and earthworks. » Construction activities of area and linear infrastructure. » Hydrocarbon spills by vehicles and machinery during levelling, vegetation clearance and transport of workers, materials and equipment and fuel storage tanks. » Accidental spills of hazardous chemicals. » Polluted water from wash bays and workshops. » Pollution from concrete mixing. |
| Mitigation: Target/Objective | <ul style="list-style-type: none"> » To ensure that the storage and handling of chemicals and hydrocarbons on-site does not cause pollution to the environment or harm to persons. » To ensure that the storage and maintenance of machinery on-site does not cause pollution of the environment or harm to persons. » Prevent and contain hydrocarbon leaks. » Undertake proper waste management. » Store hazardous chemicals safely in a bunded area. |

| Mitigation: Action/Control | Responsibility | Timeframe |
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| Implement an emergency preparedness plan during the construction phase. | Contractor | Duration of Contract |
| Any liquids stored on site, including fuels and lubricants, should be stored in accordance with applicable legislation. | Contractor | Duration of Contract |
| Spill kits must be made available on-site for the clean-up of spills | Contractor | Duration of contract |

| Mitigation: Action/Control | Responsibility | Timeframe |
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| and leaks of contaminants. | | |
| Losses of fuel and lubricants from the oil sumps and steering racks of vehicles and equipment must be contained using a drip tray with plastic sheeting filled with absorbent material when not parked on hard standing. | Contractor | Construction |
| Establish an appropriate Hazardous Stores which is in accordance with the Hazardous Substance Amendment Act, No. 53 of 1992. This should include but not be limited to: <ul style="list-style-type: none"> » Designated area; » All applicable safety signage; » Firefighting equipment; » Enclosed by an impermeable bund; » Protected from the elements, » Lockable; » Ventilated; and » Has adequate capacity to contain 110% of the largest container contents. | Contractor | Duration of Contract |
| Corrective action must be undertaken immediately if a complaint is made, or potential/actual leak or spill of polluting substance identified. This includes stopping the contaminant from further escaping, cleaning up the affected environment as much as practically possible and implementing preventive measures. Where required, a NEMA Section 30 report must be submitted to DFFE within 14 days of the incident. | Contractor | Duration of contract |
| In the event of a major spill or leak of contaminants, the relevant administering authority must be immediately notified as per the notification of emergencies/incidents. | Contractor | Duration of contract |
| Spilled concrete must be cleaned up as soon as possible and disposed of at a suitably licensed waste disposal site. Check vehicles and machinery daily for oil, fuel and hydraulic fluid leaks and undertake regular high standard maintenance on vehicles. | Contractor | Duration of contract |
| Accidental spillage of potentially contaminating liquids and solids must be cleaned up immediately in line with procedures by trained staff with the appropriate equipment. | Contractor | Duration of contract |
| Any contaminated/polluted soil removed from the site must be disposed of at a licensed hazardous waste disposal facility. | Contractor | Duration of contract |
| Routine servicing and maintenance of vehicles must not to take place on-site (except for emergencies). If repairs of vehicles must take place, an appropriate drip tray must be used to contain any fuel or oils. | Contractor | Duration of contract |
| All stored fuels to be maintained within an appropriate bund and on a sealed surface as per the requirements of SABS 089:1999 Part 1 and any relevant by-laws. | Contractor | Duration of contract |
| Fuel storage areas must be inspected regularly to ensure bund stability, integrity, and function. | Contractor | Duration of contract |
| Construction machinery must be stored in an appropriately sealed area. | Contractor | Duration of contract |
| The storage of flammable and combustible liquids such as oils will be in designated areas which are appropriately bunded, and | Contractor | Duration of contract |

| Mitigation: Action/Control | Responsibility | Timeframe |
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| stored in compliance with Material Safety Data Sheets (MSDS) files. | | |
| Any storage and disposal permits/approvals which may be required must be obtained, and the conditions attached to such permits and approvals will be compiled with. | Contractor | Duration of contract |
| Transport of all hazardous substances must be in accordance with the relevant legislation and regulations. | Contractor | Duration of contract |
| The sediment control and water quality structures used on-site must be monitored and maintained in an operational state at all times. | Contractor | Duration of contract |
| An effective monitoring system must be put in place to detect any leakage or spillage of all hazardous substances during their transportation, handling, installation and storage. | Contractor | Construction |
| Precautions must be in place to limit the possibility of oil and other toxic liquids from entering the soil or clean stormwater system. | Contractor | Construction |
| As much material must be pre-fabricated and then transported to site to avoid the risks of contamination associated with mixing, pouring and the storage of chemicals and compounds on site. | Contractor | Construction |
| All chemicals and toxicants used during construction must be stored in bunded areas. | Contractor | Construction |
| All machinery and equipment should be inspected regularly for faults and possible leaks, these should be serviced off-site (pre-use inspection). | Contractor | Construction |
| All servicing and re-fuelling of machines and equipment must either take place off-site, or in controlled and bunded working areas. | Contractor | Construction |
| Have appropriate action plans on site, and training for contactors and employees in the event of spills, leaks and other potential impacts to the aquatic systems. All waste generated on-site during construction must be adequately managed. | Contractor | Construction |
| Should a chemical spill take place, an aquatic ecologist must be contracted to identify the extent of the impact and assist with additional mitigation measures. | Contractor | Construction |
| Minimise fuels and chemicals stored on site. | Contractor | Construction |
| Install bunds on storage areas and take other precautions to reduce the risk of spills. | Contractor | Construction |
| Implement a contingency plan to handle spills, so that environmental damage is avoided. | Contractor | Construction |
| No refuelling, servicing of plant/equipment or chemical substance storage allowed outside of designated areas. | Contractor | Construction |
| Drip trays should be used during all fuel/chemical dispensing. | Contractor | Construction |
| Drip trays to be placed beneath standing machinery/plant. | Contractor | Construction |
| In the case of petrochemical spillages, the spill should be collected immediately and stored in a designated area until it can be disposed of in accordance with the Hazardous Chemical Substances Regulations, 1995 (Regulation 15). | Contractor | Construction |
| Implement a regional (industrial area-wide) emergency response | Contractor | Construction |

| Mitigation: Action/Control | Responsibility | Timeframe |
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| plan with involvement by the local authorities as well as alarms and communication systems which allow for fast and effective communication to neighbouring facilities. The area around the site is sparsely populated, so any impact would not be experienced by a large number of people. | | |

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| Performance Indicator | <ul style="list-style-type: none"> » No chemical spills outside of designated storage areas. » No water or soil contamination by spills. » No complaints received regarding waste on site or indiscriminate dumping. » Safe storage of hazardous chemicals. » Proper waste management. |
| Monitoring | <ul style="list-style-type: none"> » Observation and supervision of chemical storage and handling practices and vehicle maintenance throughout construction phase. » A complaints register must be maintained, in which any complaints from the community will be logged. » An incident reporting system will be used to record non-conformances to the EMPr. » On-going visual assessment to detect polluted areas and the application of clean-up and preventative procedures. » Monitor hydrocarbon spills from vehicles and machinery during construction continuously and record volume and nature of spill, location and clean-up actions. » Monitor maintenance of drains and intercept drains weekly. » Analyse soil samples for pollution in areas of known spills or where a breach of containment is evident when it occurs. » Records of accidental spills and clean-up procedures and the results thereof must be audited on an annual basis by the ECO. » Records of all incidents that caused chemical pollution must be kept and a summary of the results must be reported to management annually. |

OBJECTIVE 15: Effective management of concrete batching plant

Concrete is required during the construction of the PV facility. In this regard there could be a need to establish a batching plant within the site. Turbid and highly alkaline wastewater, dust emissions and noise are the key potential impacts associated with concrete batching plants. Concrete batching plants, cement, sand and aggregates can produce dust. Potential pollutants in batching plant wastewater and storm water include cement, sand, aggregates, chemical additive mixtures, fuels and lubricants.

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| Project component/s | <ul style="list-style-type: none"> » Batching plant. » Stormwater system. |
| Potential Impact | <ul style="list-style-type: none"> » Dust emissions. » Release of contaminated water. » Generation of contaminated wastes from used chemical containers. » Inefficient use of resources resulting in excessive waste generation. |
| Activity/risk source | <ul style="list-style-type: none"> » Operation of the batching plant. » Packaging and other construction wastes. » Hydrocarbon use and storage. |

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| Mitigation: Target/Objective | » To ensure that the operation of the batching plant does not cause pollution to the environment or harm to persons. |
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| Mitigation: Action/control | Responsibility | Timeframe |
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| Concrete batching plants should be sited such that impacts on the environment or the amenity of the local community from noise, odour or polluting emissions are minimised. | Contractor | Construction phase |
| Concrete batching plants should be sited away from identified sensitive areas. | Contractor | Construction phase |
| Where there is a regular movement of vehicles, access and exit routes for heavy transport vehicles should be planned to minimise noise and dust impacts on the environment. | Contractor | Construction phase |
| Good maintenance practices must be implemented, including regular sweeping to prevent dust build-up. | Contractor | Construction phase |
| The prevailing wind direction should be considered to ensure that bunkers and conveyors are sited in a sheltered position to minimise the effects of the wind. | Contractor | Construction phase |
| Aggregate material should be delivered in a damp condition, and water sprays or a dust suppression agent should be correctly applied to reduce dust emissions and reduce water usage. | Contractor | Construction phase |
| Process wastewater collected from the entire batching plant area should be diverted to an impervious settling tank or pond. Water should be reused in the concrete batching process, where possible. | Contractor | Construction phase |
| A contaminated storm water system must be specifically designed for the batching plant to ensure effective control of contaminated storm water originating from the batching plant and prevent contamination to the surrounding environment. | Contractor | Construction phase |
| Where possible, waste concrete should be used for construction purposes at the batching plant or project site. | Contractor | Construction phase |
| Artificial wind barriers must be installed around the batching plant to minimise air, land and water pollution. Wind barriers must enclose the entire batching plant and not allow fly ash and other dusts from moving through the barrier. The artificial barrier must be maintained daily for any defects and corrected when necessary. | Contractor | Pre-construction/ construction |
| The concrete wash bay structure must be constructed in a double brick arrangement or be reinforced to maintain its integrity throughout operation. | Contractor | Construction phase |

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| Performance Indicator | <ul style="list-style-type: none"> » No complaints regarding dust » No water or soil contamination by chemical spills » No complaints received regarding waste on site or indiscriminate dumping |
| Monitoring | <ul style="list-style-type: none"> » Observation and supervision of chemical storage and handling practices and vehicle maintenance throughout construction phase. » A complaints register will be maintained, in which any complaints from the community will be logged. Complaints will be investigated and, if appropriate, acted upon. » An incident and non-conformance register will be used to record incidents and non-conformances to the EMPr. |

- » The appointed ECO must monitor indicators listed above to ensure that they have been met for the construction phase.

6.3 Detailing Method Statements

OBJECTIVE 16: Ensure all construction activities are undertaken with the appropriate level of environmental awareness to minimise environmental risk

The environmental specifications are required to be underpinned by a series of Method Statements, within which the Contractors and Service Providers are required to outline how any identified environmental risks will practically be mitigated and managed for the duration of the contract, and how specifications within this EMPr will be met. That is, the Contractor will be required to describe how specified requirements will be achieved through the submission of written Method Statements to the Site Manager and ECO.

A Method Statement is defined as "a written submission by the Contractor in response to the environmental specification or a request by the Site Manager, setting out the plant, materials, labour and method the Contractor proposes using to conduct an activity, in such detail that the Site Manager is able to assess whether the Contractor's proposal is in accordance with the Specifications and/or will produce results in accordance with the Specifications". The Method Statement must cover applicable details with regard to:

- » Responsible person/s;
- » Construction procedures;
- » Materials and equipment to be used;
- » Getting the equipment to and from site;
- » How the equipment/material will be moved while on-site;
- » How and where material will be stored;
- » The containment (or action to be taken if containment is not possible) of leaks or spills of any liquid or material that may occur;
- » Timing and location of activities;
- » Compliance/non-compliance with the Specifications; and
- » Any other information deemed necessary by the Site Manager.

Method Statements must be compiled for all activities which affect any aspect of the environment and should be applied consistently to all activities. Specific areas to be addressed in the method statement: pre, during and post construction include:

- » Site establishment (which explains all activities from induction training to offloading, construction sequence for site establishment and the different amenities and to be established etc. Including a site camp plan indicating all of these).
- » Preparation of the site (i.e. clearing vegetation, compacting soils and removing existing infrastructure and waste).
- » Soil management/stockpiling and erosion control.
- » Excavations and backfilling procedure.

- » Stipulate norms and standards for water supply and usage (i.e.: comply strictly to licence and legislation requirements and restrictions).
- » Storm water method statement.
- » Ablution facilities (placement, maintenance, management and servicing).
- » Solid Waste Management:
 - * Description of the waste storage facilities (on site and accumulative).
 - * Placement of waste stored (on site and accumulative).
 - * Management and collection of waste process.
 - * Recycle, re-use and removal process and procedure.
- » Liquid waste management.
- » Design, establish, maintain and operate suitable pollution control facilities necessary to prevent discharge of water containing polluting matter or visible suspended materials into the surrounding environment. Should grey water (i.e. water from basins, showers, baths, kitchen sinks etc.) need to be disposed of, link into an existing facility where possible. Where no facilities are available, grey water runoff must be controlled to ensure no seepage into the surrounding environment occurs.
- » Dust and noise pollution:
 - * Describe the necessary measures to ensure that noise from construction activities is maintained within lawfully acceptable levels.
 - * Procedure to control dust at all times on the site, access roads and spoil sites (dust control shall be sufficient so as not to have significant impacts in terms of the biophysical and social environments). These impacts include visual pollution, decreased safety due to reduced visibility, negative effects on human health and the ecology due to dust particle accumulation.
- » Hazardous substance storage (ensure compliance with all national, regional and local legislation with regard to the storage of oils, fuels, lubricants, solvents, wood treatments, bitumen, cement, pesticides and any other harmful and hazardous substances and materials. South African National Standards apply).
 - * Lists of all potentially hazardous substances to be used.
 - * Appropriate handling, storage and disposal procedures.
 - * Prevention protocol of accidental contamination of soil at storage and handling areas.
 - * All storage areas, (i.e. for harmful substances appropriately bunded with a suitable collection point for accidental spills must be implemented and drip trays underneath dispensing mechanisms including leaking engines/machinery).
- » Fire prevention and management measures on site.
- » Fauna and flora protection process on and off site (i.e. removal to reintroduction or replanting, if necessary).
 - * Rehabilitation, re-vegetation process and bush clearing.
- » Incident and accident reporting protocol.
- » General administration.
- » Designate access road and the protocols while roads are in use.
- » Requirements on gate control protocols.

The Contractor may not commence the activity covered by the Method Statement until it has been approved by the Site Manager (with input from the ECO), except in the case of emergency activities and then only with the consent of the Site Manager. Approval of the Method Statement will not absolve the Contractor from their obligations or responsibilities in terms of their contract. Failure to submit a method statement may result in suspension of the activity concerned until such time as a method statement has been submitted and approved.

6.4 Awareness and Competence: Construction Phase

OBJECTIVE 17: To ensure all construction personnel have the appropriate level of environmental awareness and competence to ensure continued environmental due diligence and on-going minimisation of environmental harm

To achieve effective environmental management, it is important that all personnel involved in the project are aware of the responsibilities in terms of the relevant environmental legislation and the contents of this EMPr. The ECO is responsible for monitoring compliance pre, during and post construction. The contractor is responsible for informing employees and sub-contractors of their environmental obligations in terms of the environmental specifications, and for ensuring that employees are adequately experienced and properly trained in order to execute the works in a manner that will minimise environmental impacts.

The Contractors obligations in this regard include the following:

- » All Employees must have a basic understanding of the key environmental features of the construction site and the surrounding environment. This includes the discussion/explanation of site environmental matters during toolbox talks.
- » The content and requirements of Method Statements are to be clearly explained to all plant operators and general workers. All staff acting in a supervisory capacity are to have copies of the relevant Method Statements and be aware of the contents thereof.
- » Ensuring that a copy of the EMPr is readily available on-site, and that all senior site staff are aware of the location and have access to the document. Senior site staff will be familiar with the requirements of the EMPr and the environmental specifications as they apply to the construction of the facility.
- » Ensuring that, prior to commencing any site works, all employees and sub-contractors have attended an Environmental Awareness Training session. The training session must provide the site staff with an appreciation of the project's environmental requirements, and how they are to be implemented.
 - * Records must be kept of those that have completed the relevant training.
 - * Training should be done either in a written or verbal format but must be appropriate for the receiving audience.
 - * Refresher sessions must be held to ensure the contractor staff are aware of their environmental obligations as practically possible.
- » All sub-contractors must have a copy of the EMPr and sign a declaration/ acknowledgement that they are aware and familiar with the contents and requirements of the EMPr and that they will conduct work in such a manner as to ensure compliance with the requirements of the EMPr.
- » Contractors and main sub-contractors should have a basic training in the identification of archaeological sites/objects, and protected flora and fauna that may be encountered on the site.
- » Awareness of any other environmental matters, which are deemed to be necessary by the ECO.
- » Ensuring that employee information posters, outlining the environmental "do's" and "don'ts" (as per the environmental awareness training course) are erected at prominent locations throughout the site.

Therefore, prior to the commencement of construction activities on site and before any person commences with work on site thereafter, adequate environmental awareness and responsibility are to be appropriately presented to all staff present onsite, clearly describing their obligations towards environmental controls and methodologies in terms of this EMPr. This training and awareness will be achieved in the following ways:

6.4.1 Environmental Awareness and Induction Training

The EO, in consultation with the contractor, shall ensure that all construction workers receive an induction presentation, as well as on-going environmental education and awareness, on the importance and implications of the EMPr and the environmental requirements it prescribes. The presentation shall be conducted, as far as is possible, in the employees' language of choice. The contractor should provide a translator from their staff for the purpose of translating should this be necessary.

As a minimum, induction training should include:

- » Explanation of the importance of complying with the EMPr;
- » Explanation of the importance of complying with the Environmental Authorisation;
- » Discussion of the potential environmental impacts of construction activities;
- » Awareness regarding sensitivities on the site, including sensitive plant species (including the use of visual aids and on-site identification);
- » The benefits of improved personal performance;
- » Employees' roles and responsibilities, including emergency preparedness (this should be combined with this induction, but presented by the contractor's Health and Safety Representative);
- » Explanation of the mitigation measures that must be implemented when carrying out their activities; and
- » Explanation of the specifics of this EMPr and its specification (no-go areas, etc.).

Environmental Awareness Training must take the form of an on-site talk and demonstration by the EO/ECO before the commencement of site establishment and construction on site. The education/awareness programme should be aimed at all levels of management and construction workers within the contractor team. A record of attendance of this training must be maintained by the EO/ECO on site. Proof of awareness training should be kept on record. Environmental induction training must be presented to all persons who are to work on the site – be it for short or long durations; Contractor's or Engineer's staff; administrative or site staff; sub-contractors or visitors to site.

This induction training should be undertaken by the Contractor's Environmental Officer and should include discussing Kotulo Tsatsi Energy (Pty) Ltd's environmental policy and values, the function of the EMPr and Contract Specifications and the importance and reasons for compliance to these. The induction training must highlight overall do's and don'ts on site and clarify the repercussions of not complying with these. The non-conformance reporting system must be explained during the induction as well. Opportunity for questions and clarifications must form part of this training. A record of attendance of this training must be maintained by the EO/ECO on site.

6.4.2 Toolbox Talks

Toolbox talks should be held on a scheduled and regular basis (at least twice a month) where foremen, environmental and safety representatives of different components of the works and sub-consultants hold talks relating to environmental practices and safety awareness on site. These talks should also include discussions on possible common incidents occurring on site and ones recommended by the on site EO and the prevention of reoccurrence thereof. Records of attendance and the awareness talk subject must be kept on file.

6.5 Monitoring Programme: Construction Phase

OBJECTIVE 18: To monitor the performance of the control strategies employed against environmental objectives and standards

A monitoring programme must be in place not only to ensure conformance with the EMPr, but also to monitor any environmental issues and impacts which have not been accounted for in the EMPr that are, or could result in significant environmental impacts for which corrective action is required. The period and frequency of monitoring will be stipulated by the Environmental Authorisation (once issued). Where this is not clearly dictated, the Developer will determine and stipulate the period and frequency of monitoring required in consultation with relevant stakeholders and authorities. The Technical Director/ Project Manager will ensure that the monitoring is conducted and reported.

The aim of the monitoring and auditing process would be to monitor the implementation of the specified environmental specifications, in order to:

- » Monitor and audit compliance with the prescriptive and procedural terms of the environmental specifications
- » Ensure adequate and appropriate interventions to address non-compliance
- » Ensure adequate and appropriate interventions to address environmental degradation
- » Provide a mechanism for the lodging and resolution of public complaints
- » Ensure appropriate and adequate record keeping related to environmental compliance
- » Determine the effectiveness of the environmental specifications and recommend the requisite changes and updates based on audit outcomes, in order to enhance the efficacy of environmental management on site
- » Aid in communication and feedback to authorities and stakeholders

All documentation e.g. audit/monitoring/compliance reports and notifications, required to be submitted to the DFFE in terms of the Environmental Authorisation, must be submitted to the Director: Compliance Monitoring of the Department.

Records relating to monitoring and auditing must be kept on site and made available for inspection to any relevant and competent authority in respect of this development.

6.5.1. Non-Conformance Reports

All supervisory staff including Foremen, Engineers, and the ECO must be provided the means to be able to submit non-conformance reports to the Site Manager. Non-conformance reports will describe, in detail, the cause, nature and effects of any environmental non-conformance by the Contractor.

The non-conformance report will be updated on completion of the corrective measures indicated on the finding sheet. The report must indicate that the remediation measures have been implemented timeously and that the non-conformance can be closed-out to the satisfaction of the Site Manager and ECO.

6.5.2. Monitoring Reports

A monitoring report will be compiled by the ECO on a monthly basis and must be submitted to the Director: Compliance Monitoring at DFFE for their records. This report should include details of the activities undertaken in the reporting period, any non-conformances or incidents recorded, corrective action required, and details of those non-conformances or incidents which have been closed out. The contractor must ensure that all waste manifests are provided to the ECO on a monthly basis in order to inform and update the DFFE regarding waste related activities.

6.5.3. Audit Reports

The holder of the Environmental Authorisation must, for the period during which the Environmental Authorisation and EMPr remain valid, ensure that project compliance with the conditions of the Environmental Authorisation and the EMPr are audited, and that the audit reports are submitted to the Director: Compliance Monitoring of the DFFE.

An environmental internal audit must be conducted and submitted every 3 months and an external audit must be conducted once a year. An annual audit report must be compiled and submitted to DFFE until the completion of the construction and rehabilitation. This report must be compiled in accordance with Appendix 7 of the EIA Regulations, 2014, as amended, and indicate the date of the audit, the name of the auditor and the outcome of the audit in terms of compliance with the environmental authorisation conditions and the requirements of the EMPr.

6.5.4. Final Audit Report

A final environmental audit report must be compiled by an independent auditor and be submitted to DFFE upon completion of the construction and rehabilitation activities. The report must be submitted within 30 days of completion of rehabilitation activities. This report must indicate the date of the audit, the name of the auditor and the outcome of the audit in terms of compliance with the environmental authorisation conditions and the requirements of the EMPr.

CHAPTER 7: MANAGEMENT PROGRAMME: REHABILITATION

Overall Goal: Undertake the rehabilitation measures in a way that:

- » Ensures rehabilitation of disturbed areas following the execution of the works, such that residual environmental impacts are remediated or curtailed.

7.1. Objectives

In order to meet this goal, the following objective, actions and monitoring requirements are relevant:

OBJECTIVE 1: Ensure appropriate rehabilitation of disturbed areas such that residual environmental impacts are remediated or curtailed

Areas requiring rehabilitation will include all areas disturbed during the construction phase and that are not required for regular operation and maintenance operations. Rehabilitation should be undertaken in an area as soon as possible after the completion of construction activities within that area.

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|-------------------------------------|---|
| Project Component/s | <ul style="list-style-type: none"> » Construction camps. » Laydown areas. » Access roads. » Ancillary buildings. |
| Potential Impact | » Environmental integrity of the site undermined resulting in reduced visual aesthetics, erosion and increased runoff, and the requirement for on-going management intervention. |
| Activity/Risk Source | <ul style="list-style-type: none"> » Temporary construction areas. » Temporary access roads/tracks. » Other disturbed areas/footprints. |
| Mitigation: Target/Objective | <ul style="list-style-type: none"> » Ensure and encourage site rehabilitation of disturbed areas. » Ensure that the site is appropriately rehabilitated following the execution of the works, such that residual environmental impacts (including erosion) are remediated or curtailed. |

| Mitigation: Action/Control | Responsibility | Timeframe |
|--|-----------------------|--|
| Implement an appropriate Revegetation and Rehabilitation Plan. | Contractor | Following execution of the works |
| All temporary facilities, equipment, and waste materials must be removed from site as soon as construction is completed. | Contractor | Following execution of the works |
| All temporary fencing and danger tape must be removed once the construction phase has been completed. | Contractor | Following completion of construction activities in an area |
| Laydown areas and construction camps are to be checked for spills of substances such as oil, paint, etc. Any spills recorded must be cleaned up and the contaminated soil appropriately disposed of. | Contractor | Following completion of construction activities in an area |

| Mitigation: Action/Control | Responsibility | Timeframe |
|---|---|--|
| All voids must be backfilled. Any gullies or dongas must also be backfilled. | Contractor | Following completion of construction activities in an area |
| Where disturbed areas are not to be used during the operation of the PV facility, these areas must be rehabilitated/re-vegetated with appropriate natural indigenous vegetation and/or local seed mix. A seed mix must be applied to rehabilitated and bare areas. No exotic plants must be used for rehabilitation purposes. No grazing must be permitted to allow for the recovery of the area. | Contractor in consultation with rehabilitation specialist | Following completion of construction activities in an area |
| The area must be shaped to a natural topography. Trees (or vegetation stands) removed must be replaced. | Contractor | Following completion of construction activities in an area |
| No planting or importing any listed invasive alien plant species (all Category 1a, 1b and 2 invasive species) to the site for landscaping, rehabilitation or any other purpose must be undertaken. | Contractor | Following completion of construction activities in an area |
| Compacted areas must be ripped (perpendicularly) to a depth of 300mm, and the area shall be top soiled and re-vegetated. | Contractor | Following completion of construction activities in an area |
| Temporary roads must be closed and access across these blocked. The temporary access roads must be rehabilitated. | Contractor | Following completion of construction activities in an area |
| Necessary drainage works and anti-erosion measures must be installed, where required, to minimise loss of topsoil and control erosion. | Contractor | Following completion of construction activities in an area |
| Topsoil from all excavations and construction activities must be salvaged and reapplied during reclamation. Soils must be replaced in the correct sequence / profile. | Contractor | Following completion of construction activities in an area |
| Re-vegetated areas may need to be protected from wind erosion and maintained until an acceptable plant cover has been achieved. | Proponent in consultation with rehabilitation specialist | Post-rehabilitation |
| Erosion control measures should be used in sensitive areas such as steep slopes, hills, and drainage systems if necessary. | Proponent in consultation with EO and rehabilitation specialist (if required) | Post-rehabilitation |
| On-going alien plant monitoring and removal must be undertaken on all areas of natural vegetation on an annual basis. | Proponent | Post-rehabilitation |

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| Performance Indicator | <ul style="list-style-type: none"> » All portions of the site, including construction equipment camp and working areas, cleared of equipment and temporary facilities. » Topsoil replaced on all areas and stabilised where practicable or required after construction and temporally utilised areas. » Disturbed areas rehabilitated and acceptable plant cover achieved on rehabilitated sites. » Completed site free of erosion and alien invasive plants. |
| Monitoring | » Rehabilitated areas should be monitored (responsibility of EO) on a weekly basis |

throughout the construction phase and on a monthly basis thereafter and to the point where the area has rehabilitated to a satisfactory level.

- » On-going inspection of rehabilitated areas in order to determine effectiveness of rehabilitation measures implemented during the operational lifespan of the facility.
- » On-going alien plant monitoring and removal should be undertaken on an annual basis.

CHAPTER 8: OPERATION MANAGEMENT PROGRAMME

Overall Goal: To ensure that the operation of the PV3 does not have unforeseen impacts on the environment and to ensure that all impacts are monitored and the necessary corrective action taken in all cases. In order to address this goal, it is necessary to operate the facility in a way that:

- » Ensures that operation activities are properly managed in respect of environmental aspects and impacts.
- » Enables the operation activities to be undertaken without significant disruption to other land uses in the area, in particular with regard to farming practices, traffic and road use, and effects on local residents.

8.1. Objectives

In order to meet this goal, the following objectives have been identified, together with necessary actions and monitoring requirements.

OBJECTIVE 1: Establish clear reporting, communication, and responsibilities in relation to overall implementation of the EMPr during operation

Formal responsibilities are necessary to ensure that key procedures are executed. Specific responsibilities of the Operations Manager, and Environmental Manager for the operation phase of this project are detailed below.

The **Power Station Manager** will:

- » Ensure that adequate resources (human, financial, technology) are made available and appropriately managed for the successful implementation of the operational EMPr.
- » Conduct annual basis reviews of the EMPr to evaluate its effectiveness.
- » Take appropriate action as a result of findings and recommendations in management reviews and audits.
- » Provide forums to communicate matters regarding environmental management.

The **Technical/SHEQ Manager** will:

- » Develop and Implement an Environmental Management System (EMS) for the PV facility and associated infrastructure.
- » Manage and report on the facility's environmental performance.
- » Maintain a register of all known environmental impacts and manage the monitoring thereof.
- » Conduct internal environmental audits and co-ordinate external environmental audits.
- » Liaise with statutory bodies such as the National and Provincial Department of Forestry, Fisheries and the Environment (DFFE) on environmental performance and other issues.
- » Conduct environmental training and awareness for the employees who operate and maintain the facility.
- » Compile environmental policies and procedures.
- » Liaise with interested and affected parties on environmental issues of common concern.
- » Track and control the lodging of any complaints regarding environmental matters.

OBJECTIVE 2: Limit the ecological footprint of the PV Plant

Indirect impacts on vegetation and terrestrial fauna during operation could result from maintenance activities and the movement of people and vehicles on site. In order to ensure the long-term environmental integrity of the site following construction, maintenance of the areas rehabilitated post-construction must be undertaken until these areas have successfully re-established.

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| Project Component/s | <ul style="list-style-type: none"> » PV panels. » Access roads. » Rehabilitated areas. |
| Potential Impact | <ul style="list-style-type: none"> » Disturbance to or loss of vegetation and/or habitat in surrounding areas. » Environmental integrity of the site undermined resulting in reduced visual aesthetics, erosion, compromised land capability and the requirement for on-going management intervention. » Mortality and disturbance of avifauna within and beyond the footprint of the facility due to collisions with solar panels, presence of personnel and vehicle traffic |
| Activities/Risk Sources | <ul style="list-style-type: none"> » Avifaunal collisions with PV panels » Fauna entrapped along perimeter fencing » Human presence » Movement of vehicles to and from the site. » Presence of the PV infrastructure and site fencing. |
| Mitigation: Target/Objective | <ul style="list-style-type: none"> » Maintain minimised footprints of disturbance of vegetation/habitats on-site. » Ensure and encourage plant regrowth in non-operational areas of post-construction rehabilitation. |

| Mitigation: Action/Control | Responsibility | Timeframe |
|--|-----------------------|------------------|
| Rehabilitate disturbed areas should the previous attempt be unsuccessful. | Developer | Operation |
| Access to adjacent areas to be strictly controlled. | Developer | Operation |
| All vehicles accessing the site should adhere to a low speed limit (40km/h max) to avoid collisions with susceptible species such as snakes and tortoises, nocturnal and crepuscular species. | Developer | Operation |
| Maintain and augment natural vegetation around the proposed project | Developer | Operation |
| Vegetation control should be by manual clearing and herbicides should not be used except to control alien plants in the prescribed manner. | Developer | Operation |
| The use of herbicides and pesticides and other related horticultural chemicals should be carefully controlled and only applied by personnel adequately certified to apply pesticides and herbicides. It must be ensured that WHO Recommended Classification of Pesticides by Hazard Class 1a (extremely hazardous) or 1b (highly hazardous) are not purchased, stored or used on site along with any other nationally or internationally similarly restricted/banned products. | Developer | Operation |
| Develop and implement an systematic operation phase monitoring programme to record fauna and avifauna movement | Developer | Operation |

| Mitigation: Action/Control | Responsibility | Timeframe |
|--|-------------------------------|-----------|
| through the development footprint as well record fatalities. The monitoring programme must include carcass counts. | | |
| Monitor the movements of known birds at risk including Martial Eagles. | Developer | Operation |
| Soil surfaces where no revegetation seems possible will have to be covered with gravel or small rock fragments to increase porosity of the soil surface, slow down runoff and prevent wind and water erosion. | Developer | Operation |
| Any vegetation clearing that needs to take place as part of the maintenance activities must be done in an environmentally friendly manner, including avoiding the use of herbicides and using manual clearing methods wherever possible. | Developer | Operation |
| If the site must be lit at night for security purposes, this should be done with downward-directed low-UV type lights (such as most LEDs), which do not attract insects. | Developer | Operation |
| Maintenance of the perimeter fencing must ensure that it minimises impacts on species susceptible to entrapment. | Developer | Operation |
| Vehicle movements must be restricted to designated access roads. | Developer | Operation |
| Existing roads must be maintained to ensure limited erosion and impact on areas adjacent to roadways. | Developer | Operation |
| Maintain erosion control measures implemented during the construction phase (i.e. run-off attenuation on slopes (bags, logs), silt fences, storm water catch-pits, and shade nets). | Developer | Operation |
| Develop and implement an appropriate stormwater management plan for the operation phase of the facility. | Developer | Operation |
| Site access should be controlled and only authorised staff and contractors should be allowed on-site. | Developer | Operation |
| No harvesting of plants for firewood, medicinal or any other purposes are to be permitted | Developer | Operation |
| No killing and poaching of any wild animal to be allowed. This should be clearly communicated to all employees, including subcontractors. | Developer | Operation |
| Any potentially dangerous fauna such as snakes or fauna threatened by the maintenance and operational activities must be removed to a safe location. | Developer | Operation |
| <p>A 24 month monitoring avifaunal register must be implemented at the start of construction and maintained by the ECO and EO and contain the following:</p> <ul style="list-style-type: none"> » Record of all avifaunal injuries and fatalities; » Time, location and GPS co-ordinates of such incidence; » Common and species name of individual; » Possible cause of incident; » Conservation status; and » Photographic evidence. | EPC Contractor/ ECO Developer | Operation |
| The EPC contractor must ensure that all subcontractors report avifaunal incidents to the ECO/ EPC immediately | | |

| Mitigation: Action/Control | Responsibility | Timeframe |
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| An on-going alien plant monitoring and eradication programme must be implemented, where necessary. | Developer | Operation |
| Annual site inspection for erosion or water flow regulation problems – with follow up remedial action where problems are identified. | Developer | Operation |

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| Performance Indicator | <ul style="list-style-type: none"> » Limited soil erosion around site. » Limited disturbance to vegetation or avifauna and terrestrial faunal habitats. » Continued improvement of rehabilitation efforts. » Removal to safety of entrapped/injured fauna or avifauna encountered during routine maintenance. » Low impact on nocturnal and crepuscular species along roads |
| Monitoring | <ul style="list-style-type: none"> » Observation of vegetation on-site by environmental manager. » Regular inspections to monitor plant regrowth/performance of rehabilitation efforts and weed infestation compared to natural/undisturbed areas. |

OBJECTIVE 3: Minimise the establishment and spread of alien invasive plants

Major factors contributing to invasion by alien invader plants include high disturbance activities and negative grazing practices. Consequences of this may include:

- » Loss of indigenous vegetation;
- » Change in vegetation structure leading to change in various habitat characteristics;
- » Change in plant species composition;
- » Change in soil chemical properties;
- » Loss of sensitive habitats;
- » Loss or disturbance to individuals of rare, endangered, endemic, and/or protected species;
- » Fragmentation of sensitive habitats;
- » Change in flammability of vegetation, depending on alien species; and
- » Hydrological impacts due to increased transpiration and runoff.

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| Project Component/s | <ul style="list-style-type: none"> » PV facility. » Access road. » Associated infrastructure. |
| Potential Impact | <ul style="list-style-type: none"> » Invasion of natural vegetation surrounding the site by declared weeds or invasive alien species. » Impacts on soil. » Impact on faunal habitats. » Degradation and loss of agricultural potential. |
| Activities/Risk Sources | <ul style="list-style-type: none"> » Transport of construction materials to site. » Movement of construction machinery and personnel. » Site preparation and earthworks causing disturbance to indigenous vegetation. » Construction of site access roads. » Stockpiling of topsoil, subsoil and spoil material. » Routine maintenance work – especially vehicle movement. |
| Mitigation: | <ul style="list-style-type: none"> » To significantly reduce the presence of weeds and eradicate alien invasive species. |

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| Target/Objective | <ul style="list-style-type: none"> » To avoid the introduction of additional alien invasive plants to the site. » To avoid distribution and thickening of existing alien plants in the site. » To complement existing alien plant eradication programs in gradually causing a significant reduction of alien plant species throughout the site. |
|-------------------------|--|

| Mitigation: Action/Control | Responsibility | Timeframe |
|--|----------------|-----------|
| Develop and implement an IAP Control and Eradication Programme. | Developer | Operation |
| Avoid creating conditions in which alien plants may become established: <ul style="list-style-type: none"> » Keep disturbance of indigenous vegetation to a minimum. » Rehabilitate disturbed areas as quickly as possible. » Do not import soil from areas with alien plants. | Developer | Operation |
| Annual monitoring for alien plant species - with follow up clearing as needed – or as per the frequency stated in the alien invasive management plan to be developed for the site. When alien plants are detected, these must be controlled and cleared using the recommended control measures for each species to ensure that the problem is not exacerbated or does not re-occur. | Developer | Operation |
| Eradicate all weeds and alien invasive plants as far as practically possible and ensure that material from invasive plants are adequately destroyed and not further distributed. | Developer | Operation |
| Any alien and invasive vegetation removed should be taken to a registered landfill site to prevent the proliferation of alien and invasive species | Developer | Operation |
| The use of herbicides and pesticides and other related horticultural chemicals should be carefully controlled and only applied by personnel adequately certified to apply pesticides and herbicides. It must be ensured that WHO Recommended Classification of Pesticides by Hazard Class 1a (extremely hazardous) or 1b (highly hazardous) are not purchased, stored or used on site along with any other nationally or internationally similarly restricted/banned products. | Developer | Operation |

| | |
|------------------------------|---|
| Performance Indicator | » Low abundance of alien plants. For each alien species: number of plants and aerial cover of plants within the site and immediate surroundings. |
| Monitoring | <ul style="list-style-type: none"> » On-going monitoring of area by EO during construction. » Annual audit of development footprint and immediate surroundings by qualified botanist. » If any alien invasive species are detected then the distribution of these should be mapped (GPS co-ordinates of plants or concentrations of plants), number of individuals (whole site or per unit area), age and/or size classes of plants and aerial cover of plants. » The results should be interpreted in terms of the risk posed to sensitive habitats within and surrounding the site. » The environmental manager/site agent should be responsible for driving this process. » Reporting frequency depends on legal compliance framework. |

OBJECTIVE 4: Minimise dust and emissions to air

During the operation phase, limited gaseous or particulate emissions are anticipated from exhaust emissions (i.e. from operational vehicles). Windy conditions and the movement of vehicles on site may lead to dust creation.

| | |
|-------------------------------------|--|
| Project Component/s | <ul style="list-style-type: none"> » Gravel roads and surfaces. » On-site vehicle movement. |
| Potential Impact | <ul style="list-style-type: none"> » Dust and particulates from vehicle movement to and on-site. » Release of minor amounts of air pollutants (for example NO₂, CO and SO₂) from vehicles. |
| Activities/Risk Sources | <ul style="list-style-type: none"> » Re-entrainment of deposited dust by vehicle movements. » Wind erosion from unsealed roads and surfaces. » Fuel burning vehicle engines. |
| Mitigation: Target/Objective | <ul style="list-style-type: none"> » To ensure emissions from all vehicles are minimised, where possible. » To minimise nuisance to the community from dust emissions and to comply with workplace health and safety requirements. » To ensure emissions from the power generation process are minimised. |

| Mitigation: Action/Control | Responsibility | Timeframe |
|---|-----------------------|------------------|
| Implement appropriate dust suppression measures on a regular basis in any exposed surfaces. | Developer | Operation |
| Re-vegetation of cleared areas as soon as practically feasible. | Developer | Operation |
| Speed of vehicles must be restricted on site to 40km/hr. | Developer | Operation |
| Vehicles and equipment must be maintained in a road-worthy condition at all times. | Developer | Operation |

| | |
|------------------------------|--|
| Performance Indicator | <ul style="list-style-type: none"> » No complaints from affected residents or community regarding dust or vehicle emissions. » Dust suppression measures implemented where required. » Drivers made aware of the potential safety issues and enforcement of strict speed limits when they are employed. |
| Monitoring | <ul style="list-style-type: none"> » Immediate reporting by personnel of any potential or actual issues with nuisance or dust to the Power Station Manager. » A complaints register must be maintained, in which any complaints from residents/the community will be logged, and thereafter complaints will be investigated and, where appropriate, acted upon. » An incident reporting system must be used to record non-conformances to the EMPr. |

OBJECTIVE 5: Ensure the implementation of an appropriate fire management plan and general management measures during the operation phase

The following recommendations below must be considered with regards to fire protection on site:

- » Alien Invasive species should be completely eradicated in order to decrease the fire risk associated with the site.

- » Cigarette butts may not be thrown in the veld, but must be disposed of correctly. Designated smoking areas must be established with suitable receptacles for disposal.
- » In case of a fire outbreak, contact details of the local fire and emergency services must be readily available.
- » Contractors must ensure that basic firefighting equipment is available on site as per the specifications defined by the health and safety representative / consultant.
- » The fire risk on site is a point of discussion that must take place as part of the environmental induction training prior to commencement of construction.
- » The contractor must also comply with the requirements of the Occupational Health and Safety Act with regards to fire protection.

The following below can be used as a guide for appropriate fire management (also refer to **Appendix J**):

| | |
|-------------------------------------|--|
| Project Component/s | <ul style="list-style-type: none"> » PV Array and BESS. » Associated buildings |
| Potential Impact | » Veld fires can pose a personal safety risk to local farmers and communities, and their homes, crops, livestock and farm infrastructure, such as gates and fences. In addition, fire can pose a risk to the PV facility infrastructure. |
| Activities/Risk Sources | » The presence of operation and maintenance personnel and their activities on the site can increase the risk of veld fires. |
| Mitigation: Target/Objective | » To avoid and or minimise the potential risk of veld fires on local communities and their livelihoods. |

| Mitigation: Action/Control | Responsibility | Timeframe |
|--|-----------------------|------------------|
| Provide adequate firefighting equipment on site and establish a fire-fighting management plan during operation. | O&M Contractor | Operation |
| Provide fire-fighting training to selected operation and maintenance staff. | O&M Contractor | Operation |
| Ensure that appropriate communication channels are established to be implemented in the event of a fire. | O&M Contractor | Operation |
| Fire breaks should be established where and when required. Cognisance must be taken of the relevant legislation when planning and burning firebreaks (in terms of timing, etc.). | Contractor | Operation |
| Upon completion of the construction phase, an emergency evacuation plan must be drawn up to ensure the safety of the staff and surrounding land users in the case of an emergency. | O&M Contractor | Operation |
| Contact details of emergency services should be prominently displayed on site. | O&M Contractor | Operation |
| Road borders must be regularly maintained to ensure that vegetation remains short and that they therefore serve as an effective firebreak. | O&M Contractor | Operation |
| Should panels be required to be replaced, the following will apply: <ul style="list-style-type: none"> » Materials and panels are to be stored within the previously disturbed construction laydown area. No disturbance of areas outside of these areas should occur. » Full clean-up of all materials must be undertaken after the removal and replacement of the solar panel arrays and | O&M Contractor | Operation |

| Mitigation: Action/Control | Responsibility | Timeframe |
|--|----------------|-----------|
| <p>associated infrastructure is complete, and disturbed areas appropriately rehabilitated.</p> <ul style="list-style-type: none"> » Most of the materials used for solar panel systems can be recycled. The majority of the glass and semiconductor materials can be recovered and re-used or recycled. Recyclable materials must be transported off-site by truck and managed at appropriate facilities in accordance with relevant waste management regulations. No waste materials may be left on-site. » Waste material which cannot be recycled shall be disposed of at an appropriately licensed waste disposal site or as required by the relevant legislation. | | |

| | |
|------------------------------|---|
| Performance Indicator | <ul style="list-style-type: none"> » Firefighting equipment and training provided before the operation phase commences. » Appropriate fire breaks in place. |
| Monitoring | <ul style="list-style-type: none"> » The O&M operator must monitor indicators listed above to ensure that they have been met. |

OBJECTIVE 6: Maximise local employment, skills development and business opportunities associated with the construction phase

| | |
|--------------------------------------|---|
| Project Component/s | <ul style="list-style-type: none"> » Operation and maintenance activities associated with the facility. » Availability of required skills in the local communities for the undertaking of the construction activities. |
| Potential Impact | <ul style="list-style-type: none"> » The opportunities and benefits associated with the creation of local employment and business should be maximised. |
| Activities/Risk Sources | <ul style="list-style-type: none"> » Limited use of local labour, thereby reducing the employment and business opportunities for locals. » Sourcing of individuals with skills similar to the local labour pool outside the municipal area. » Unavailability of locals with the required skills resulting in locals not being employed and labour being sourced from outside the municipal area. » Higher skilled positions might be sourced internationally, where required. |
| Enhancement: Target/Objective | <ul style="list-style-type: none"> » The Developer should aim to employ as many low-skilled and semi-skilled workers from the local area as possible. This should also be made a requirement for all contractors. » Employment of a maximum number of the low-skilled and/or semi-skilled workers from the local area where possible. » Appropriate skills training and capacity building. |

| Mitigation: Action/Control | Responsibility | Timeframe |
|--|----------------|-----------|
| Where feasible, effort must be made to employ locally in order to create maximum benefit for the communities. | Developer | Operation |
| In order to maximise the positive impact, it is suggested that the Developer provide training courses for employees where feasible to ensure that employees gain as much as possible from the work experience. | Developer | Operation |
| Facilitate the transfer of knowledge between experienced employees and the staff. | Developer | Operation |

| Mitigation: Action/Control | Responsibility | Timeframe |
|--|----------------|-----------|
| Perform a skills audit to determine the potential skills that could be sourced in the area. | Developer | Operation |
| Effort should be made to use locally sourced inputs where feasible in order to maximize the benefit to the local economy. Local Small and Medium Enterprises are to be approached to investigate the opportunities for supplying inputs required for the construction of the facility, as far as feasible. | Developer | Operation |
| Local Small and Medium Enterprises are to be approached to investigate the opportunities for supplying inputs required for the maintenance and operation of the facility, as far as feasible | Developer | Operation |

| | |
|------------------------------|--|
| Performance Indicator | <ul style="list-style-type: none"> » Job opportunities, especially of low to semi-skilled positions, are primarily awarded to members of local communities as appropriate. » Locals and previously disadvantaged individuals (including women) are considered during the hiring process. » Labour, entrepreneurs, businesses, and SMMEs from the local sector are awarded jobs, where possible, based on requirements in the tender documentation. » The involvement of local labour is promoted. » Reports are not made from members of the local communities regarding unrealistic employment opportunities or that only outsiders were employed. » Employment and business policy document that sets out local employment and targets is completed before the construction phase commences. » Skills training and capacity building initiatives are developed and implemented. |
| Monitoring | <ul style="list-style-type: none"> » Developer must keep a record of local recruitments and information on local labour to be shared with the ECO for reporting purposes. |

OBJECTIVE 7: Minimise impacts related to traffic management

| | |
|-------------------------------------|--|
| Project Component/s | <ul style="list-style-type: none"> » Operation and maintenance vehicles. |
| Potential Impact | <ul style="list-style-type: none"> » Impact of vehicles on road surfaces, and possible increased risk in accidents involving people and animals. » Deterioration of road pavement conditions (both surfaced and gravel road) due to abnormal loads. |
| Activities/Risk Sources | <ul style="list-style-type: none"> » Operation and maintenance vehicle movement. » Speeding on local roads. » Degradation of local road conditions. |
| Mitigation: Target/Objective | <ul style="list-style-type: none"> » Minimise impact of traffic associated with the operation and maintenance of the facility on local traffic volumes, existing infrastructure, property owners, animals, and road users. » To minimise potential for negative interaction between pedestrians or sensitive users and traffic associated with the facility construction. » To ensure all vehicles are roadworthy and all materials/equipment are transported appropriately and within any imposed permit/licence conditions. |

| Mitigation: Action/Control | Responsibility | Timeframe |
|--|----------------|-----------|
| Ensure that, at all times, people have access to their properties as | Developer | Operation |

| Mitigation: Action/Control | Responsibility | Timeframe |
|--|----------------|-----------|
| well as to social facilities. | | |
| Vehicles used for operation and maintenance purposes should be inspected regularly to ensure their road-worthiness. | Developer | Operation |
| Strict vehicle safety standards should be implemented and monitored. | Developer | Operation |
| Appropriate road management strategies must be implemented on external and internal roads with all employees and contractors required to abide by standard road and safety procedures. | Developer | Operation |
| Road signage and road markings in the vicinity of the site should be well maintained to enhance road safety. | Developer | Operation |
| Provide clearly defined roadway, parking and pedestrian walkway areas within the site with adequate lighting | Developer | Operation |
| Road signage and road markings in the vicinity of the site should be well maintained to enhance road safety. | Developer | Operation |
| Provide clearly defined roadway, parking and pedestrian walkway areas with adequate lighting. | Developer | Operation |
| Staff and general trips to the site should occur outside of peak traffic periods. | O&M Contractor | Operation |

| | |
|------------------------------|--|
| Performance Indicator | <ul style="list-style-type: none"> » Vehicles keeping to the speed limits. » Vehicles are in good working order and safety standards are implemented. » Local residents and road users are aware of vehicle movements and schedules. » Local road conditions and road surfaces are up to standard. » Complaints of residents are not received (e.g. concerning the speeding of heavy vehicles). |
| Monitoring | <ul style="list-style-type: none"> » Environmental manager must monitor indicators listed above to ensure that they have been implemented. |

OBJECTIVE 8: Appropriate handling and management of hazardous substances, waste and dangerous goods

The operation of the PV facility will involve the storage of chemicals and hazardous substances, as well as the generation of limited waste products. The main wastes expected to be generated by the operation activities includes general solid waste, hazardous waste and sewage waste.

| | |
|-------------------------------------|--|
| Project Component/s | <ul style="list-style-type: none"> » PV facility. » Associated infrastructure. |
| Potential Impact | <ul style="list-style-type: none"> » Inefficient use of resources resulting in excessive waste generation. » Litter or contamination of the site or water through poor waste management practices. » Contamination of water or soil because of poor materials management. |
| Activity/Risk Source | <ul style="list-style-type: none"> » Transformers, switchgear and supporting equipment. » Workshop / control room. |
| Mitigation: Target/Objective | <ul style="list-style-type: none"> » Comply with waste management legislation. » Minimise production of waste. » Ensure appropriate waste disposal. |

- » Avoid environmental harm from waste disposal.
- » Ensure appropriate storage of chemicals and hazardous substances.

| Mitigation: Action/Control | Responsibility | Timeframe |
|---|----------------|---------------------------|
| Hazardous substances (such as used/new transformer oils, etc.) must be stored in sealed containers within a clearly demarcated designated area. | Developer | Operation |
| Spill kits must be made available on-site for the clean-up of spills and leaks of contaminants. | Developer | Operation and maintenance |
| Storage areas for hazardous substances must be appropriately sealed and bunded. | Developer | Operation |
| Under no circumstances shall rubble, earth or other material be dumped within the servitude restriction area. The developer shall maintain the area concerned to Eskom's satisfaction. The developer shall be liable to Eskom for the cost of any remedial action which has to be carried out by Eskom. | Developer | Operation |
| All hazardous materials should be stored in the appropriate manner to prevent contamination of the site. Any accidental chemical, fuel and oil spills that occur at the site should be cleaned up in the appropriate manner as related to the nature of the spill. | Developer | Operation |
| All structures and/or components replaced during maintenance activities must be appropriately disposed of at an appropriately licensed waste disposal site or sold to a recycling merchant for recycling. | Developer | Operation |
| Care must be taken to ensure that spillage of oils and other hazardous substances are limited during maintenance. Handling of these materials should take place within an appropriately sealed and bunded area. Should any accidental spillage take place, it must be cleaned up according to specified standards regarding bioremediation. | Developer | Operation and maintenance |
| All food waste and litter at the site should be placed in bins with lids and removed from the site on a regular basis. | Developer | Operation |
| Waste handling, collection, and disposal operations must be managed and controlled by a waste management contractor. | Developer | Operation |
| All sewage disposal to take place at a registered and operational wastewater treatment works. Proof of disposal to be retained as proof of responsible disposal. | Developer | Operation |
| Used oils and chemicals: » Appropriate disposal must be arranged with a licensed facility in consultation with the administering authority. » Waste must be stored and handled according to the relevant legislation and regulations. | Developer | Operation |
| General waste must be recycled where possible or disposed of at an appropriately licensed landfill. | Developer | Operation |
| Hazardous waste (including hydrocarbons) and general waste must be stored and disposed of separately. | Developer | Operation |
| All servicing and re-fuelling of machines and equipment must either take place off-site, or in controlled and bunded working areas. | Developer | Operation |

| Mitigation: Action/Control | Responsibility | Timeframe |
|---|----------------|-----------|
| Separation and recycling of different waste materials should be supported. | Developer | Operation |
| Should a chemical spill take place, an aquatic ecologist must be contracted to identify the extent of the impact and assist with additional mitigation measures. | Developer | Operation |
| Immediately report significant spillages and initiate an environmental site assessment for risk assessment and remediation if necessary. | Developer | Operation |
| Regular quality monitoring of waste before discharge. | Developer | Operation |
| The dirty water dam will need to be lined to prevent any seepage of waste water. | Developer | Operation |
| Emergency response arrangements and systems such as foam pourers, fire-fighting systems and cooperation with emergency responders. Preventive measures could include maintenance procedures to prevent the occurrence of a catastrophic loss of containment, as well as strict control of ignition sources and other measures which may be required according to standards such as those prescribed by the South African National Standards system. | Developer | Operation |

| | |
|------------------------------|--|
| Performance Indicator | <ul style="list-style-type: none"> » No complaints received regarding waste on site or indiscriminate dumping. » Internal site audits identifying that waste segregation recycling and reuse is occurring appropriately. » Provision of all appropriate waste manifests. » No contamination of soil or water. |
| Monitoring | <ul style="list-style-type: none"> » Waste collection must be monitored on a regular basis. » Waste documentation must be completed and available for inspection. » An incidents/complaints register must be maintained, in which any complaints from the community must be logged. » Complaints must be investigated and, if appropriate, acted upon. » Regular reports on exact quantities of all waste streams exiting the site must be compiled by the waste management contractor and monitored by the O&M operator. » All appropriate waste disposal certificates accompany the monthly reports. |

OBJECTIVE 9: Appropriate operation and maintenance of Battery Energy Storage System

| | |
|-------------------------------------|--|
| Project Component/s | » Integrated Energy Storage System |
| Potential Impact | <ul style="list-style-type: none"> » Fire and safety risks » Leakages and impacts on soils and water resources |
| Activities/Risk Sources | » Inappropriate operation and maintenance of BESS |
| Mitigation: Target/Objective | » To avoid and or minimise the potential risk of associated with the operation and maintenance of the BESS. |

| Mitigation: Action/Control | Responsibility | Timeframe |
|--|-----------------|-----------|
| Compile a procedure for the safe handling of battery cells | O&M Contractor/ | Operation |

| Mitigation: Action/Control | Responsibility | Timeframe |
|---|----------------------------------|-----------|
| | Project Company | |
| Ensure that battery supplier user guides, safety specifications and MSDS are filed on site at all times. | O&M Contractor / Project Company | Operation |
| Operate, maintain and monitor the BESS as per supplier specifications. | O&M Contractor / Project Company | Operation |
| Compile method statements for approval by the Technical/SHEQ Manager for battery cell, electrolyte and battery cell/ container replacement. Maintain method statements on site. | O&M Contractor / Project Company | Operation |
| Ensure that all maintenance contractors/ staff are familiar with the supplier's specifications. | O&M Contractor / Project Company | Operation |
| Provide signage on site specifying the types of batteries in use and the risk of exposure to hazardous material and electric shock. | O&M Contractor / Project Company | Operation |
| Provide signage on site specifying how electrical and chemical fires should be dealt with by first responders, and the potential risks to first responders (e.g. toxic fumes). | O&M Contractor / Project Company | Operation |
| Maintain suitable firefighting equipment on site. | O&M Contractor / Project Company | Operation |
| Maintain strict access control to the battery storage area. | O&M Contractor / Project Company | Operation |
| Undertake regular visual checks on BESS equipment to identify signs of damage or leaks. | O&M Contractor / Project Company | Operation |
| Provide environmental awareness training to all personnel on site. Training should include discussion of: <ul style="list-style-type: none"> • Potential impact of electrolyte spills on groundwater; • Suitable disposal of waste and effluent; • Key measures in the EMPr relevant to worker's activities; • How incidents and suggestions for improvement can be reported. Ensure that all attendees remain for the duration of the training and on completion sign an attendance register that clearly indicates participants' names. | O&M Contractor / Project Company | Operation |

| | |
|------------------------------|---|
| Performance Indicator | <ul style="list-style-type: none"> » BESS operated and maintained in accordance with supplier specifications. » Appropriate signage on site. » Employees appropriately trained. » Required documentation available on site. » Firefighting equipment and training provided before the operation phase commences. |
| Monitoring | <ul style="list-style-type: none"> » The O&M contractor/ Project Company must monitor indicators listed above to ensure that they have been met. |

CHAPTER 9: MANAGEMENT PROGRAMME: DECOMMISSIONING

The lifespan of the proposed P3 will be more than 25 years. Equipment associated with this facility would only be decommissioned once it has reached the end of its economic life or if it is no longer required. The lifespan of the PV3 could be extended depending on the condition of the infrastructure. An assessment will be undertaken prior to the end of the lifecycle of the plant to determine whether the plant should be decommissioned or whether the operation of the plant should continue.

It is most likely that decommissioning activities of the infrastructure of the facility discussed in the EIA process would comprise the disassembly, removal and disposal of the infrastructure. Decommissioning activities will involve disassembly of the production units and ancillary infrastructure, demolishing of buildings, removal of waste from the site and rehabilitation to the desired end-use. Future use of the site after decommissioning of the PV3 could possibly form part of an alternative industry that would be able to utilise some of the existing infrastructure associated with the facility. This would however be dependent on the development plans of the area at the time.

As part of the decommissioning phase the developer will undertake the required permitting processes applicable at the time of decommissioning.

The relevant mitigation measures contained under the construction section should be applied during decommissioning and therefore are not repeated in this section.

9.1. Objectives

Within a period of at least 12 months prior to the decommissioning of the site, a Decommissioning Method Statement must be prepared and submitted to the Local Planning Authority, as well as the Provincial and National Environmental Authority. This method statement must cover site restoration, soil replacement, landscaping, conservation, and a timeframe for implementation. Furthermore, this decommissioning must comply with all relevant legal requirements administered by any relevant and competent authority at that time.

The objectives of the decommissioning phase of the proposed project are to:

- » Follow a process of decommissioning that is progressive and integrated into the short- and long-term project plans that will assess the closure impacts proactively at regular intervals throughout project life.
- » Implement progressive rehabilitation measures, beginning during the construction phase.
- » Leave a safe and stable environment for both humans and animals and make their condition sustainable.
- » Return rehabilitated land-use to a standard that can be useful to the post-project land user.
- » Where applicable, prevent any further soil and surface water contamination by maintaining suitable storm water management systems.
- » Maintain and monitor all rehabilitated areas following re-vegetation, and if monitoring shows that the objectives have been met, apply for closure.

9.2. Approach to the Decommissioning Phase

It is recommended that planning of the decommissioning of the project and rehabilitation of the site should take place well in advance (at least two years) of the planned decommissioning activities. Important factors that need to be taken into consideration are detailed below.

Two possible scenarios for this decommissioning phase are detailed below:

SCENARIO 1: TOTAL DECOMMISSIONING OF PV FACILITY

If the decision is taken at the end of the project lifespan to totally decommission the facility, i.e. make the land available for an alternative land use, the following should take place:

- » All concrete and imported foreign material must be removed from the PV facility i.e. panels, support structures etc.
- » The holes where the panel support structures are removed must be levelled and covered with subsoil and topsoil.
- » Infrastructure not required for the post-decommissioning use of the site must be removed and appropriately disposed of.
- » Access roads and servitudes not required for the post-decommissioning use of the site must be rehabilitated. If necessary, an ecologist should be consulted to give input into rehabilitation specifications.
- » Tracks that are to be utilised for the future land use operations should be left *in-situ*. The remainder of the tracks to be removed (ripped) and topsoil replaced.
- » All ancillary buildings and access points are to be removed unless they can be used for the future land use.
- » Underground electric cables are to be removed if they cannot be used in the future land use.
- » All material (cables, PV Panels etc.) must be re-used or recycled wherever possible.
- » The competent authority may grant approval to the owner not to remove the landscaping and underground foundations.
- » The site must be seeded with locally sourced indigenous vegetation (unless otherwise dictated by the future land use) to allow revegetation of the site.
- » Monitor rehabilitated areas quarterly for at least three years (expected) following decommissioning, and implement remedial action as and when required.

SCENARIO 2: PARTIAL DECOMMISSIONING OF ENERGY FACILITY

Should more advanced technology become available it may be decided to continue to use the site as a PV facility. Much of the existing infrastructure is likely to be re-used in the upgraded facility. In this case, all infrastructure that will no longer be required for the upgraded facility must be removed as described for Scenario 1. The remainder of the infrastructure should remain in place or upgraded depending on the requirements of the new facility. Any upgrades to the facility at this stage must comply with relevant legislation.

9.2.1. Identification of structures for post-closure use

Access roads should be assessed in conjunction with the future land users to determine if these could be used. Where not required, these access roads should be decommissioned and rehabilitated.

9.2.2. Removal of infrastructure

All infrastructure must be dismantled and removed. Inert material must be removed from site and disposed of at a suitably registered landfill site. The PV facility components must be removed and recycled where possible or disposed of at a suitably registered landfill site. All foundations must be removed to a depth of 1m. Hard surfaces must be ripped to a depth of 1m and vegetated.

9.2.3. Soil rehabilitation

The steps that should be taken during the rehabilitation of soils are as follows:

- » The deposited soils must be ripped to ensure reduced compaction;
- » An acceptable seed bed should be produced by surface tillage;
- » Restore soil fertility;
- » Incorporate the immobile fertilisers in to the plant rooting zone before ripping; and
- » Apply maintenance dressing of fertilisers on an annual basis until the soil fertility cycle has been restored.

9.2.4. Establishment of vegetation

The objective is to restore the project site to a self-sustaining cycle, i.e. to realise the re-establishment of the natural nutrient cycle with ecological succession initiated.

The objectives for the re-vegetation of reshaped and top-soiled land are to:

- » Prevent erosion;
- » Restore the land to the agreed land capability;
- » Re-establish eco-system processes to ensure that a sustainable land use can be established without requiring fertilizer additions; and
- » Restore the biodiversity of the area as far as possible.

9.2.5. Maintenance

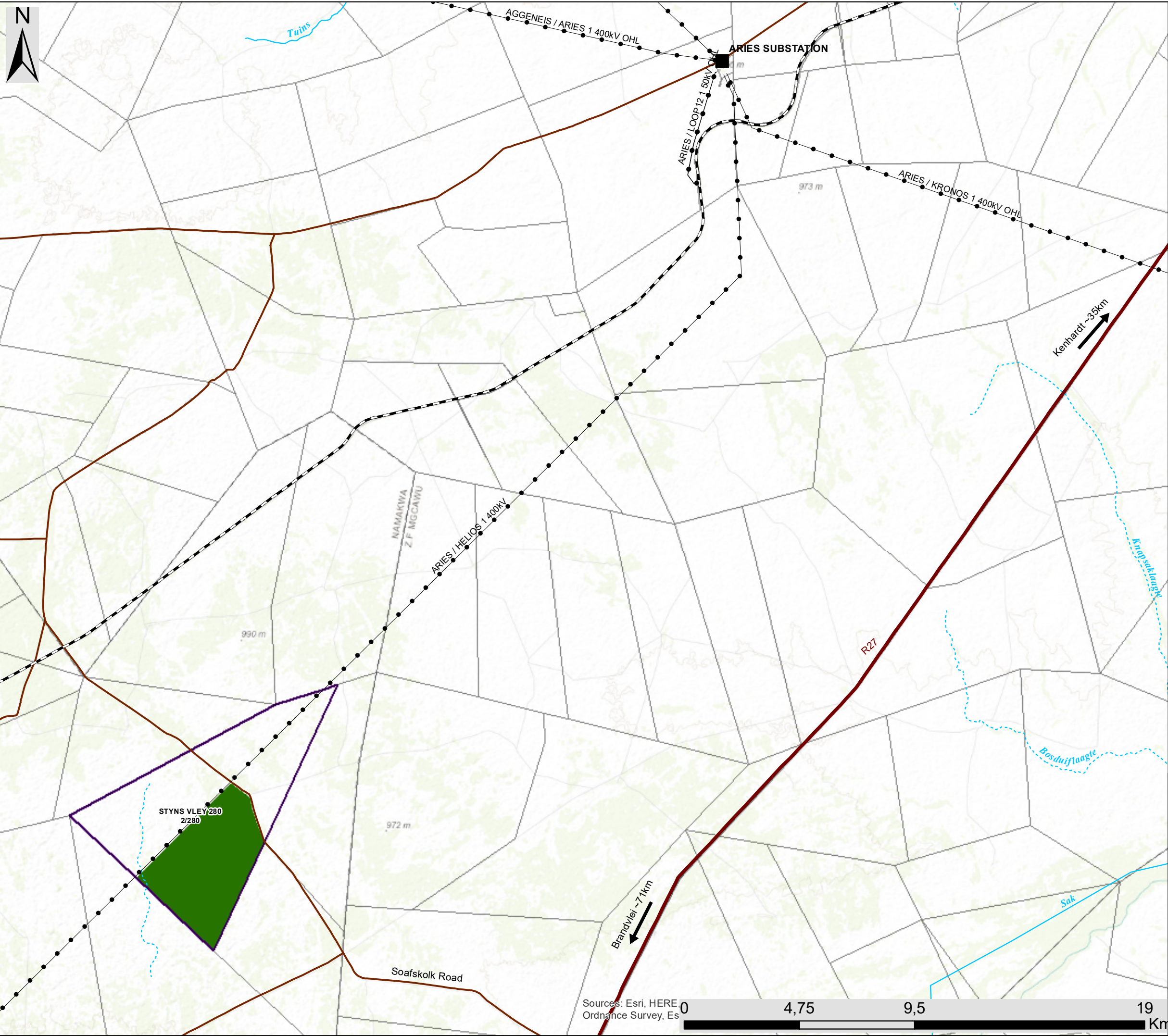
Established vegetation requires regular maintenance. If the growth medium consists of low-fertility soils, then regular maintenance will be required until the natural fertility cycle has been restored.

9.2.6. Monitoring

The purpose of monitoring is to ensure that the objectives of rehabilitation are met and that the rehabilitation process is followed. The physical aspects of rehabilitation should be carefully monitored during the progress of establishment of desired final ecosystems.

The following items should be monitored continuously:

- » Erosion status;
- » Vegetation species diversity; and
- » Faunal re-colonisation.



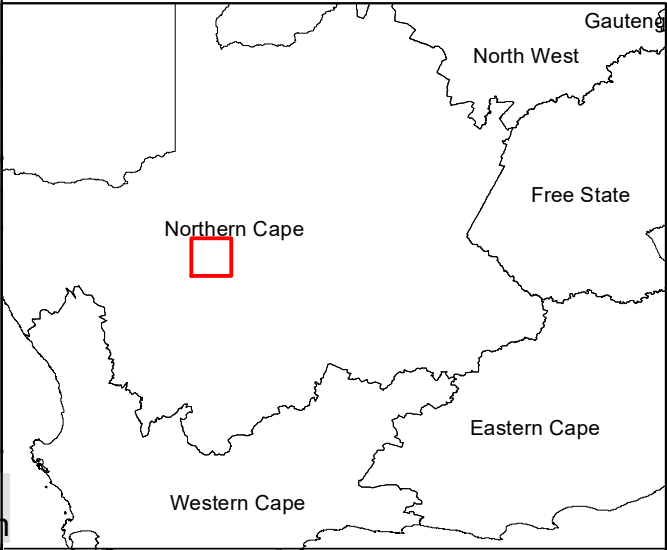
Kotulo Tsatsi Energy PV3, Northern Cape

Locality Map

Legend

- Eskom substation
- Existing Power Line
- Railway
- Regional road
- Main road
- Perennial river
- Non-perennial river
- Farm portions
- Project Site
- Development Area

Scale: 1: 155 000
 Projection: WGS_1984
 Map Ref: Kotulo Tsatsi Energy PV3 - Locality



Sources: Esri, HERE, Ordnance Survey, Esri

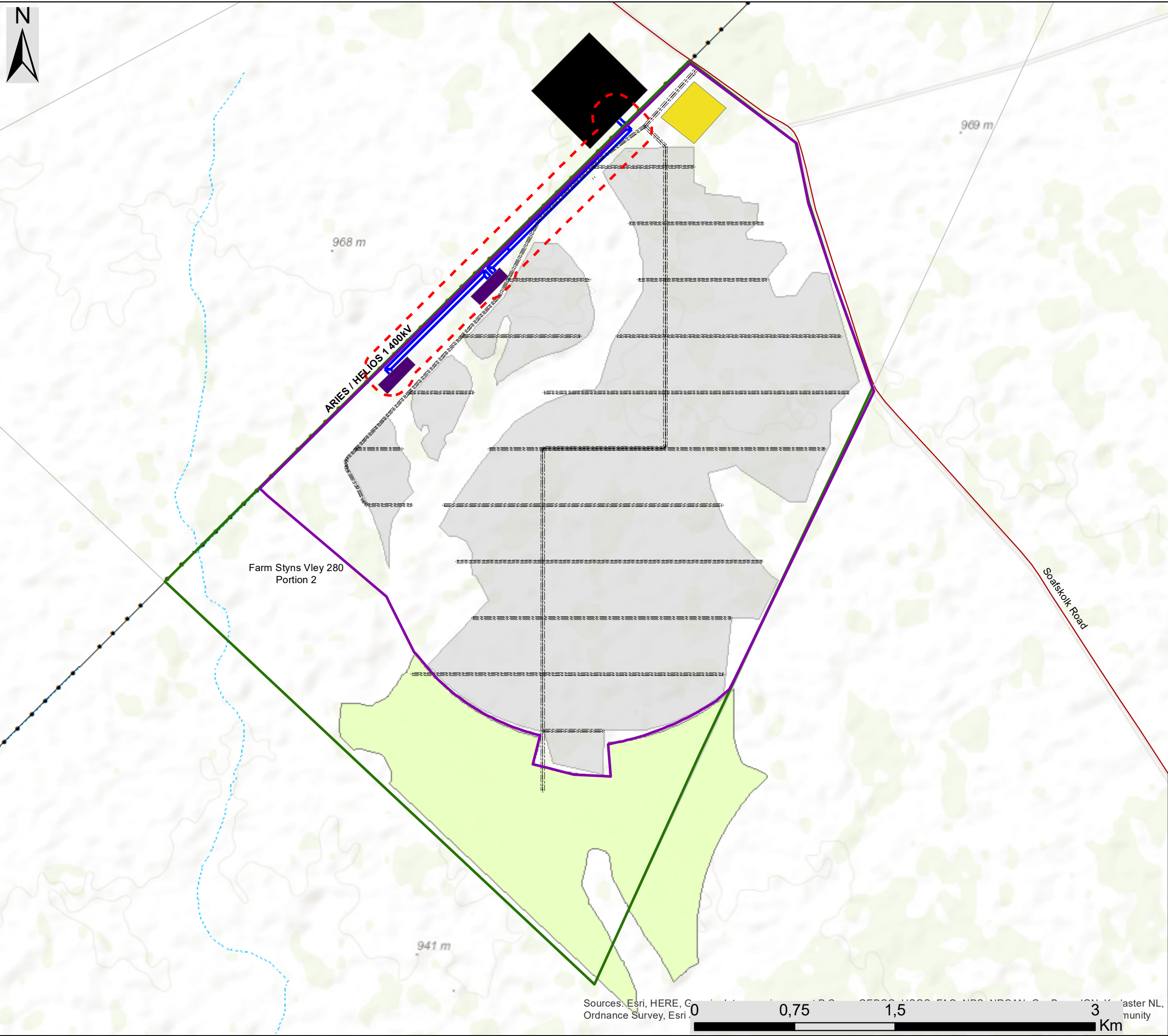


Kotulo Tsatsi Energy PV3, Northern Cape

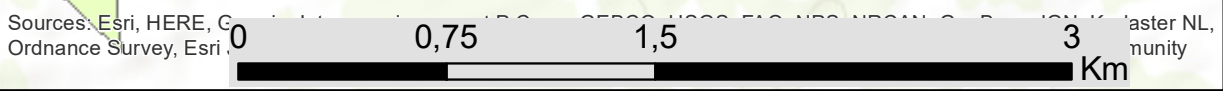
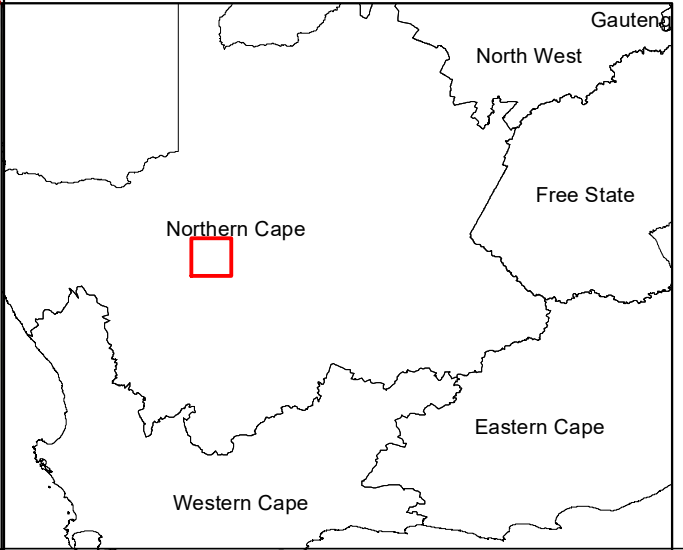
Optimised Layout Map

Legend

- - - - Non-perennial river
 - Existing Power Line
 - Roads
 - Farm Portion
 - 400 kV substation (authorised)
 - Kotulo Tsatsi Energy PV 2 (Authorised)
 - Development Footprint
 - Development Area
- ### Facility Layout
- Optimised PV3 Array
 - Substation and BESS Hubs
 - Grid Connection Corridor (300m assessed area)
 - 132 kV Power Lines
 - Internal and Access Roads
 - O&M and Laydown Area Hub



Scale: 1: 28 000
 Projection: WGS_1984
 Map Ref: Kotulo Tsatsi Energy PV3



GRIEVANCE MECHANISM / PROCESS

PURPOSE

This Grievance Mechanism has been developed to receive and facilitate the resolution of concerns and grievances regarding the project's environmental and social performance. The aim of the Grievance Mechanism is to ensure that grievances or concerns raised by stakeholders are addressed in a manner that:

- » Provides a predictable, accessible, transparent, and credible process to all parties, resulting in outcomes that are fair and equitable, accountable and efficient.
- » Promotes trust as an integral component of broader community relations activities.
- » Enables more systematic identification of emerging issues and trends, facilitating corrective action and pre-emptive engagement.

The aim of this Grievance Mechanism is to provide a process to address grievances in a manner that does not require a potentially costly and time-consuming legal process.

PROCEDURE FOR RECEIVING AND RESOLVING GRIEVANCES

The following proposed grievance procedures are to be complied with throughout the construction, operation and decommissioning phases of the project. These procedures should be updated as and when required to ensure that the Grievance Mechanism is relevant for the project and effective in providing the required processes.

- » Local landowners, communities and authorities must be informed in writing by the Developer of the grievance mechanism and the process by which grievances can be brought to the attention of the Developer through its designated representative. This must be undertaken with the commencement of the construction phase.
- » A company representative must be appointed as the contact person to which grievances can be directed. The name and contact details of the contact person must be provided to local landowners, communities and authorities when requested.
- » Project related grievances relating to the construction, operation and or decommissioning phases must be addressed in writing to the contact person. The contact person should assist local landowners and/or communities who may lack resources to submit/prepare written grievances, by recording grievances and completing written grievance notices where applicable, translating requests or concerns or by facilitating contact with relevant parties who can address the raised concerns. The following information should be obtained, as far as possible, regarding each written grievance, which may act as both acknowledgement of receipt as well as record of grievance received:
 - a. The name and contact details of the complainant;
 - b. The nature of the grievance;
 - c. Date raised, received, and for which the meeting was arranged;
 - d. Persons elected to attend the meeting (which will depend on the grievance); and
 - e. A clear statement that the grievance procedure is, in itself, not a legal process. Should such avenues be desired, they must be conducted in a separate process and do not form part of this grievance mechanism.

- » The grievance must be registered with the contact person who, within 2 working days of receipt of the grievance, must contact the Complainant to discuss the grievance and, if required, agree on suitable date and venue for a meeting in order to discuss the grievances raised. Unless otherwise agreed, the meeting should be held within 2 weeks of receipt of the grievance.
- » The contact person must draft a letter to be sent to the Complainant acknowledging receipt of the grievance, the name and contact details of Complainant, the nature of the grievance, the date that the grievance was raised, and the date and venue for the meeting (once agreed and only if required).
- » A grievance register must be kept on site (in electronic format, so as to facilitate editing and updating), and shall be made available to all parties wishing to gain access thereto.
- » Prior to the meeting being held the contact person must contact the Complainant to discuss and agree on the parties who should attend the meeting, as well as a suitable venue. The people who will be required to attend the meeting will depend on the nature of the grievance. While the Complainant and or Developer are entitled to invite their legal representatives to attend the meeting/s, it should be made clear to all the parties involved in the process that the grievance mechanism process is not a legal process, and that if the Complainant invites legal representatives, the cost will be their responsibility. It is therefore recommended that the involvement of legal representatives be limited as far as possible, as a matter of last resort, and that this process be primarily aimed at stakeholder relationship management as opposed to an arbitration or litigation mechanism.
- » The meeting should be chaired by the Developer's representative appointed to address grievances. The Developer must supply and nominate a representative to capture minutes and record the meeting/s.
- » Draft copies of the minutes must be made available to the Complainant and the Developer within 5 working days of the meeting being held. Unless otherwise agreed, comments on the Draft Minutes must be forwarded to the company representative appointed to manage the grievance mechanism within 5 working days of receipt of the draft minutes.
- » The meeting agenda must be primarily the discussion of the grievance, avoidance and mitigation measures available and proposed by all parties, as well as a clear indication of the future actions and responsibilities, in order to put into effect the proposed measures and interventions to successfully resolve the grievance.
- » In the event of the grievance being resolved to the satisfaction of all the parties concerned, the outcome must be recorded and signed off by the relevant parties. The record should provide details of the date of the meeting/s, the names of the people that attended the meeting/s, the outcome of the meeting/s, and where relevant, the measures identified to address the grievance, the party responsible for implementing the required measures, and the agreed upon timeframes for the measures to be implemented.
- » In the event of a dispute between the Complainant and the Developer regarding the grievance, the option of appointing an independent mediator to assist with resolving the issue should be discussed. The record of the meeting/s must note that a dispute has arisen and that the grievance has not been resolved to the satisfaction of all the parties concerned.
- » In the event that the parties agree to appoint a mediator, the Developer will be required to identify three (3) mediators and forward the names and CVs to the Complainant within 2 weeks of the dispute being declared. The Complainant, in consultation with the Developer, must identify the preferred mediator and agree on a date for the next meeting. The cost of the mediator must be borne by the Developer. The Developer must supply and nominate a representative to capture minutes and record the meeting/s.

- » In the event of the grievance, with the assistance of the mediator, being resolved to the satisfaction of all the parties concerned, the outcome must be recorded and signed off by the relevant parties, including the mediator. The record should provide details on the date of the meeting/s, the names of the people that attended the meeting/s, the outcome of the meeting/s, and where relevant, the measures identified to address the grievance, the party responsible for implementing the required measures, and the agreed upon timeframes for the measures to be implemented.
- » In the event of the dispute not being resolved, the mediator must prepare a draft report that summaries the nature of the grievance and the dispute. The report should include a recommendation by the mediator on the proposed way forward with regard to the addressing the grievance.
- » The draft report must be made available to the Complainant and the Developer for comment before being finalised and signed by all parties, which signature may not be unreasonably withheld by either party. Unless otherwise agreed, comments on the draft report must be forwarded to the company representative appointed to manage the grievance mechanism within 5 working days. The way forward will be informed by the recommendations of the mediator and the nature of the grievance.

A Complaint is closed out when no further action is required, or indeed possible. Closure status must be classified and captured following mediation or successful resolution in the Complaints Register as follows:

- » Resolved. Complaints where a resolution has been agreed and implemented and the Complainant has signed the Confirmation Form.
- » Unresolved. Complaints where it has not been possible to reach an agreed resolution despite mediation.
- » Abandoned. Complaints where the Complainant is not contactable after one month following receipt of a Complaint and efforts to trace his or her whereabouts have been unsuccessful.

The grievance mechanism does not replace the right of an individual, community, group or organization to take legal action should they so wish. In the event of the grievance not being resolved to the satisfaction of Complainant and or the Developer, either party may be entitled to legal action if an appropriate option, however, this grievance mechanisms aims to avoid such interactions by addressing the grievances within a short timeframe, and to mutual satisfaction, where possible.

ALIEN PLANT AND OPEN SPACE MANAGEMENT PLAN

1. PURPOSE

Invasive alien plant species pose the second largest threat to biodiversity after direct habitat destruction. The purpose of this Alien Plant and Open Space Management Plan is to provide a framework for the management of alien and invasive plant species during the construction and operation of the Thermal Plant and upgraded access road. The broad objectives of the plan include the following:

- » Ensure alien plants do not become dominant in parts of the site, or the whole site, through the control and management of alien and invasive species presence, dispersal and encroachment.
- » Develop and implement a monitoring and eradication programme for alien and invasive plant species.
- » Promote the natural re-establishment and planting of indigenous species in order to retard erosion and alien plant invasion.

This plan should be updated throughout the life cycle of the project, as required in order to ensure that appropriate measures are in place to manage and control the establishment of alien and invasive plant species and to ensure compliance with relevant legislation. This plan should be implemented with specific focus on sensitive areas.

2. LEGISLATIVE CONTEXT

Conservation of Agricultural Resources Act (Act No. 43 of 1983)

In terms of the amendments to the regulations under the Conservation of Agricultural Resources Act (Act No. 43 of 1983), all declared alien plant species must be effectively controlled. Landowners are legally responsible for the control of invasive alien plants on their properties. In terms of this Act alien invasive plant species are ascribed to one of the following categories:

- » Category 1: Prohibited and must be controlled.
- » Category 2 (commercially used plants): May be grown in demarcated areas provided that there is a permit and that steps are taken to prevent their spread.
- » Category 3 (ornamentally used plants): May no longer be planted. Existing plants may be retained as long as all reasonable steps are taken to prevent the spreading thereof, except within the flood line of watercourses and wetlands.

National Environmental Management: Biodiversity Act, 2004 (Act No.10 of 2004)

The National Environmental Management: Biodiversity Act (NEM:BA) regulates all invasive organisms in South Africa, including a wide range of fauna and flora. Regulations have been published in Government Notices R.506, R.507, R.508 and R.509 of 2013 under NEM:BA. According to this Act and the regulations, any species designated under Section 70 cannot be propagated, grown, bought or sold without a permit. Below is an explanation of the three categories:

- » **Category 1a:** Invasive species requiring compulsory control. Any specimens of Category 1a listed species need, by law, to be eradicated from the environment. No permits will be issued.

- » **Category 1b:** Invasive species requiring compulsory control as part of an invasive species control programme. Remove and destroy. These plants are deemed to have such a high invasive potential that infestations can qualify to be placed under a government sponsored invasive species management programme. No permits will be issued.
- » **Category 2:** Invasive species regulated by area. A demarcation permit is required to import, possess, grow, breed, move, sell, buy or accept as a gift any plants listed as Category 2 plants. No permits will be issued for Category 2 plants to exist in riparian zones.
- » **Category 3:** Invasive species regulated by activity. An individual plant permit is required to undertake any of the following restricted activities (import, possess, grow, breed, move, sell, buy or accept as a gift) involving a Category 3 species. No permits will be issued for Category 3 plants to exist in riparian zones.

The following guide is a useful starting point for the identification of alien plant species: Bromilow, C. 2010. Problem Plants and Alien Weeds of South Africa. Briza, Pretoria.

It is important to note that alien plant species that are regulated in terms of the Conservation of Agricultural Resources Act (Act 43 of 1983) (CARA) as weeds and invader plants are exempted from NEM:BA. This implies that the provisions of the CARA in respect of listed weed and invader plants supersede those of NEM: BA.

3. ALIEN PLANT MANAGEMENT PRINCIPLES

3.1. Prevention and early eradication

A prevention strategy should be considered and established, including regular surveys and monitoring for invasive alien plants, effective rehabilitation of disturbed areas and prevention of unnecessary disturbance of natural areas.

Monitoring plans should be developed which are designed to identify Invasive Alien Plant Species already on site, as well as those that are introduced to the site by the construction activities. Keeping up to date on which weeds are an immediate threat to the site is important, but efforts should be planned to update this information on a regular basis. When additional Invasive Alien Plant Species are recorded on site, an immediate response of locating the site for future monitoring and either hand-pulling the weeds or an application of a suitable herbicide (where permissible only) should be planned. It is, however, better to monitor regularly and act swiftly than to allow invasive alien plants to become established on site.

3.2. Containment and control

If any alien invasive plants are found to become established on site, action plans for their control should be developed, depending on the size of the infestations, budgets, manpower considerations and time. Separate plans of control actions should be developed for each location and/or each species. Appropriate registered chemicals and other possible control agents should be considered in the action plans for each site/species. The uses of chemicals are not recommended for any wetland areas. Herbicides should be applied directly to the plant and not to the soil. The key is to ensure that no invasions get out of control. Effective containment and control will ensure that the least energy and resources are required to maintain this status over the long-term. This will also be an indicator that natural systems are impacted to the smallest degree possible.

3.3. General Clearing and Guiding Principles

Alien species control programmes are long-term management projects and should consist of a clearing plan which includes follow up actions for rehabilitation of the cleared area. The lighter infested areas should be cleared first to prevent the build-up of seed banks. Pre-existing dense mature stands ideally should be left for last, as they probably won't increase in density or pose a greater threat than they are currently. Collective management and planning with neighbours may be required in the case of large woody invaders as seeds of alien species are easily dispersed across boundaries by wind or watercourses. All clearing actions should be monitored and documented to keep records of which areas are due for follow-up clearing.

i. Clearing Methods

Different species require different clearing methods such as manual, chemical or biological methods or a combination of both. Care should however be taken that the clearing methods used do not encourage further invasion and that they are appropriate to the specific species of concern. As such, regardless of the methods used, disturbance to the soil should be kept to a minimum.

Fire should not be used for alien species control or vegetation management at the site. The best-practice clearing method for each species identified should be used.

» Mechanical control

This entails damaging or removing the plant by physical action. Different techniques could be used, e.g. uprooting, felling, slashing, mowing, ringbarking or bark stripping. This control option is only really feasible in sparse infestations or on a small scale, and for controlling species that do not coppice after cutting. Species that tend to coppice, need to have the cut stumps or coppice growth treated with herbicides following the mechanical treatment. Mechanical control is labour intensive and therefore expensive, and could cause severe soil disturbance and erosion.

» Chemical Control

Although it is usually preferable to use manual clearing methods where possible, such methods may create additional disturbance which stimulates alien plant invasion and may also be ineffective for many woody species which re-sprout. Where herbicides are to be used, the impact of the operation on the natural environment should be minimised by observing the following:

- * Area contamination must be minimised by careful, accurate application with a minimum amount of herbicide to achieve good control.
- * All care must be taken to prevent contamination of any water bodies. This includes due care in storage, application, cleaning equipment and disposal of containers, product and spray mixtures.
- * Equipment should be washed where there is no danger of contaminating water sources and washings carefully disposed of at a suitable site.
- * To avoid damage to indigenous or other desirable vegetation, products should be selected that will have the least effect on non-target vegetation.
- * Coarse droplet nozzles should be fitted to avoid drift onto neighbouring vegetation.
- * The appropriate health and safety procedures should also be followed regarding the storage, handling and disposal of herbicides.
- * The use of chemicals is not recommended for wetland areas.

For all herbicide applications, the following Regulations and guidelines should be followed:

- * Working for Water: Policy on the Use of Herbicides for the Control of Alien Vegetation.
- * Pesticide Management Policy for South Africa published in terms of the Fertilizers, Farm Feeds, Agricultural Remedies and Stock Remedies Act, 1947 (Act No. 36 of 1947) – GNR 1120 of 2010.
- * South African Bureau of Standards, Standard SANS 10206 (2010).

According to Government Notice No. 13424 dated 26 July 1992, it is an offence to “*acquire, dispose, sell or use an agricultural or stock remedy for a purpose or in a manner other than that specified on the label on a container thereof or on such a container*”.

Contractors using herbicides need to have a valid Pest Control Operators License (limited weeds controller) according to the Fertilizer, Farm Feeds, Agricultural Remedies and Stock Remedies Act (Act No. 36 of 1947). This is regulated by the Department of Agriculture, Forestry and Fisheries.

» **Biological control**

Biological weed control consists of the use of natural enemies to reduce the vigour or reproductive potential of an invasive alien plant. Biological control agents include insects, mites, and micro-organisms such as fungi or bacteria. They usually attack specific parts of the plant, either the reproductive organs directly (flower buds, flowers or fruit) or the seeds after they have dropped. The stress caused by the biological control agent may kill a plant outright or it might impact on the plant's reproductive capacity. In certain instances, the reproductive capacity is reduced to zero and the population is effectively sterilised. All of these outcomes will help to reduce the spread of the species.

To obtain biocontrol agents, provincial representatives of the Working for Water Programme or the Directorate: Land Use and Soil Management (LUSM), Department of Agriculture, Forestry and Fisheries (DAFF) can be contacted.

3.4. General management practices

The following general management practices should be encouraged or strived for:

- » Establish an on-going monitoring programme for construction phase to detect and quantify any alien species that may become established.
- » Alien vegetation regrowth on areas disturbed by construction must be immediately controlled.
- » Care must be taken to avoid the introduction of alien invasive plant species to the site. Particular attention must be paid to imported material such as building sand or dirty earth-moving equipment. Stockpiles should be checked regularly and any weeds emerging from material stockpiles should be removed.
- » Cleared areas that have become invaded by alien species can be sprayed with appropriate herbicides provided that these herbicides break down on contact with the soil. Residual herbicides should not be used.
- » The effectiveness of vegetation control varies seasonally and this is also likely to impact alien species. Control early in the wet season will allow species to re-grow, and follow-up control is likely to be required. It is tempting to leave control until late in the wet season to avoid follow-up control. However, this may allow alien species to set seed before control, and hence will not contribute towards reducing alien species abundance. Therefore, vegetation control should be aimed at the

middle of the wet season, with a follow-up event towards the end of the wet season. There are no exact dates that can be specified here as each season is unique and management must therefore respond according to the state and progression of the vegetation.

- » Alien plant management is an iterative process and it may require repeated control efforts to significantly reduce the abundance of a species. This is often due to the presence of large and persistent seed banks. However, repeated control usually results in rapid decline once seed banks become depleted.
- » Some alien species are best individually pulled by hand. Regular vegetation control to reduce plant biomass within the site should be conducted. This should be timed so as to coincide with the critical growth phases of the most important alien species on site. This will significantly reduce the cost of alien plant management as this should contribute towards the control of the dominant alien species and additional targeted control will be required only for a limited number of species.
- » No alien species should be cultivated on-site. If vegetation is required for aesthetic purposes, then non-invasive, water-wise locally-occurring species should be used.
- » During operation, surveys for alien species should be conducted regularly. It is recommended that this be undertaken every 6 months for the first two years after construction and annually thereafter. All alien plants identified should be cleared using appropriate means.

3.5. Monitoring

In order to assess the impact of clearing activities, follow-ups and rehabilitation efforts, monitoring must be undertaken. This section provides a description of a possible monitoring programme that will provide an assessment of the magnitude of alien plant invasion on site, as well as an assessment of the efficacy of the management programme.

In general, the following principles apply for monitoring:

- » Photographic records must be kept of areas to be cleared prior to work starting and at regular intervals during initial clearing activities. Similarly, photographic records should be kept of the area from immediately before and after follow-up clearing activities. Rehabilitation processes must also be recorded.
- » Simple records must be kept of daily operations, e.g. area/location cleared, labour units and, if ever used, the amount of herbicide used.
- » It is important that, if monitoring results in detection of invasive alien plants, that this leads to immediate action.

The following monitoring should be implemented to ensure management of alien invasive plant species.

Construction Phase

| Monitoring Action | Indicator | Timeframe |
|--|--|--|
| Document alien species present at the site | List of alien plant species | Preconstruction Monthly during Summer and Autumn (Middle November to end March) 3 Monthly during Winter and Spring |
| Document alien plant distribution | Alien plant distribution map within priority areas | 3 Monthly |
| Document & record alien plant control measures implemented | Record of clearing activities | 3 Monthly |

Operation Phase

| Monitoring Action | Indicator | Timeframe |
|--|--|------------------|
| Document alien plant species distribution and abundance over time at the site | Alien plant distribution map | Biannually |
| Document alien plant control measures implemented & success rate achieved | Records of control measures and their success rate. A decline in alien distribution and cover over time at the site | Biannually |
| Document rehabilitation measures implemented and success achieved in problem areas | Decline in vulnerable bare areas over time | Biannually |

SEARCH AND RESCUE AND PROTECTION PLAN

1. PURPOSE

The purpose of the Search and Rescue and Protection Plan is to implement avoidance and mitigation measures, in addition to the mitigations included in the EMP to reduce the impact of the 132kV transmission infrastructure establishment on listed and protected plant species and their habitats during construction and operation. This subplan is required in order to ensure compliance with national and provincial legislation for vegetation clearing and any required destruction or translocation of provincially and nationally protected species within the development footprint.

The Plan first provides some legislative background on the regulations relevant to listed and protected species, under the TOPS, NC Nature Conservation Act and National List of Protected Tree Species. This is followed by an identification of protected species present within the development area and actions that should be implemented to minimise impact on these species and comply with legislative requirements.

2. IDENTIFICATION OF SPECIES OF CONSERVATION CONCERN

Plant species are protected at the national level as well as the provincial level and different permits may be required for different species depending on their protection level. At the national level, protected trees are listed by the Department of Forestry, Fisheries and the Environment (DFFE) under the National List of Protected Trees, which is updated on a regular basis. Any clearing of nationally protected trees requires a permit from DFFE. At the provincial level, all species red-listed under the Red List of South African plants (<http://redlist.sanbi.org/>) as well as species listed under the NC Nature Conservation Act are protected and require provincial permits. The NC Nature Conservation Act lists a variety of species as protected but also several whole families and genera as protected.

Protected fauna species red-listed under the Red List of South African plants (<http://redlist.sanbi.org/>) as well as species listed under the NC Nature Conservation Act are protected and require provincial permits. The NC Nature Conservation Act lists a variety of species as protected but also several whole families and genera as protected.

3. IDENTIFICATION OF LISTED SPECIES

According to the DFFE Screening Tool, there are no plant species of concern that are known to occur in the immediate vicinity of the Kotulo Tsatsi PV 3 footprint area. No plant species of concern were observed during the field assessment, with the result that the sensitivity of the site can be confirmed to be low. There are however several provincially protected species present on the site including all *Aloe* species present, all *Amaryllidaceae*, all *Asclepiadaceae*, all *Iridaceae*, all *Mesembryanthemaceae* and any other species as listed in the Northern Cape Nature Conservation Act 9 of 2009. These species would require a permit to destroy or translocate should the project commence to construction.

4. MITIGATION & AVOIDANCE OPTIONS

The primary mitigation and avoidance measure that must be implemented at the pre-construction phase is the Pre-construction Walk-Through of the development footprint. This defines which and how many individuals of listed and protected species are found within the development footprint. This information is required for the DFFE and NC Nature Conservation permits which must be obtained before construction can commence.

Where listed species fall within the development footprint and avoidance is not possible, then it may be possible to translocate the affected individuals outside of the development footprint. However, not all species are suitable for translocation as only certain types of plants are able to survive the disturbance. Suitable candidates for translocation include most geophytes and succulents. Although there are exceptions, the majority of woody species do not survive translocation well and it is generally not recommended to try and attempt to translocate such species. Recommendations in this regard would be made following the walk-through of the facility footprint before construction, where all listed and protected species within the development footprint will be identified and located.

5. RESCUE AND PROTECTION PLAN

5.1. Pre-construction

- » Identification of all listed species which may occur within the site, based on the SANBI POSA database as well as the specialist BA studies for the site and any other relevant literature.
- » Before construction commences at the site, the following actions should be taken:
 - A walk-through of the final development footprint by a suitably qualified botanist/ecologist to locate and identify all listed and protected species which fall within the development footprint. This should happen during the flowering season at the site which, depending on rainfall, is likely to be during spring to early summer (August-October).
 - A walk-through report following the walk-through which identifies areas where minor deviations to roads and other infrastructure can be made to avoid sensitive areas and important populations of listed species must be compiled. The report should also contain a full list of localities where listed species occur within the development footprint and the number of affected individuals in each instance, so that this information can be used to comply with the permit conditions required by the relevant legislation. Those species suitable for search as rescue should be identified in the walk-through report.
 - A permit to clear the site and relocate species of concern is required from NC DAEARD&LR before construction commences.
 - A tree clearing permit is also required from DFFE to clear protected trees from the site.
 - Once the permits have been issued, there should be a search and rescue operation of all listed species that cannot be avoided, which have been identified in the walk-through report as being suitable for search and rescue within the development footprint. Affected individuals should be translocated to a similar habitat outside of the development footprint and marked for monitoring purposes.

5.2. Construction

- » Vegetation clearing should take place in a phased manner, so that large cleared areas are not left standing with no activity for long periods of time and pose a wind and water erosion risk. This will require

coordination between the contractor and EO, to ensure that the EO is able to monitor activities appropriately.

- » All cleared material should be handled according to the Revegetation and Rehabilitation Plan and used to encourage the recovery of disturbed areas.
- » EO to monitor vegetation clearing at the site. Any deviations from the plans that may be required should first be checked for listed species by the EO and any listed species present which are able to survive translocation should be translocated to a safe site.
- » All areas to be cleared should be demarcated with construction tape, survey markers or similar. All construction vehicles should work only within the designated area.
- » Plants suitable for translocation or for use in rehabilitation of already cleared areas should be identified and relocated before general clearing takes place.
- » Any listed species observed within the development footprint that were missed during the pre-construction plant sweeps should be translocated to a safe site before clearing commences.
- » Many listed species are also sought after for traditional medicine or by collectors and so the EO and ECO should ensure that all staff attend environmental induction training in which the legal and conservation aspects of harvesting plants from the wild are discussed.
- » The EO should monitor construction activities in sensitive habitats such as in dune areas carefully to ensure that impacts to these areas are minimised.

5.3. Operation

- » Access to the site should be strictly controlled and all personnel entering or leaving the site should be required to sign in and out with the security officers.
- » The collecting of plants or their parts should be strictly forbidden and signs stating so should be placed at the entrance gates to the site.

6. MONITORING & REPORTING REQUIREMENTS

The following reporting and monitoring requirements are recommended as part of the plant rescue and protection plan:

- » Pre-construction walk-through report detailing the location and distribution of all listed and protected species must be compiled. This should include a walk-through of all infrastructure including all new access roads, cables, buildings and substations. The report should include recommendations of route adjustments where necessary, as well as provide a full account of how many individuals of each listed species will be impacted by the development. Details of plants suitable for search and rescue must also be included.
- » Permit applications to NC DAEARD&LR and DFFE. This requires the walk-through report as well as the identification and quantification of all listed and protected species within the development footprint. The permit is required before any search and rescue or vegetation clearance can take place. Where large numbers of listed species are affected, a site inspection and additional requirements may be imposed by NC DAEARD&LR and DFFE as part of the permit conditions. All documentation associated with this process needs to be retained and the final clearing permit should be kept at the site.
- » Active daily monitoring of clearing during construction by the EO must be undertaken to ensure that listed species and sensitive habitats are avoided. All incidents should be recorded along with the remedial measures implemented.

- » Post construction monitoring of plants translocated during search and rescue to evaluate the success of the intervention. Monitoring for a year post-transplant should be sufficient to gauge success.

REVEGETATION AND REHABILITATION PLAN

1. PURPOSE

The purpose of the Rehabilitation Plan is to ensure that areas cleared or impacted during construction activities within the site for the thermal plant and upgraded access road, and that are not required for operation are rehabilitated to their original state before the operation phase commences, and that the risk of erosion from these areas is reduced. The purpose of the Rehabilitation Plan for the site can be summarised as follows:

- » Achieve long-term stabilisation of all disturbed areas.
- » Re-vegetate all disturbed areas with suitable local plant species.
- » Minimise visual impact of disturbed areas.
- » Ensure that disturbed areas are rehabilitated to a condition similar to that found prior to disturbance.

This Rehabilitation Plan should be read in conjunction with other site-specific plans, including the Erosion Management Plan, Soil Management Plan, Alien Invasive Management Plan and Plant Rescue and Protection Plan. Prior to the commencement of construction, a detailed Rehabilitation Plan and Method Statement for the site should be compiled with the aid of a suitably qualified, professionally registered specialist (with a botanical or equivalent qualification).

2. RELEVANT ASPECTS OF THE SITE

The Kotulo Tsatsi PV 3 Facility falls almost entirely within the Bushmanland Basin Shrubland vegetation type, with two pans present that represent the Bushmanland Vloere vegetation type, that would not be built onto. Bushmanland Basin Shrubland is an extensive vegetation type that occupies over 34 000 km² of the Northern Cape and is among the most extensive vegetation types in South Africa. As a result of the arid nature of the area, very little of this vegetation type has been affected by intensive agriculture and it is classified as Least Threatened. The field assessment identified the following species as common and characteristic species at the site: Shrubs such as *Rhigozum trichotomum*, *Phaeoptilum spinosum*, *Lycium pumilum*, *Aizoon schellenbergii*, *Osteospermum armatum*, *Eriocephalus pauperimus*, *Rosenia glandulosa*, *Pteronia leucoclada*, *P.glomerata*, *P.sordida*, *P.leucoclada*, *Salsola tuberculata*, *Sarcocaulon patersonii*, *Hermannia spinosa*, *Osteospermum armatum*, and *Zygophyllum chrysopterum*. Grasses present include *Stipagrostis ciliate*, *Stipagrostis obtusa*, *Stipagrostis uniplumis* *Enneapogon scaber*, *E.desvauxii*, *Fingerhuthia africana* and *Aristida adscensionis*. The only species of significance present are occasional individuals of the provincially protected species *Aloe claviflora* and *Hoodia gordonii* which occur at a low density.

3. REHABILITATION METHODS AND PRACTISES

The following general management practices should be encouraged or strived for:

- » Clearing of invaded areas should be conducted as per the Alien Management Plan, included in the EMPr.
- » No harvesting of vegetation may be undertaken outside the area to be disturbed by construction activities.

- » Indigenous plant material must be kept separate from alien material.
- » Indigenous seeds may be harvested for purposes of revegetation in areas that are free of alien invasive vegetation, either at the site prior to clearance or from suitable neighbouring sites.
- » Topsoil should be reserved wherever possible on site, to be utilised during rehabilitation.
- » Sods used for revegetation should be obtained directly from the site, but not from the sensitive areas. Sods should contain at least a 50 mm topsoil layer and be minimally disturbed, in particular to existing root systems. Sods must ideally be obtained from areas as close as possible to the region that is to be rehabilitated.
- » Water used for the irrigation of re-vegetated areas should be free of chlorine and other pollutants that might have a detrimental effect on the plants.
- » All seeded, planted or sodded grass areas and all shrubs or trees planted are to be irrigated at regular intervals.
- » On steep slopes and areas where seed and organic matter retention is low, it is recommended that soil savers are used to stabilise the soil surface. Soil savers are man-made materials, usually constructed of organic material such as hemp or jute and are usually applied in areas where traditional rehabilitation techniques are not likely to succeed.
- » In areas where soil saver is used, it should be pegged down to ensure that it captures soil and organic matter flowing over the surface.
- » The final rehabilitated area should resemble the current composition and structure of the soil as far as practicably possible.
- » Progressive rehabilitation is an important element of the rehabilitation strategy and should be implemented where feasible.
- » No construction equipment, vehicles or unauthorised personnel should be allowed onto areas that have been rehabilitated.
- » Where rehabilitation sites are located within actively grazed areas, they should be fenced off, this must be undertaken in consultation with the landowner.
- » Any runnels, erosion channels or wash-aways developing after revegetation should be backfilled and consolidated and the areas restored to a proper stable condition.
- » Re-vegetated areas should be monitored frequently and prepared and revegetation from scratch should inadequate signs of surface coverage or growth be evident after two growth seasons. Adequate recovery must be assessed by a qualified botanist or rehabilitation specialist.
- » The stockpiled vegetation from the clearing operations should be reduced to mulch where possible, and retained along with topsoil to encourage seedbank regrowth and soil fertility.
- » Mulches must be collected in such a manner as to restrict the loss of seed.
- » Mulch must be stored for as short a period as possible.
- » Mulch is to be harvested from areas that are to be denuded of vegetation during construction activities, provided that they are free of seed-bearing alien invasive plants.
- » Where herbicides are used to clear vegetation, species-specific chemicals should be applied to individual plants only. General spraying should be strictly prohibited, and only the correct herbicide type should be applied.
- » Once rehabilitated, areas should be protected to prevent trampling and erosion.
- » Fencing should be removed once a sound vegetative cover has been achieved.

4. MONITORING AND FOLLOW-UP ACTION

Throughout the lifecycle of the development, regular monitoring and adaptive management must be in place to detect any new degradation of rehabilitated areas. During the construction phase, the

Environmental Officer (EO) and EPC Contractor will be responsible for initiating and maintaining a suitable monitoring system. Once the development is operational, the Developer will need to identify a suitable entity that will be able to take over and maintain the monitoring cycle and initiate adaptive management as soon as it is required. Monitoring personnel must be adequately trained.

The following are the minimum criteria that should be monitored:

- » Associated nature and stability of surface soils.
- » Re-emergence of alien and invasive plant species. If noted, remedial action must be taken immediately, as per the alien management plan and mitigation measures contained within the EMPr.

Rehabilitation success, monitoring and follow-up actions are important to achieve the desired cover and soil protection. The following monitoring protocol is recommended:

- » Rehabilitation areas should be monitored every 4 months for the first 12 months following construction, or as per the recommendations of specialist.
- » Ensure that steep slopes are not de-vegetated unnecessarily and subsequently become hydrophobic (i.e. have increased runoff and a decreased infiltration rate) increasing the erosion potential.
- » Soil loss is related to the length of time that soils are exposed prior to rehabilitation or stabilisation. Therefore, the timeframe between construction activities and rehabilitation should be minimised. Phased construction and progressive rehabilitation, where practically possible, are therefore important elements of the erosion control and rehabilitation strategy.
- » Any areas showing erosion, should be adaptively managed with particular erosion control measures, depending on the situation.

If the current state of the environment prior to construction (which will be disturbed during the construction phase) is not achieved post impact, within the specified rehabilitation period, maintenance of these areas must continue until an acceptable state is achieved (excluding alien plant species or weeds). Additional rehabilitation methods may be necessary to achieve the current state before construction commenced.

Monitoring of the rehabilitation success, as well as follow-up adaptive management, combined with the clearing of emerging alien plant species should all continue for as long as is considered necessary, depending on regrowth rates.

PRINCIPLES FOR EROSION MANAGEMENT

1. PURPOSE

Exposed and unprotected soils are the main cause of erosion in most situations. Therefore, this Erosion Management Plan, the Storm water Management Plan and the Revegetation and Rehabilitation Plan are closely linked to one another and should not operate independently but should rather be seen as complementary activities within the broader environmental management of the site and should therefore be managed together.

This Erosion Management Plan addresses the management and mitigation of potential impacts relating to soil erosion. The objective of the plan is to provide:

- » A general framework for soil erosion and sediment control, which enables the contractor to identify areas where erosion can occur and is likely to be accelerated by construction related activities.
- » An outline of general methods to monitor, manage and rehabilitate erosion prone areas, ensuring that all erosion resulting from all phases of the development is addressed.

This plan must be updated and refined once the construction/ civil engineering plans have been finalised following detailed design.

2. RELEVANT ASPECTS OF THE SITE

The vegetation characteristics of all of the freshwater resource features have been impacted by grazing in the past and have allowed for some encroachment of especially *Rhigozum trichotomum* within the ephemeral wash and drainage systems and *Rosenia spinescens* within some portions of the depression wetland. Some of the smaller ephemeral washes as well as the "vloere" located within the larger ephemeral washes, contain old (historical) plough lines. It is unclear if these ploughing activities were an attempt to cultivate within the deeper soil profiles or if it was an attempt to facilitate vegetation establishment. Other, "minor" impacts include twin track crossings, farm fences, soil capping and sheet erosion. A few of the ephemeral washes to the north and east are crossed by the larger gravel access route.

Subsequently, the majority of these freshwater systems are still in a mostly natural, functional condition. The medium sensitive minor washes are not considered no-go areas. However, development within these areas shall be subjected to strict mitigation measures including the management of surface water runoff, erosion monitoring and mitigation as well as constraints regarding the clearing of vegetation within these areas. Where new water course crossings are required, the engineering team must provide an effective means to minimise the potential upstream and downstream effects of sedimentation and erosion (erosion protection) as well minimise the loss of riparian vegetation (reduce footprint as much as possible).

3. EROSION AND SEDIMENT CONTROL PRINCIPLES

The goals of erosion control during and after construction at the site should be to:

- » Protect the land surface from erosion;
- » Intercept and safely direct run-off water from undisturbed upslope areas through the site without allowing it to cause erosion within the site or become contaminated with sediment; and
- » Progressively revegetate or stabilise disturbed areas.

These goals can be achieved by applying the management practices outlined in the following sections.

3.1. On-Site Erosion Management

General factors to consider regarding erosion risk at the site includes the following:

- » Due to the sandy nature of soils in the study area, soil loss will be greater during dry periods as it is more prone to wind erosion. Therefore, precautions to prevent erosion should be present throughout the year.
- » Soil loss will be greater on steeper slopes. Ensure that steep slopes are not de-vegetated unnecessarily and subsequently become hydrophobic (i.e., have increased runoff and a decreased infiltration rate) increasing the erosion potential.
- » Soil loss is related to the length of time that soils are exposed prior to rehabilitation or stabilisation. Therefore, the gap between construction activities and rehabilitation should be minimised. Phased construction and progressive rehabilitation, where practically possible, are therefore important elements of the erosion control strategy.
- » The extent of disturbance will influence the risk and consequences of erosion. Therefore, site clearing should be restricted to areas required for construction purposes only. As far as possible, large areas should not be cleared all at once, especially in areas where the risk of erosion is higher.
- » Roads should be planned and constructed in a manner which minimises their erosion potential. Roads should therefore follow the natural contour as far as possible. Roads parallel to the slope direction should be avoided as far as possible.
- » Where necessary, new roads constructed should include water diversion structures with energy dissipation features present to slow and disperse the water into the receiving area.
- » Roads used for project-related activities and other disturbed areas should be regularly monitored for erosion. Any erosion problems recorded should be rectified as soon as possible and monitored thereafter to ensure that they do not re-occur.
- » Runoff may have to be specifically channeled or storm water adequately controlled to prevent localised rill and gully erosion.
- » Compacted areas should have adequate drainage systems to avoid pooling and surface flow. Heavy machinery should not compact those areas which are not intended to be compacted as this will result in compacted hydrophobic, water repellent soils which increase the erosion potential of the area. Where compaction does occur, the areas should be ripped.
- » All bare areas should be revegetated with appropriate locally occurring species, to bind the soil and limit erosion potential.
- » Silt fences should be used where there is a danger of topsoil or material stockpiles eroding and entering streams and other sensitive areas.

- » Gabions and other stabilisation features must be used on steep slopes and other areas vulnerable to erosion to minimise erosion risk as far as possible.
- » Activity at the site after large rainfall events when the soils are wet and erosion risk is increased should be reduced. No driving off of hardened roads should occur at any time, and particularly immediately following large rainfall events.
- » Topsoil should be removed and stored in a designated area separately from subsoil and away from construction activities (as per the recommendations in the EMPr). Topsoil should be reapplied where appropriate as soon as possible in order to encourage and facilitate rapid regeneration of the natural vegetation in cleared areas.
- » Regular monitoring of the site for erosion problems during construction (on-going) and operation (at least twice annually) is recommended, particularly after large summer thunderstorms have been experienced. The ECO will determine the frequency of monitoring based on the severity of the impacts in the erosion prone areas.

3.1.1. Erosion control mechanisms

The contractor may use the following mechanisms (whichever proves more appropriate/ effective) to combat erosion when necessary:

- » Reno mattresses;
- » Slope attenuation;
- » Hessian material;
- » Shade catch nets;
- » Gabion baskets;
- » Silt fences;
- » Storm water channels and catch pits;
- » Soil bindings;
- » Geofabrics;
- » Hydro-seeding and/or re-vegetating;
- » Mulching over cleared areas;
- » Boulders and size varied rocks; and
- » Tilling.

3.2. Engineering Specifications

A detailed engineering specifications Storm water Management Plan describing and illustrating the proposed stormwater control measures must be prepared by the Civil Engineers during the detailed design phase and should be based on the underlying principles of the Storm water Management Plan (**Appendix H** of the EMPr) and this should include erosion control measures. Requirements for project design include:

- » Erosion control measures to be implemented before and during the construction period, including the final storm water control measures (post construction).
- » All temporary and permanent water management structures or stabilisation methods must be indicated within the Storm water Management Plan.
- » An on-site Engineer or Environmental Officer (EO)/ SHE Representative to be responsible for ensuring implementation of the erosion control measures on site during the construction period. The ECO

should monitor the effectiveness of these measures on the interval agreed upon with the Site Manager and EO.

- » The EPC Contractor holds ultimate responsibility for remedial action in the event that the approved Storm water Management Plan is not correctly or appropriately implemented and damage to the environment is caused.

3.3. Monitoring

The site must be monitored continuously during construction and operation in order to determine any indications of erosion. If any erosion features are recorded as a result of the activities on-site the Environmental Officer (EO)/ SHE Representative (during construction) or Environmental Manager (during operation) must:

- » Assess the significance of the situation.
- » Take photographs of the soil degradation.
- » Determine the cause of the soil erosion.
- » Inform the contractor/operator that rehabilitation must take place and that the contractor/operator is to implement a rehabilitation method statement and management plan to be approved by the Site/Environmental Manager in conjunction with the ECO.
- » Monitor that the contractor/operator is taking action to stop the erosion and assist them where needed.
- » Report and monitor the progress of rehabilitation weekly and record all the findings in a site register (during construction).
- » All actions with regards to the incidents must be reported on a monthly compliance report which should be kept on file for if/when the Competent Authority requests to see it (during construction) and kept on file for consideration during the annual audits (during construction and operation).

The Contractor (in consultation with an appropriate specialist, e.g. an engineer) must:

- » Select a system/mechanism to treat the erosion.
- » Design and implement the appropriate system/mechanism.
- » Monitor the area to ensure that the system functions like it should. If the system fails, the method must be adapted or adjusted to ensure the accelerated erosion is controlled.
- » Continue monitoring until the area has been stabilised.

4. CONCLUSION

The Erosion Management Plan is a document to assist the Proponent/ EPC Contractor with guidelines on how to manage erosion during all phases of the project. The implementation of management measures is not only good practice to ensure minimisation of degradation, but also necessary to ensure compliance with legislative requirements. This document forms part of the EMPr and is required to be considered and adhered to during the design, construction, operation and decommissioning phases of the project (if and where applicable). During the construction phase, the contractor must prepare an Erosion Control Method Statement to ensure that all construction methods adopted on site do not cause, or precipitate soil erosion and shall take adequate steps to ensure that the requirements of this plan are met before, during and after construction. The designated responsible person on site, must be indicated in the Method

Statement and shall ensure that relevant erosion control measures are in place throughout the construction phase.

An operation phase Erosion Management Plan should be designed and implemented if not already addressed by the mitigations implemented as part of construction, with a view to preventing the passage of concentrated flows off hardened surfaces and onto natural areas.

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STORMWATER MANAGEMENT PLAN

1. PURPOSE

By taking greater cognisance of natural hydrological patterns and processes it is possible to develop storm water management systems in a manner that reduces these potentially negative impacts and mimic nature. The main risks associated with inappropriate storm water management are increased erosion risk and risks associated with flooding. Therefore, this Storm water Management Plan and the Erosion Management Plan are closely linked to one another and should be managed together.

This Storm water Management Plan addresses the management of storm water runoff from the development site and significant impacts relating to resultant impacts such as soil erosion and downstream sedimentation. The main factors influencing the planning of storm water management measures and infrastructure are:

- » Topography and slope gradients;
- » Placing of infrastructure and infrastructure design;
- » Annual average rainfall; and
- » Rainfall intensities.

The objective of the plan is therefore to provide measures to address runoff from disturbed portions of the site, such that they:

- » do not result in concentrated flows into natural watercourses i.e., provision should be made for temporary or permanent measures that allow for attenuation, control of velocities and capturing of sediment upstream of natural watercourses.
- » do not result in any necessity for concrete or other lining of natural watercourses to protect them from concentrated flows off the development if not necessary.
- » do not divert flows out of their natural flow pathways, thus depriving downstream watercourses of water.

This Storm water Management Plan must be updated and refined once the construction/ civil engineering plans have been finalised following detailed design.

2. RELEVANT ASPECTS OF THE SITE

The climate of the Northern Cape is semi-arid with a late summer-autumn rainfall regime. Average rainfall of the area varies from 50 mm to 400 mm per year. Evaporation levels within this province exceed the annual rainfall. Climate conditions are extreme (i.e. very cold in winter and extremely hot in summer). The Kenhardt area (in which the proposed projects fall) has a very low rainfall level, 183 mm per annum, with a standard deviation of 71 mm, according to the South African Rain Atlas (Water Research Commission, undated). It typically receives the lowest rainfall (0 mm) in June and the highest (23 mm) in March (GEOSS, 2015)

Since the area receives most of its rainfall during autumn it has a semi-arid to arid climate (as noted above). The relevance of this information is that the rainfall occurs whilst temperatures are quite high still and associated evaporation rates will be high. The highest temperatures are reached in the summer months (December to January) and the lowest in the winter months (June to August). The average temperature of

the area is 19.6° C, with an annual average high temperature of 28° C and an annual average low temperature of 11° C.

The average daily solar radiation levels in South Africa range between 4.5 and 6.5 kilowatt-hour per square meter (kWh/m²). In South Africa the measured solar radiation is the highest in the Northern Cape, North West Province and the Free State., the site has high solar radiation levels of 2300 kWh/m² per annum or 6.3 kWh/m² per day.

The Kotulo Tsatsi PV 3 Facility falls almost entirely within the Bushmanland Basin Shrubland vegetation type, with two pans present that represent the Bushmanland Vloere vegetation type, that would not be built onto. Bushmanland Basin Shrubland is an extensive vegetation type that occupies over 34 000 km² of the Northern Cape and is among the most extensive vegetation types in South Africa. As a result of the arid nature of the area, very little of this vegetation type has been affected by intensive agriculture and it is classified as Least Threatened. The field assessment identified the following species as common and characteristic species at the site: Shrubs such as *Rhigozum trichotomum*, *Phaeoptilum spinosum*, *Lycium pumilum*, *Aizoon schellenbergii*, *Osteospermum armatum*, *Eriocephalus pauperrimus*, *Rosenia glandulosa*, *Pteronia leucoclada*, *P.glomerata*, *P.sordida*, *P.leucoclada*, *Salsola tuberculata*, *Sarcocaulon patersonii*, *Hermannia spinosa*, *Osteospermum armatum*, and *Zygophyllum chrysopterum*. Grasses present include *Stipagrostis ciliate*, *Stipagrostis obtusa*, *Stipagrostis uniplumis* *Enneapogon scaber*, *E.desvauxii*, *Fingerhuthia africana* and *Aristida adscensionis*. The only species of significance present are occasional individuals of the provincially protected species *Aloe claviflora* and *Hoodia gordonii* which occur at a low density.

The minor ephemeral washes and drainage lines located within the current development footprint is NOT regarded as No-Go Areas for the Solar PV field, roads and underground cables. Storm water run-off infrastructure must be maintained to mitigate both the flow and water quality impacts of any storm water leaving the Solar PV site, especially along these ephemeral systems.

3. STORMWATER MANAGEMENT PRINCIPLES

In the design phase, various storm water management principles should be considered including:

- » Prevent concentration of storm water flow at any point where the ground is susceptible to erosion.
- » Reduce storm water flows as far as possible by the effective use of attenuating devices (such as swales, berms, silt fences). As construction progresses, the storm water control measures are to be monitored and adjusted to ensure complete erosion and pollution control at all times.
- » Silt traps must be used where there is a danger of topsoil or material stockpiles eroding and entering streams and other sensitive areas.
- » Construction of gabions and other stabilisation features on steep slopes may be undertaken to prevent erosion, if deemed necessary.
- » Minimise the area of exposure of bare soils to minimise the erosive forces of wind, water and all forms of traffic.
- » Ensure that development does not increase the rate of storm water flow above that which the natural ground can safely accommodate at any point in the sub-catchments.
- » Ensure that all storm water control works are constructed in a safe and aesthetic manner in keeping with the overall development.
- » Plan and construct storm water management systems to remove contaminants before they pollute surface waters or groundwater resources.

- » Contain soil erosion, whether induced by wind or water forces, by constructing protective works to trap sediment at appropriate locations. This applies particularly during construction.
- » Avoid situations where natural or artificial slopes may become saturated and unstable, both during and after the construction process.
- » Design and construct roads to avoid concentration of flow along and off the road. Where flow concentration is unavoidable, measures to incorporate the road into the pre-development storm water flow should not exceed the capacity of the culvert. To assist with the storm water run-off, gravel roads should typically be graded and shaped with a 2-3% crossfall back into the slope, allowing storm water to be channelled in a controlled manner towards the, natural drainage lines and to assist with any sheet flow on the site.
- » Design culvert inlet structures to ensure that the capacity of the culvert does not exceed the pre-development storm water flow at that point. Provide detention storage on the road and/or upstream of the storm water culvert.
- » Design outlet culvert structures to dissipate flow energy. Any unlined downstream channel must be adequately protected against soil erosion.
- » Where the construction of a building causes a change in the vegetative cover of the site that might result in soil erosion, the risk of soil erosion by storm water must be minimised by the provision of appropriate artificial soil stabilisation mechanisms or re-vegetation of the area. Any inlet to a piped system should be fitted with a screen or grating to prevent debris and refuse from entering the storm water system.
- » Preferably all drainage channels on site and contained within the larger area of the property (i.e. including buffer zone) should remain in the natural state so that the existing hydrology is not disturbed.

3.1. Engineering Specifications

Detailed engineering specifications for a Storm water Management Plan describing and illustrating the proposed storm water control measures must be prepared by the Civil Engineers during the detailed design phase and should be based on the underlying principles of this Storm water Management Plan. This should include erosion control measures. Requirements for project design include:

- » Erosion control measures to be implemented before and during the construction period, including the final storm water control measures (post construction) must be indicated within the Final/Updated Storm water Management Plan.
- » All temporary and permanent water management structures or stabilisation methods must be indicated within the Final/Updated Storm water Management Plan.
- » The drainage system for the site should be designed to specifications that can adequately deal with a 1:50 year intensity rainfall event or more to ensure sufficient capacity for carrying storm water around and away from infrastructure.
- » Procedures for storm water flow through a project site need to take into consideration both normal operating practice and special circumstances. Special circumstances in this case typically include severe rainfall events.
- » An on-site Engineer or Environmental Officer is to be responsible for ensuring implementation of the erosion control measures on site during the construction period.
- » The EPC Contractor holds ultimate responsibility for remedial action in the event that the approved storm water plan is not correctly or appropriately implemented and damage to the environment is caused.

During the construction phase, the contractor must prepare a Storm water Control Method Statement to ensure that all construction methods adopted on site do not cause, or precipitate soil erosion and shall take adequate steps to ensure that the requirements of the Storm water Management Plan are met before, during and after construction. The designated responsible person on site, must be indicated in the Storm water Control Method Statement and shall ensure that no construction work takes place before the relevant storm water control measures are in place.

An operation phase Storm water Management Plan should be designed and implemented if not already addressed by the mitigations implemented as part of construction, with a view to preventing the passage of concentrated flows off hardened surfaces and onto natural areas.

WASTE MANAGEMENT PLAN

1. PURPOSE

A Waste Management Plan (WMP) plays a key role in achieving sustainable waste management throughout all phases of the project. The plan prescribes measures for the collection, temporary storage and safe disposal of the various waste streams associated with the project and includes provisions for the recovery, re-use and recycling of waste. The purpose of this plan is therefore to ensure that effective procedures are implemented for the handling, storage, transportation and disposal of waste generated from the project activities on site.

This WMP has been compiled as part of the project EMPr and is based on waste stream information available at the time of compilation. Construction and operation activities must be assessed on an ongoing basis in order to determine the efficacy of the plan and whether further revision of the plan is required. This plan should be updated once further detail regarding waste quantities and categorisation become available, during the construction and/or operation stages. This plan should be updated throughout the life cycle of the PV Facility, as required in order to ensure that appropriate measures are in place to manage and control waste and to ensure compliance with relevant legislation.

Prior to the commencement of construction, a detailed Waste Management Method Statement for the site should be compiled by the Contractor.

2. RELEVANT ASPECTS OF THE SITE

It is expected that the development of the PV Facility will generate construction solid waste, as well as general waste and hazardous waste during the lifetime of the solar energy facility.

Waste generated on site, originates from various sources, including but not limited to:

- » Concrete waste generated from spoil and excess concrete.
- » Contaminated water, soil, rocks and vegetation due to hydrocarbon spills.
- » Hazardous waste from vehicle, equipment and machinery parts and servicing, fluorescent tubes, used hydrocarbon containers, and waste ink cartridges.
- » Recyclable waste in the form of paper, glass, steel, aluminium, wood/ wood pallets, plastic (PET bottles, PVC, LDPE) and cardboard.
- » Organic waste from food waste as well as alien and endemic vegetation removal.
- » Sewage from portable toilets and septic tanks.
- » Inert waste from spoil material from site clearance and trenching works.

3. LEGISLATIVE REQUIREMENTS

Waste in South Africa is currently governed by several regulations, including:

- » National Environmental Management: Waste Act (NEM:WA), 2008 (Act 59 of 2008);
- » National Environmental Management: Waste Amendment Act, 2014 (Act 26 of 2014);
- » The South African Constitution (Act 108 of 1996);
- » Hazardous Substances Act (Act 5 of 1973);

- » Health Act (Act 63 of 1977);
- » Environment Conservation Act (Act 73 of 1989);
- » Occupational Health and Safety Act (Act 85 of 1993);
- » National Water Act (Act 36 of 1998);
- » The National Environmental Management Act (Act 107 of 1998) (as amended);
- » Municipal Structures Act (Act 117 of 1998);
- » Municipal Systems Act (Act 32 of 2000);
- » Mineral and Petroleum Resources Development Act (Act 28 of 2002); and
- » Air Quality Act (Act 39 of 2004).

Storage of waste must be conducted in accordance with the National Norms and Standards for the Storage of Waste, published in GNR 926.

4. WASTE MANAGEMENT PRINCIPLES

An integrated approach to waste management is needed on site. Such an approach is illustrated in **Figure 1**.

It is important to ensure that waste is managed with the following objectives in mind during all phases of the project:

- » Reducing volumes of waste is the greatest priority;
- » If reduction is not feasible, the maximum amount of waste is to be recycled; and
- » Waste that cannot be recycled is to be disposed of in the most environmentally responsible manner.

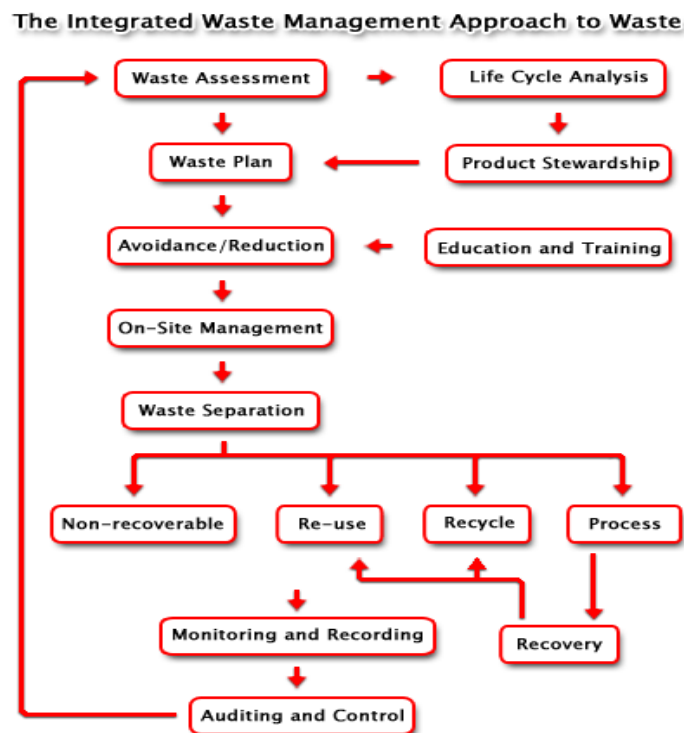


Figure 1: Integrated Waste Management Flow Diagram

(Source: <http://www.enviroserv.co.za/pages/content.asp?SectionId=496>)

4.1. Construction phase

A plan for the management of waste during the construction phase is detailed below. A Method Statement detailing specific waste management practices during construction should be prepared by the Contractor prior to the commencement of construction, for approval by the Resident Engineer.

4.1.1. Waste Assessment / Inventory

- » The Environmental Officer (EO), or designated staff member, must develop, implement and maintain a waste inventory reflecting all waste generated during construction for both general and hazardous waste streams.
- » Construction methods and materials should be carefully considered in view of waste reduction, re-use, and recycling opportunities, to be pro-actively implemented.
- » Once a waste inventory has been established, targets for the recovery of waste (minimisation, re-use, recycling) should be set.
- » The EO must conduct waste classification and rating in terms of SANS 10288 and Government Notice 634 published under the NEM: WA.

4.1.2. Waste collection, handling and storage

- » It is the responsibility of the EO to ensure that each subcontractor implements their own waste recycling system, i.e. separate bins for food waste, plastics, paper, wood, glass cardboard, metals, etc. Such practises must be made contractually binding upon appointment of the subcontractors.
- » Waste manifests and waste acceptance approvals (i.e. receipts) from designated waste facilities must be kept on file at the site office, in order to record and prove continual compliance for future auditing.
- » Septic tanks and portable toilets must be monitored by the EO or responsible subcontractor and maintained regularly. Below ground storage of septic tanks must withstand the external forces of the surrounding environment. The area above the tank must be demarcated to prevent any vehicles or heavy machinery from moving around in the surrounding area.
- » Waste collection bins and hazardous waste containers must be provided by the principal contractor and subcontractors and placed at strategic locations around the site for the storage of organic, recyclable and hazardous waste.
- » A dedicated waste area must be established on site for the storage of all waste streams before removal from site. The storage period must not trigger listed waste activities as per the NEMWA, GN 921 of November 2013.
- » Signage/ colour coding must be used to differentiate disposal areas for the various waste streams (i.e. paper, cardboard, metals, food waste, glass etc.).
- » Hazardous waste must be stored within a bunded area constructed according to SABS requirements, and must ensure complete containment of the spilled material in the event of a breach. As such, appropriate bunding material, design, capacity and type must be utilised to ensure that no contamination of the surrounding environment will occur despite a containment breach. The net capacity of a bunded compound in a storage facility should be at least 120% of the net capacity of the largest tank.
- » Take into consideration the capacity displaced by other tanks within the same bunded area and any foundations.

- » Treat interconnected tanks as a single tank of equivalent total volume for the purposes of the bund design criteria.
- » The location of all temporary waste storage areas must aim to minimise the potential for impact on the surrounding environment, including prevention of contaminated runoff, seepage, and vermin control, while being reasonably placed in terms of centrality and accessibility on site. Where required, an additional temporary waste storage area may be designated, provided identical controls are exercised for these locations.
- » Waste storage shall be in accordance with all Regulations and best-practice guidelines and under no circumstances may waste be burnt on site.
- » A dedicated waste management team must be appointed by the principal contractors' SHE Officer, who will be responsible for ensuring the continuous sorting of waste and maintenance of the area. The waste management team must be trained in all areas of waste management and monitored by the SHE Officer.
- » All waste removed from site must be done by a registered/ licensed subcontractor, who must supply information regarding how waste recycling/ disposal will be achieved. The registered subcontractor must provide waste manifests for all removals at least once a month or for every disposal made, records of which must be kept on file at the site camp for the duration of the construction period.

4.1.3. Management of waste storage areas

- » Waste storage must be undertaken in accordance with the relevant Norms and Standards.
- » The position of all waste storage areas must be located so as to ensure minimal degradation to the environment. The main waste storage area must have a suitable storm water system separating clean and contaminated storm water.
- » Collection bins placed around the site and at subcontractors' camps (if at a different location than the main site camp) must be maintained and emptied on a regular basis by the principal contractor to avoid overflowing receptacles.
- » Inspections and maintenance of the main waste storage area must be undertaken daily. Skips and storage containers must be clearly marked or colour coded and well-maintained. Monitor for rodents and take corrective action if they become a problem.
- » Waste must be stored in designated containers and not on the ground.
- » Inspections and maintenance of bunds must be undertaken regularly. Bunds must be inspected for leaks or cracks in the foundation and walls.
- » It is assumed that any rainwater collected inside the bund is contaminated and must be treated by oil/water separation (or similar method) prior to dewatering, or removed and stored as hazardous waste, and not released into the environment.
- » If any leaks occur in the bund, these must be amended immediately.
- » Bund systems must be designed to avoid dewatering of contaminated water, but to rather separate oil and hydrocarbons from water prior to dewatering.
- » Following rainfall event bunds must always be dewatered in order to maintain a sufficient storage capacity in the event of a breach.
- » No mixing of hazardous and general waste is allowed.

4.1.4. Disposal

- » Waste generated on site must be removed on a regular basis. This frequency may change during construction depending on waste volumes generated at different stages of the construction process,

however removal must occur prior to the storage capacity being reached to avoid overflow of containers and poor waste storage.

- » Waste must be removed by a suitably qualified contractor and disposed of at an appropriately licensed landfill site. Proof of appropriate disposal must be provided by the contractor to the EO and ECO.

4.1.5. Record keeping

The success of the WMP is determined by measuring criteria such as waste volumes, cost recovery from recycling and cost of disposal. Recorded data can indicate the effect of training and education, or the need for education. It will provide trends and benchmarks for setting goals and standards. It will provide clear evidence of the success or otherwise of the plan.

- » Documentation (waste manifest, certificate of issue or safe disposal) must be kept detailing the quantity, nature, and fate of any regulated waste for audit purposes.
- » Waste management must form part of the monthly reporting requirements in terms of volumes generated, types, storage and final disposal.

4.1.6. Training

Training and awareness regarding waste management shall be provided to all employees and contractors as part of the toolbox talks or on-site awareness sessions with the EO and at the frequency as set out by the ECO.

4.2. Operation phase

It is expected that the operation phase will result in the production of limited amounts of general waste consisting mostly of cardboard, paper, plastic, tins, metals and a variety of synthetic compounds. Hazardous wastes (including grease, oils) will also be generated. All waste generated will be required to be temporarily stored at the facility in appropriate sealed containers prior to disposal at a permitted landfill site or other facilities.

The following waste management principles apply during the operation phase:

- » The SHE Manager must develop, implement and maintain a waste inventory reflecting all waste generated during operation for both general and hazardous waste streams.
- » Adequate waste collection bins at site must be supplied. Separate bins should be provided for general and hazardous waste.
- » Recyclable waste must be removed from the waste stream and stored separately.
- » All waste must be stored in appropriate temporary storage containers (separated between different operation wastes, and contaminated or wet waste).
- » Waste storage shall be in accordance with all best-practice guidelines and under no circumstances may waste be burnt on site.
- » Waste generated on site must be removed on a regular basis throughout the operation phase.
- » Waste must be removed by a suitably qualified contractor and disposed of at an appropriately licensed landfill site. Proof of appropriate disposal must be provided by the contractor and kept on site.

5. Monitoring of Waste Management Activities

Records must be kept of the volumes/ mass of the different waste streams that are collected from the site throughout the life of the project. The appointed waste contractor is to provide monthly reports to the operator containing the following information:

- » Monthly volumes/ mass of the different waste streams collected;
- » Monthly volumes/ mass of the waste that is disposed of at a landfill site;
- » Monthly volumes/ mass of the waste that is recycled;
- » Data illustrating progress compared to previous months.

This report will aid in monitoring the progress and relevance of the waste management procedures that are in place. If it is found that the implemented procedures are not as effective as required, this WMP is to be reviewed and amended accordingly. This report must form part of the EO's reports to the ECO on a monthly basis.

PRINCIPLES FOR TRAFFIC MANAGEMENT

1. PURPOSE

The purpose of this Traffic Management Plan (TMP) is to address regulatory compliance, traffic management practices, and protection measures to help reduce impacts related to transportation and the construction of temporary and long-term access within the vicinity of the Kotulo Tsatsi Energy PV3 project site. The objectives of this plan include the following:

- » To ensure compliance with all legislation regulating traffic and transportation within South Africa (National, Provincial, Local & associated guidelines).
- » To avoid incidents and accidents while vehicles are being driven and while transporting personnel, materials, and equipment to and from the project site.
- » To raise greater safety awareness in each driver and to ensure the compliance of all safe driving provisions for all the vehicles.
- » To raise awareness to ensure drivers respect and follow traffic regulations.
- » To avoid the deterioration of access roads and the pollution that can be created due to noise and emissions produced by equipment, machinery, and vehicles.

2. TRAFFIC AND TRANSPORTATION MANAGEMENT PRINCIPLES

- » Prior to the commencement of construction, the contractor must develop their own detailed Transport Management Plan (TMP) based on traffic volumes and road carry capacity outlines in this plan
- » The transport contractor must ensure that all required permits for the transportation of abnormal loads are in place prior to the transportation of equipment and project components to the site. Specific abnormal load routes must be developed with environmental factors taken into consideration.
- » Before construction commences, authorised access routes must be clearly marked in the field with signs or flagging. The Construction Contractor must review the location of designated access and will be responsible for ensuring construction travel is limited to designated routes. The entrance of the main access road must not be constructed before a blind rise or on a bend of the public road.
- » All employees must attend an environmental training program (e.g. toolbox talks) by the Environmental Officer (EO). Through this program, employees will be instructed to use only approved access roads, drive within the delineated road limits, and obey jurisdictional and posted speed limits to minimise potential impacts to the environment and other road users.
- » The contractor will be responsible for making sure that their suppliers, vendors, and subcontractors strictly comply with the principles of this TMP and the contractor's TMP.
- » Adjacent landowners must be notified of the construction schedule.
- » Access roads and entrances to the site should be carefully planned to limit any intrusion on the neighbouring property owners and road users.
- » Signs must be posted in the project area to notify landowners and others of the construction activity.
- » Flagging must be provided at access points to the site and must be maintained until construction is completed on the site.

- » Speed limits must be established prior to commencement of construction and enforced over all construction traffic.
- » Speed controls and implementation of appropriate dust suppression measures must be enforced to minimise dust pollution.
- » Throughout construction the contractor will be responsible for monitoring the condition of roads used by project traffic and for ensuring that roads are maintained in a condition that is comparable to the condition they were in before the construction began.
- » Drivers must have an appropriate valid driver's license and other operation licences required by applicable legislation.
- » All vehicles must be maintained in good mechanical, electrical, and electronic condition, including but not limited to the brake systems, steering, tires, windshield wipers, side mirrors and rear view mirror, safety belts, signal indicators, and lenses.
- » Any traffic delays attributable to construction traffic must be co-ordinated with the appropriate authorities.
- » No deviation from approved transportation routes must be allowed, unless roads are closed for reasons outside the control of the contractor.
- » Impacts on local communities must be minimised. Consideration should be given to limiting construction vehicles travelling on public roadways during the morning and late afternoon commute time.

3. MONITORING

- » The principal contractor must ensure that all vehicles adhere to the speed limits.
- » A speeding register must be kept with details of the offending driver.
- » Repeat offenders must be penalised.
- » Where traffic signs are not being adhered to, engineering structures must be used to ensure speeds are reduced.

EMERGENCY PREPAREDNESS, RESPONSE AND FIRE MANAGEMENT PLAN

1. PURPOSE

The purpose of the Emergency Preparedness and Response Plan is:

- » To assist contractor personnel to prepare for and respond quickly and safely to emergency incidents, and to establish a state of readiness which will enable prompt and effective responses to possible events.
- » To control or limit any effect that an emergency or potential emergency may have on site or on neighbouring areas.
- » To facilitate emergency responses and to provide such assistance on the site as is appropriate to the occasion.
- » To ensure communication of all vital information as soon as possible.
- » To facilitate the reorganisation and reconstruction activities so that normal operations can be resumed.
- » To provide for training so that a high level of preparedness can be continually maintained.

This plan outlines response actions for potential incidents of any size. It details response procedures that will minimise potential health and safety hazards, environmental damage, and clean-up efforts. The plan has been prepared to ensure quick access to all the information required in responding to an emergency event. The plan will enable an effective, comprehensive response to prevent injury or damage to the construction personnel, public, and environment during the project. Contractors are expected to comply with all procedures described in this document. A Method Statement should be prepared at the commencement of the construction phase detailing how this plan is to be implemented as well as details of relevant responsible parties for the implementation. The method statement must also reflect conditions of the IFC Performance Standard 1 and include the following:

- » Identification of areas where accidents and emergency situations may occur;
- » Communities and individuals that may be impacted;
- » Response procedure;
- » Provisions of equipment and resources;
- » Designation of responsibilities;
- » Communication; and
- » Periodic training to ensure effective response to potentially affected communities.

2. PROJECT-SPECIFIC DETAILS

The project site has been identified by the applicant as a technically feasible site which has the potential for the development of a solar PV facility, including a Battery Energy Storage System (BESS), and associated infrastructure. During the Scoping Phase, the full extent of the project site (i.e., approximately 4954ha) was considered, within which the development area for the project (approximately 1888ha) was appropriately located from a technical perspective. The purpose of assessing the full extent of the development area during the Scoping Phase was to determine the suitability from an environmental and social perspective and identify areas that should be avoided in development planning. Based on the existing information, areas of environmental sensitivity were identified within the development area. In order to avoid these areas of potential sensitivity identified during the Scoping Phase and to ensure that potential detrimental

environmental impacts are minimised as far as possible, the developer identified a suitable development footprint (approximately 1350ha in extent) within the larger development area and planned the PV infrastructure for Kotulo Tsatsi Energy PV3 to be located within this area (that is the project development footprint, approximately 1350ha in extent). Since the development area is larger than the area required for the development footprint, it provides the opportunity for the optimal placement of the infrastructure, ensuring avoidance of major identified environmental sensitives.

The Kotulo Tsatsi Energy PV3 facility will have a contracted capacity of up to 480MW. Infrastructure associated with the solar PV facility will include:

- » Solar PV array comprising PV modules and mounting structures.
- » Inverters and transformers.
- » Cabling between the project components.
- » Access roads, internal distribution roads and fencing around the development area.
- » Substation and BESS hubs, including:
 - Battery Energy Storage System (BESS)
 - On-site facility substations, switching substations
- » 132kV power line within a 300m wide corridor to facilitate the connection between the PV Facility and the authorised 400kV collector substation.
- » O&M and laydown area hub, including:
 - Site offices and maintenance buildings, including workshop areas for maintenance and storage.
 - Laydown areas and temporary construction camp area.

Due to the scale and nature of this development, it is anticipated that the following risks could potentially arise during the construction and operation phases:

- » Fires;
- » Leakage of hazardous substances;
- » Storage of flammable materials and substances;
- » Flood events;
- » Accidents; and
- » Natural disasters.

3. EMERGENCY RESPONSE PLAN

There are three levels of emergency as follows:

- » Local Emergency: An alert confined to a specific locality.
- » Site Emergency: An alert that cannot be localised and which presents danger to other areas within the site boundary or outside the site boundary.
- » Evacuation: An alert when all personnel are required to leave the affected area and assemble in a safe location.

If there is any doubt as to whether any hazardous situation constitutes an emergency, then it must be treated as an Evacuation.

Every effort must be made to control, reduce or stop the cause of any emergency provided it is safe to do so. For example, in the event of a fire, isolate the fuel supply and limit the propagation of the fire by cooling

the adjacent areas. Then confine and extinguish the fire (where appropriate) making sure that re-ignition cannot occur.

3.1. Emergency Scenario Contingency Planning

3.1.1. Scenario: Spill which would result in the contamination of land, surface or groundwater

i. Spill Prevention Measures

Preventing spills must be the top priority at all operations which have the potential of endangering the environment. The responsibility to effectively prevent and mitigate any scenario lies with the Contractor and the ECO. In order to reduce the risk of spills and associated contamination, the following principles should be considered during construction and operation activities:

- » All equipment refuelling, servicing and maintenance activities should only be undertaken within appropriately sealed/contained or bunded designated areas.
- » All maintenance materials, oils, grease, lubricants, etc. should be stored in a designated area in an appropriate storage container.
- » No refuelling, storage, servicing, or maintenance of equipment should take place within sensitive environmental resources in order to reduce the risk of contamination by spills.
- » No refuelling or servicing should be undertaken without absorbent material or drip pans properly placed to contain spilled fuel.
- » Any fluids drained from the machinery during servicing should be collected in leak-proof containers and taken to an appropriate disposal or recycling facility.
- » If these activities result in damage or accumulation of product on the soil, the contaminated soil must be disposed of as hazardous waste. Under no circumstances shall contaminated soil be added to a spoils pile and transported to a regular disposal site.
- » Chemical toilets used during construction must be regularly cleaned. Chemicals used in toilets are also hazardous to the environment and must be controlled. Portable chemical toilets could overflow if not pumped regularly or they could spill if dropped or overturned during moving. Care and due diligence should be taken at all times.
- » Contact details of emergency services and HazMat Response Contractors are to be clearly displayed on the site. All staff are to be made aware of these details and must be familiar with the procedures for notification in the event of an emergency.

ii. Procedures

The following action plan is proposed in the event of a spill:

1. Spill or release identified.
2. Assess person safety, safety of others and environment.
3. Stop the spill if safely possible.
4. Contain the spill to limit entering surrounding areas.
5. Identify the substance spilled.
6. Quantify the spill (under or over guideline/threshold levels).
7. Notify the Site Manager and emergency response crew and authorities (in the event of major spill).
8. Inform users (and downstream users) of the potential risk.

9. Clean up of the spill using spill kit or by HazMat team.
10. Record of the spill incident on company database.

a) Procedures for containing and controlling the spill (i.e. on land or in water)

Measures can be taken to prepare for quick and effective containment of any potential spills. Each contractor must keep sufficient supplies of spill containment equipment at the construction sites, at all times during and after the construction phase. These should include specialised spill kits or spill containment equipment. Other spill containment measures include using drip pans underneath vehicles and equipment every time refuelling, servicing, or maintenance activities are undertaken.

Specific spill containment methods for land and water contamination are outlined below.

Containment of Spills on Land

Spills on land include spills on rock, gravel, soil and/or vegetation. It is important to note that soil is a natural sorbent, and therefore spills on soil are generally less serious than spills on water as contaminated soil can be more easily recovered. It is important that all measures be undertaken to avoid spills reaching open water bodies located outside of the project site. The following methods could be used:

- » *Dykes* - Dykes can be created using soil surrounding a spill on land. These dykes are constructed around the perimeter or down slope of the spilled substance. A dyke needs to be built up to a size that will ensure containment of the maximum quantity of contaminant that may reach it. A plastic tarp can be placed on and at the base of the dyke such that the contaminant can pool up and subsequently be removed with sorbent materials or by pump into barrels or bags. If the spill is migrating very slowly, a dyke may not be necessary and sorbents can be used to soak up contaminants before they migrate away from the source of the spill.
- » *Trenches* - Trenches can be dug out to contain spills. Spades, pick axes or a front-end loader can be used depending on the size of the trench required. Spilled substances can then be recovered using a pump or sorbent materials.

b) Procedures for transferring, storing, and managing spill related wastes

Used sorbent materials are to be placed in plastic bags for future disposal. All materials mentioned in this section are to be available in the spill kits. Following clean up, any tools or equipment used must be properly washed and decontaminated, or replaced if this is not possible.

Spilled substances and materials used for containment must be placed into empty waste oil containers and sealed for proper disposal at an approved disposal facility.

c) Procedures for restoring affected areas

Criteria that may be considered include natural biodegradation of oil, replacement of soil and revegetation. Once a spill of reportable size has been contained, the ECO and the relevant Authority must be consulted to confirm that the appropriate clean up levels are met.

3.1.2. Scenario: Fire (and fire water handling)

i. Action Plan

The following action plan is proposed in the event of a fire:

1. Quantify risk.
2. Assess person safety, safety of others and environment.
3. If safe – attempt to extinguish the fire using appropriate equipment.
4. If not safe to extinguish, contain fire.
5. Notify the Site Manager and emergency response crew and authorities.
6. Inform users of the potential risk of fire.
7. Record the incident on the company database or filing register.

ii. Procedures

Because large scale fires may spread very fast it is most advisable that the employee/contractor not put his/her life in danger in the case of an uncontrolled fire.

Portable firefighting equipment must be provided at strategic locations throughout the site, in line with the Building Code of South Africa and the relevant provincial building code. All emergency equipment including portable fire extinguishers, hose reels and hydrants must be maintained and inspected by a qualified contractor in accordance with the relevant legislation and national standards.

Current evacuation signs and diagrams for the building or site that are compliant to relevant state legislation must be provided in a conspicuous position, on each evacuation route. Contact details for the relevant emergency services should be clearly displayed on site and all employees should be aware of procedures to follow in the case of an emergency.

a) Procedures for initial actions

Persons should not fight the fire if any of the following conditions exist:

- » They have not been trained or instructed in the use of a fire extinguisher.
- » They do not know what is burning.
- » The fire is spreading rapidly.
- » They do not have the proper equipment.
- » They cannot do so without a means of escape.
- » They may inhale toxic smoke.

b) Reporting procedures

In terms of the requirements of NEMA, the responsible person must, within 14 days of the incident, report to the Director General, provincial head of department and municipality.

- » Report fire immediately to the site manager, who will determine if it is to be reported to the relevant emergency services and authorities.
- » The site manager must have copies of the Report form to be completed.

SUMMARY: RESPONSE PROCEDURE

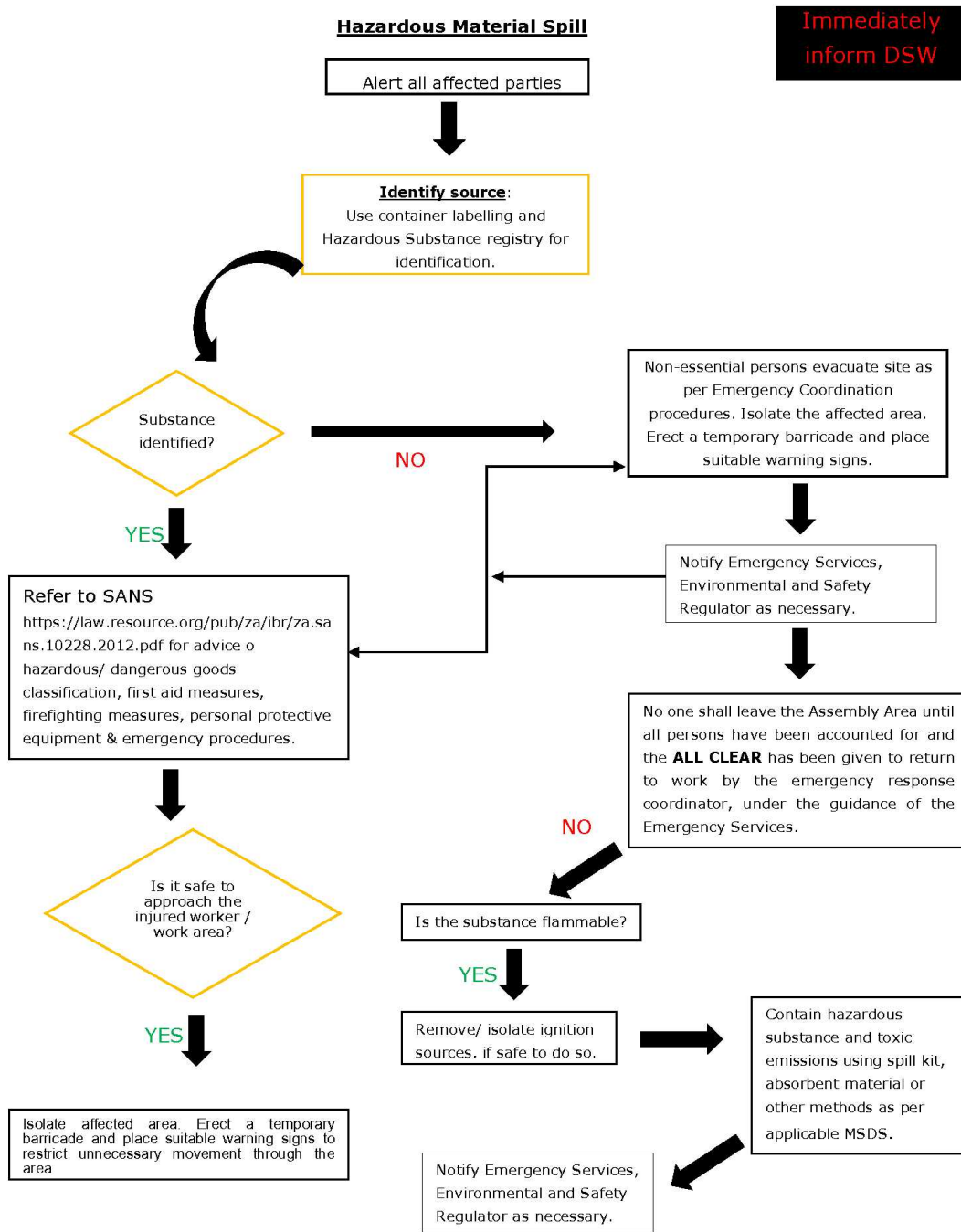


Figure 1: Hazardous Material Spill

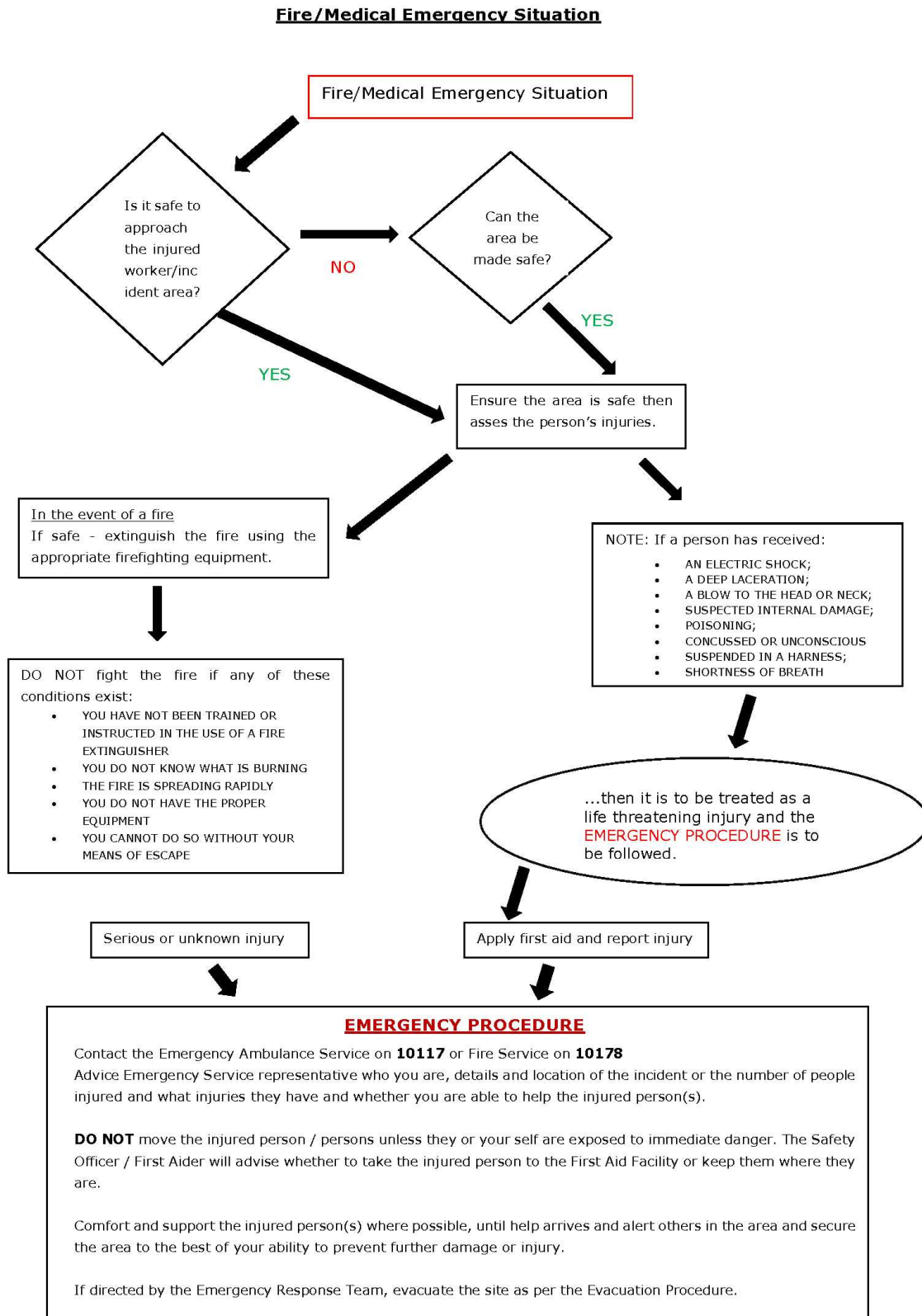


Figure 2: Emergency Fire/Medical

4. PROCEDURE RESPONSIBILITY

The Contractor's Safety, Health and Environment (SHE) Representative, employed by the Contractor, is responsible for managing the day-to-day on-site implementation of this Plan, and for the compilation of regular (usually weekly) Monitoring Reports. In addition, the SHE must act as liaison and advisor on all environmental and related issues.

The local authorities will provide their assistance when deemed necessary, or when it has been requested and/or indicated in Section 30 (8) of NEMA. The provincial authority will provide assistance and guidance where required and conduct awareness programmes.

CHANCE FIND PROTOCOL – HERITAGE RESOURCES

1. PURPOSE

Potential impacts on heritage resources can occur during construction as a result of unearthing during construction. This protocol outlines the procedures to be followed in the event that a heritage resource is uncovered.

Palaeontological finds

Monitoring Programme for Palaeontology is to commence once the excavations for all structures and infrastructure begin. The following procedure is only required if fossils are seen on the surface and when excavations commence.

1. When excavations begin the rocks must be given a cursory inspection by the environmental officer or designated person. Any fossiliferous material (silicified wood, plants, insects, bone, shells) should be put aside in a suitably protected place. This way the construction activities will not be interrupted.
2. Where possible, photographs of similar fossils must be provided to the contractor to assist in recognizing the fossil plants and bones that might be encountered on site. This information must be built into the EMPr's training and awareness plan and procedures.
3. Photographs of the putative fossils can be sent to the palaeontologist for a preliminary assessment.
4. If there is any possible fossil material found by the Contractor/environmental officer, then a qualified palaeontologist should visit the site to inspect the selected material and check the excavations where feasible.
5. Fossil plants or vertebrates that are considered to be of good quality or scientific interest by the palaeontologist must be removed, catalogued and housed in a suitable institution where they can be made available for further study. Before the fossils are removed from the site, a South African Heritage Resources Agency (SAHRA) permit must be obtained. Annual reports must be submitted to SAHRA as required by the relevant permits.
6. If no good fossil material is recovered, then any site inspections by the palaeontologist will not be necessary.
7. If no fossils are found and the excavations have finished, then no further monitoring is required.

Archaeological finds

If you believe that you may have encountered any archaeological materials, stop work in the area and follow the procedure below:

1. The heritage resource must be avoided and all activities in the immediate vicinity temporarily ceased.
2. A suitably qualified specialist must be informed and commissioned to consider the heritage resource, either via communicating with the Environmental Officer via telephone or email, or based on a site visit.
3. Appropriate measures are to be provided by a qualified specialist towards immediate management of the heritage resource.

4. Should the specialist conclude that the find is a heritage resource protected in terms of the NRHA (1999) Sections 34, 36, 37 and NHRA (1999) Regulations (Regulation 38, 39, 40), the specialist must notify SAHRA on behalf of the Developer.
5. If required by SAHRA, the specialist must conduct a HIA in terms of NHRA Section 38 that must include rescue actions/excavations.

Graves

Should any unmarked human burials/remains be found during the course of construction:

1. Work in the immediate vicinity should cease and the find must immediately be reported to the archaeologist, or the South African Heritage Resources Agency (SAHRA).
2. Where human remains are part of a burial they would need to be exhumed under a permit from SAHRA (for pre-colonial burials as well as burials later than about AD 1500).
3. For newer graves, should the specialist conclude that the find is a heritage resource protected in terms of the NHRA (1999) Section 35 and NHRA (1999) Regulations (Regulation 38, 39, 40) SAHRA may require that an identification of interested parties, consultation and /or grave relocation take place;
4. Consultation must take place in terms of NHRA (1999) Regulations 39, 40, 42;
5. Grave relocation must take place in terms of NHRA (1999) Regulations 34.
6. These measure should be undertaken by a qualified archaeologist, and in accordance with relevant legislation, permitting, statutory permissions and subject to any local and regional provisions, laws and by-laws pertaining to human remains.
7. If required by current, relevant legislation, a full social consultation process should occur in conjunction with the mitigation of cemeteries and burials.
8. Under no circumstances may burials be disturbed or removed until such time as necessary statutory procedures required for grave relocation have been met.

CURRICULUM VITAE OF KAREN JODAS

| | |
|-------------------------------|--|
| Profession: | Environmental Management and Compliance Consultant; Environmental Assessment Practitioner. Professional Natural Scientist: Environmental Science since 1999. |
| Specialisation: | Strategic environmental assessment and advice; development of plans and guidelines; environmental compliance advise and monitoring; Environmental Impact Assessment; environmental management; project management and co-ordination of environmental projects; peer review; policy, strategy and guideline formulation; renewable energy projects; water resources management. |
| Years work experience: | 25 years (in the field since 1997) |

VOCATIONAL EXPERIENCE

Provide technical input for projects in the environmental management field, specialising in strategic evaluation, Environmental Impact Assessment studies, environmental management plans, programmes and guidelines, integrated environmental management, environmental compliance monitoring; peer review of EIA reports and processes, strategy and guideline development, and public participation. Key focus on overall Project Management, integration of environmental studies and environmental processes into larger engineering-based projects, strategic assessment, and the identification of environmental management solutions and mitigation/risk minimising measures.

Excellent working knowledge of environmental legislation, strategies, guidelines and policies. Compilation of the reports for environmental studies are in accordance with the all relevant environmental legislation under the National Environmental Management Act. Due consideration of Equator Principles and compliance with IFC performance standards is now a part of all projects.

SKILLS BASE AND CORE COMPETENCIES

Provide technical input for projects in the environmental management field, specialising in strategic evaluation, Environmental Impact Assessment studies, environmental management plans, programmes and guidelines, integrated environmental management, environmental compliance monitoring; peer review of EIA reports and processes, strategy and guideline development, and public participation. Key focus on overall Project Management, integration of environmental studies and environmental processes into larger engineering-based projects, strategic assessment, and the identification of environmental management solutions and mitigation/risk minimising measures.

Excellent working knowledge of environmental legislation, strategies, guidelines and policies. Compilation of the reports for environmental studies are in accordance with the all relevant environmental legislation under the National Environmental Management Act. Due consideration of Equator Principles and compliance with IFC performance standards is now a part of all projects.

SKILLS BASE AND CORE COMPETENCIES

- Twenty five years (25) of experience in the environmental management, environmental permitting, impact assessment and compliance fields
- Twenty three (23) years of experience in Project Management of large environmental assessment and environmental management projects
- Strategic and compliance advise for all aspects of environmental assessment and management

- Wide range of experience for public and private sector projects
- Key experience in the assessment of impacts associated with renewable energy projects
- Experienced in assessments for both linear developments and nodal developments
- Experienced consultant in projects in Sub-Saharan Africa
- Experienced in environmental compliance advice, monitoring and reporting for construction and operation projects
- Due diligence auditing and reporting
- External and peer review of environmental assessment and compliance reporting as well as EIA processes
- Working knowledge of environmental planning policies, regulatory frameworks and legislation
- Input and review of Environmental Management Plans and Programmes, including Invasive Species Monitoring, Control and Eradication Plans
- Identification and assessment of potential environmental impacts and benefits
- Development of practical and achievable mitigation measures and management plans and evaluation of risk to project execution
- Compilation and review of the reports in accordance with all relevant environmental legislation
- Public participation/involvement and stakeholder consultation
- Environmental strategy, policy and guidelines development.

EDUCATION AND PROFESSIONAL STATUS

Degrees:

- B.Sc Earth Sciences, majoring in Geography and Zoology, Rhodes University, Grahamstown, 1993
- B.Sc Honours in Geography (in Environmental Water Management), Rhodes University, Grahamstown, 1994. Major subjects included Water Resources Management, Streams Ecology, Fluvial Geomorphology and Geographic Information Systems.
- M.Sc in Geography (Geomorphology), Rhodes University, Grahamstown, 1996

Short Courses:

- Environmental and Social Risk Management (ESRM), International Finance Corporation, 2018
- Integrated Water Resource Management, the National Water Act, and Water Use Authorisations, CSBSS, 2017
- WindFarmer Wind Farm Design course, Garrad Hassan, 2009
- Environmental Law Course, Aldo Leopold Institute, 2002
- Water Quality Management, Potchefstroom University, 1998

Professional Society Affiliations:

- Registered EAP with the Environmental Assessment Practitioners Association of South Africa (EAPASA) (2022/5499)
- Registered with the South African Council for Natural Scientific Professions as a Professional Natural Scientist: Environmental Science (400106/99)
- Registered with the International Associated for Impact Assessment South Africa (IAIAsa): 5888

Other Relevant Skills:

- Xtrack Extreme – Advanced Off-Road Driving Course

EMPLOYMENT

| Date | Company | Roles and Responsibilities |
|-----------------|----------------------------------|--|
| 2006 - Current: | Savannah Environmental (Pty) Ltd | Director <i>Independent specialist environmental consultant, Environmental Assessment Practitioner (EAP) and advisor</i> <u>Tasks include:</u> <ul style="list-style-type: none"> • Project management. |

| Date | Company | Roles and Responsibilities |
|--------------|---|---|
| | | <ul style="list-style-type: none"> • Environmental screening assessments, environmental permitting and environmental authorisation applications. • Due Diligence reporting • Water use authorisation applications on the e-WULAA system. • EA amendment applications. • Environmental compliance audits. • Efficient and quality reporting in line with the requirements of the National Environmental Management Act, EIA Regulations, and other relevant environmental legislation. • Execution of the public participation process. • Professional client liaison. |
| 1997 – 2005: | Bohlweki Environmental (Pty) Ltd (later known as Royal Haskoning DHV; or RHDHV) | Associate Environmental Management Unit: Manager; Principle Environmental Scientist focussing on Environmental Management and Project Management |

PROJECT EXPERIENCE

Proven track record of successfully consulting on a range of development projects in all nine Provinces of South Africa, as well as in neighbouring southern African countries.

Her experience includes projects in the energy generation and transmission sector, as well as wastewater treatment facilities, mining and prospecting activities, property development, national roads, as well as strategy and guidelines development.

Karen Jodas has played a significant role in the energy sector since 2007, specifically in the roll-out of renewable energy projects throughout southern Africa. She has provided consulting services to over 400 renewable and baseload energy applications submitted by Independent Power Producers (IPPs) to the Department of Forestry, Fisheries and the Environment in South Africa for authorisation, as well as to Eskom on their renewable energy and gas-to-energy projects. In addition, she has concluded the environmental permitting and/or due diligence auditing for the development and implementation of 42 projects selected as preferred bidders by the Department of Energy under the Renewable Energy Independent Power Producers Procurement (REIPPP) Programme (small- and large-scale projects).

GRID INFRASTRUCTURE PROJECTS

Environmental Impact Assessments and Environmental Management Programmes

| Project Name & Location | Client Name | Role |
|--|--------------------|-----------------------|
| Kyalami/Midrand Substation and 3 Transmission Lines, Gauteng | Eskom Transmission | Project Manager & EAP |
| Steelpoort Integration Project, Limpopo | Eskom Transmission | Project Manager & EAP |

Basic Assessments

| Project Name & Location | Client Name | Role |
|---|---|-----------------------|
| Amakhala Emoyeni Power Line & Kopleegte Substation, Eastern Cape | Cennergi | Project Manager & EAP |
| Bon Espirange Substation & Overhead Power Line for the Roggeveld Wind Farm, Northern Cape | Building Energy (G7 Renewable Energies) | Project Manager & EAP |
| Castle WEF Powerline, Northern Cape | Juwi Renewable Energies | Project Manager & EAP |
| Cuprum-Burchell; Burchell-Mooidraai Power Line, Northern Cape | Eskom | Project Manager & EAP |

| | | |
|--|--|-----------------------|
| Expansion of the Komsberg Main Transmission Substation, Northern Cape | Enel Green Power | Project Manager & EAP |
| Garob-Kronos Power Line, Northern Cape | Juwi Renewable Energies | Project Manager & EAP |
| Golden Valley Dx-Poseidon Power Line Substation & Golden Valley-Kopleegte Power Line, Eastern Cape | BioTherm Energy | Project Manager & EAP |
| Gunstfontein Switching Station, Power Line & Ancillary Infrastructure, Northern Cape | African Clean Energy Developments (ACED) | Project Manager & EAP |
| Ilanga Lethemba-Hydra, Northern Cape | Solar Capital | Project Manager & EAP |
| Iziduli Emoyeni WEF on-site substation, Power Line & Switching station, Access Roads & Watercourse Crossings, Eastern Cape | Windlab | Project Manager & EAP |
| Khai-Ma WEF Power Line, Northern Cape | Mainstream Renewable | Project Manager & EAP |
| Korana WEF Power Line, Northern Cape | Mainstream Renewable | Project Manager & EAP |
| Korana SEF Power Line, Northern Cape | Mainstream Renewable | Project Manager & EAP |
| Nobelsfontein WEF Power Line & Substation, Northern Cape | Coria / SARGE | Project Manager & EAP |
| Nojoli WEF Substation & Power Line Grid Connection, Eastern Cape | African Clean Energy Developments (ACED) | Project Manager & EAP |
| Olifantshoek Substation & Powerline, Northern Cape | Eskom Holdings | Project Manager & EAP |
| Poortjies WEF Power Line, Northern Cape | Mainstream Renewable | Project Manager & EAP |
| Power Line & Substation for the Blackwood WEF, Northern Cape | VentuSA Energy | Project Manager & EAP |
| Power Line & Substation for the Khobab WEF in Loeriesfontein, Northern Cape | Mainstream Renewable | Project Manager & EAP |
| Power Line Connecting the Sishen SEF to the Ferrum MTS-UMTU Klip Kop Power Line, Northern Cape | Acciona (Windfall 59 Properties) | Project Manager & EAP |
| Power Line for the Grid Connection of the 2 SEF's near Kath and Dibeng, Northern Cape | VentuSA Energy | Project Manager & EAP |
| Power Line for the Rhebokfontein WEF, Western Cape | Moyeng Energy | Project Manager & EAP |
| Power Line from Aggeney's Solar One to Aggeney's MTS Substation, Northern Cape | BlueWave | Project Manager & EAP |
| Re-alignment of 3 Eskom Power Line Servitudes within the Hopefield WEF, Western Cape | Umoya Energy | Project Manager & EAP |
| Re-alignment of the Power Line & Watercourse Crossings for the Loeriesfontein 2 WEF, Northern Cape | Mainstream Renewable | Project Manager & EAP |
| Re-alignment of the Power Line from Loeriesfontein 1 WEF to the Helios Substation, Northern Cape | Mainstream Renewable | Project Manager & EAP |
| Re-alignment of the Power Line from Loeriesfontein 3 WEF to the Helios Substation, Northern Cape | Mainstream Renewable | Project Manager & EAP |
| Substation for the Aggeney's PV SEF, Northern Cape | BioTherm Energy | Project Manager & EAP |
| Substation, Power Line & Watercourse Crossings for the Springfontein WEF, Free State | Mainstream Renewable | Project Manager & EAP |
| Wesley-Peddie (Riverbank Phase 2) Power Line for the Uncedo Lwethu WEF, Eastern Cape | Just Energy | Project Manager & EAP |

Environmental Compliance, Auditing and ECO

| Project Name & Location | Client Name | Role |
|---|--|-----------------|
| EO for the construction of the Neptune-Vuyani Transmission Line, Western Cape | Trans-Africa Projects on behalf of Eskom | Project Manager |

RENEWABLE POWER GENERATION PROJECTS: PHOTOVOLTAIC SOLAR ENERGY FACILITIES

Environmental Impact Assessments and Environmental Management Programmes

| Project Name & Location | Client Name | Role |
|---|---|----------------------------------|
| Aggeney's PV Plant, Northern Cape | Solar Capital | Project Manager & EAP |
| Blackwood PV SEF, Free State | VentuSA Energy | Project Manager & EAP |
| Bloemsmond PV 1 & PV 2 SEF's, Northern Cape | Atlantic Energy Partners | Project Manager & EAP |
| Bosjesmansberg PV SEF, Northern Cape | Networx | Project Manager & EAP |
| Boundary PV SEF, Northern Cape | VentuSA Energy | Project Manager & EAP |
| Buffels PV 1 & PV 2 SEF's, North West | Kabi Energy | Project Manager & EAP |
| De Aar PV SEF, Northern Cape | African Clean Energy Developments (ACED) | Project Manager & EAP |
| De Aar PV Solar Energy Plant, Northern Cape | Solar Capital | Project Manager & EAP |
| Gihon & Kison PV SEF's, Limpopo | Networx | Project Manager & EAP |
| Gunstfontein PV SEF, Northern Cape | Networx / Prana Energy | Project Manager & EAP |
| Harmony Eland, Nyala & Tshepong PV SEF's, Free State | BEEEntropie Renewable Innovation | Project Manager & EAP |
| Hibernia SEF, North West | EA Energy | Project Manager & EAP |
| Iziko PV SEF, Mpumalanga | VentuSA Energy | Project Manager & EAP |
| Kabi Kimberley PV Facility at DeBeers, Northern Cape | Kabi Solar | Project Manager & EAP |
| Karoo Renewables PV SEF, Northern Cape | SARGE | Project Manager & EAP |
| Kheis Phase 1, 2 & 3 PV SEF, Northern Cape | GeStamp Solar | Project Manager & EAP |
| Klipgat PV SEF, Northern Cape | Terra Solar | Project Manager & EAP |
| Loeriesfontein/Helios PV SEF, Northern Cape | Solar Capital | Project Manager & EAP |
| Naauwpoort PV SEF, Northern Cape | Terra Solar | Project Manager & EAP |
| Orkney PV SEF, North West | Genesis Eco-Energy | Project Manager & EAP |
| Pofadder SEF, Northern Cape | Mainstream Renewable | Project Manager & EAP |
| Prieska North PV SEF, Northern Cape | VentuSA Energy | Project Manager & EAP |
| Prieska PV SEF, Northern Cape | VentuSA Energy | Project Manager & EAP |
| Ritchie PV SEF, Northern Cape | Solar Capital | Project Manager & EAP |
| San Solar PV SEF, Northern Cape | VentuSA Energy | Project Manager & EAP |
| Sirius (Tungston Lodge) PV Solar Plants (x2, Northern Cape) | Aurora Power Solutions | Project Manager & EAP |
| Sol Invictus x4 PV Developments, Northern Cape | Building Energy | Project Manager & EAP |
| Solar Plant at Kathu (Wincanton), Northern Cape | REISA | Project Manager & EAP |
| Solar Plant at Sishen (Wincanton), Northern Cape | VentuSA Energy | Project Manager & EAP |
| <i>Solar Plant at Sishen (Wincanton), Northern Cape</i> | <i>VentuSA Energy</i> | <i>Project Manager & EAP</i> |
| <i>SolarReserve Kotulo Tsatsi PV1 SEF, Northern Cape</i> | <i>Kotulo Tsatsi Energy and SolarReserve South Africa</i> | <i>Project Manager & EAP</i> |
| SolarReserve Kotulo Tsatsi PV2 Facility, Northern Cape province | <i>Kotulo Tsatsi Energy and SolarReserve South Africa</i> | Project Manager & EAP |
| Stormberg Solar PV SEF, Eastern Cape | Networx / Prana Energy | Project Manager & EAP |
| Tewa Isitha (Grootdrink/Albany) PV SEF, Northern Cape | Africoast Engineers | Project Manager & EAP |
| Tiger Kloof PV SEF near Vryburg, North West | Kabi Energy | Project Manager & EAP |
| Tiger Solar PV SEF, Northern Cape | Kabi Energy | Project Manager & EAP |
| Vaalkop and Witkop PV SEF's, North West | Kabi Solar | Project Manager & EAP |
| Wagnbrietjiespan PV SEF, Free State | VentuSA | Project Manager & EAP |

| Project Name & Location | Client Name | Role |
|--|-------------------------------------|-----------------------|
| Wolmaransstad Municipality PV SEF, North West | BlueWave | Project Manager & EAP |
| Woodhouse PV 1 & PV 2 SEFs, North West | Genesis Eco-Energy | Project Manager & EAP |
| Zuurwater PV SEFs (x4), Northern Cape | Solafrica / BlueWave | Project Manager & EAP |
| Lichtenburg 1, 2 & 3 PV Facilities, North West | Atlantic Energy Partners & ABO Wind | Project Manager & EAP |
| Allepad PV One, Two, Three and Four PV SEFs | ILEnergy Development | Project Manager & EAP |

Basic Assessments

| Project Name & Location | Client Name | Role |
|--|--|-----------------------|
| Amandla Welanga & Dida PV SEFs near Noupoot, Northern Cape | Terra Solar | Project Manager & EAP |
| Carolusberg PV SEF, Northern Cape | Ilio Energy (SARGE) | Project Manager & EAP |
| Gosforth Park and Kynoch Rooftop PV SEF's Northern Cape | Building Energy | Project Manager & EAP |
| Hennenman PV SEF, Free State | BlueWave | Project Manager & EAP |
| Hibernia PV SEF near Lichtenburg, North West | EA Energy | Project Manager & EAP |
| Inkulukelo PV SEF, Northern Cape | Terra Solar | Project Manager & EAP |
| Kabi Kimberley PV SEF, Northern Cape | Kabi Energy | Project Manager & EAP |
| Kokerboom & Boabab PV Solar Energy Plants, Northern Cape | Brax Energy | Project Manager & EAP |
| Middelburg PV SEF, Mpumalanga | African Clean Energy Developments (ACED) | Project Manager & EAP |
| Nigramoep PV Solar Energy Plant, Northern Cape | SARGE | Project Manager & EAP |
| Noupoot (Kleinfontein and Toitdale) CPV, Northern Cape | Terra Power | Project Manager & EAP |
| O'Kiep 1 PV Solar Energy Plant, Northern Cape | Ilio Energy (SARGE) | Project Manager & EAP |
| O'Kiep 2 PV Solar Energy Plant, Northern Cape | BluePort Trade 118 (SARGE) | Project Manager & EAP |
| O'Kiep 3 PV Solar Energy Plant, Northern Cape | Ilio Energy (SARGE) | Project Manager & EAP |
| Rodicon PV SEF, Mpumalanga | VentuSA Energy | |
| Slurry PV SEF, North West | PPC | Project Manager & EAP |
| Small projects for PV SEF's, North West | BlueWave | Project Manager & EAP |
| Son Citrus Rooftop PV Installation, Eastern Cape | Building Energy | Project Manager & EAP |
| Tollie PV SEF, Northern Cape | Terra Solar | Project Manager & EAP |
| x2 Southern Farms PV Solar Energy Plants, Northern Cape | Southern Farms | Project Manager & EAP |
| Moeding Solar PV Facility (BA in terms of REDZ regs), North West | Kabi Energy | Project Manager & EAP |

Screening Studies

| Project Name & Location | Client Name | Role |
|---|--|-----------------------|
| Allemans, Wonderheuwel, Damfontein & Dida PV SEF's, Northern Cape | Terra Solar | Project Manager & EAP |
| Amandla Welang, Gillmer & Inkululeko PV SEF's, Northern Cape | GeoSolar/ TerraSolar | Project Manager & EAP |
| Blouputs PV, Onseepkans PV, Hoogelegen PV & Boegoeberg PV projects, Northern Cape | Engineering Development Industrial Projects (EDIP) | Project Manager & EAP |
| Bobididi PV SEF, Limpopo | Root 60Four Energy | Project Manager & EAP |
| Boshof-Les Marais / Buitenfontein SEF, Free State | Bluewave Capital | Project Manager & EAP |
| Bosjesmansberg PV SEF, Northern Cape | Networx | Project Manager & EAP |

| Project Name & Location | Client Name | Role |
|--|--|-----------------------|
| Class 2 & Class 3 Road Networks in the vicinity of the proposed Tambo Springs Freight Hub, Gauteng | SMEC South Africa (on behalf of Gauteng Department of Roads & Transport) | Project Manager & EAP |
| Hibernia SEF, North West | EA Energy | Project Manager & EAP |
| Lephalale PV SEF, Limpopo | Exxaro | Project Manager & EAP |
| Prieska PV SEF, Northern Cape | Terra Solar | Project Manager & EAP |
| Solar Project near Vryburg, North West province | ABO Wind | Project Manager & EAP |
| PV SEF's (x15) for the projects for the REIPP small scale BID, Nationwide | Building Energy | Project Manager & EAP |
| Senekal 1 & 2, Pongola & Newcastle PV SEF's, Kwa-Zulu-Natal | Building Energy | Project Manager & EAP |
| Small scale PV SEF project - 2nd Stage One | Bluewave Capital | Project Manager & EAP |
| Small scale PV SEF project - 2nd Stage One | Building Energy | Project Manager & EAP |
| Stella Helpmekaar SEF, North West | Bluewave Capital | Project Manager & EAP |
| Wolmaransstad Municipality SEF, North West | Bluewave Capital | Project Manager & EAP |
| Solar Project near Beaufort West, Western Cape | ABO Wind | Project Manager & EAP |
| Solar Project near Lichtenburg, Western Cape | ABO Wind | Project Manager & EAP |
| Solar Project near Hotazel, Western Cape | ABO Wind | Project Manager & EAP |
| Small-scale solar PV development site in Ekurhuleni Metropolitan Municipality, Gauteng | Genesis Eco-Energy Developments | Project Manager & EAP |

Environmental Compliance, Auditing and ECO

| Project Name & Location | Client Name | Role |
|--|-------------------------|-----------------|
| ECO for the Contraction of the De Aar & Prieska PV Facilities, Northern Cape | GeStamp | Project Manager |
| ECO for the Construction of the Kathu PV Facility, Northern Cape | REISA / Building Energy | Project Manager |

Compliance Advice and ESAP Reporting

| Project Name & Location | Client Name | Role |
|--|-------------------------|-----------------------|
| ACWA Power SolarReserve Redstone Solar Plant, Northern Cape | SolarReserve | Environmental Advisor |
| Bokpoort PV SEF, Northern Cape | Solafrica | Environmental Advisor |
| Boshof PV SEF, Free State | BlueWave | Environmental Advisor |
| Hennenman PV SEF, Free State | BlueWave | Environmental Advisor |
| Kathu II SEF, Northern Cape | Building Energy | Environmental Advisor |
| Kathu PV SEF, Northern Cape | Building Energy / REISA | Environmental Advisor |
| Prieska PV SEF, Northern Cape | VentuSA | Environmental Advisor |
| San Solar SEF, Northern Cape | VentuSA / Acciona | Environmental Advisor |
| Sishen PV SEF Phase 1, Northern Cape | Aveng / Acciona | Environmental Advisor |
| Wolmaransstad Municipality Solar PV SEF, North West | BlueWave | Environmental Advisor |
| ESAP reporting for the operation phase of the Mulilo Solar PV De Aar and Mililo Solar PV Prieska | Mulilo and X-Elio | Environmental Advisor |

Due Diligence Reporting

| Project Name & Location | Client Name | Role |
|---|----------------------------------|-----------------------|
| Kabi Kimberley PV Plant, Northern Cape | Enertis Solar | Environmental Advisor |
| Sishen Solar Farm, Northern Cape | Acciona (Windfall 59 Properties) | Environmental Advisor |
| Vaal River Solar 1 PV plant, North West | Enertis Solar | Environmental Advisor |

Environmental Permitting & Water Use License (WUL) Applications

| Project Name & Location | Client Name | Role |
|--|--------------------|-----------------------|
| Permitting for the Kathu PV SEF, Northern Cape | Abengoa Solar | Project Manager & EAP |
| S53 application for Kabi Kimberley De Beers PV Plant, Northern Cape | Kabi Energy | Project Manager & EAP |
| S53 application for the Blackwood PV SEF, Free State | VentuSA Energy | Project Manager & EAP |
| S53 application for the Boundary PV SEF, Northern Cape | VentuSA Energy | Project Manager & EAP |
| S53 application for Vaalkop & Witkop PV SEF's, North West | Kabi Energy | Project Manager & EAP |
| S53 applications for various projects (Amandla Welang, Didar, Inkululeko, Kleinfontein, Klip Gat, Naau Poort, Toitdale & Tollie PV SEF's), Northern Cape | Terra Solar | Project Manager & EAP |
| WUL application for the Woodhouse PV1 & PV2 SEF's, North West | Genesis Eco-Energy | Project Manager & EAP |

RENEWABLE POWER GENERATION PROJECTS: CONCENTRATED SOLAR FACILITIES (CSP)**Environmental Impact Assessments and Environmental Management Programmes**

| Project Name & Location | Client Name | Role |
|---|--|-----------------------|
| De Aar CSP Energy facility, Northern Cape | African Clean Energy Developments (ACED) | Project Manager & EAP |
| Khi Solar One CSP facility, Northern Cape | Abengoa Solar | Project Manager & EAP |
| Noupoort CSP facility, Northern Cape | Cresco | Project Manager & EAP |
| Paulputs CSP facility, Northern Cape | Abengoa Solar | Project Manager & EAP |
| Pofadder & Upington CSP facilities, Northern Cape | Abengoa Solar | Project Manager & EAP |
| SolarReserve Kotulo Tsatsi CSP facility, Northern Cape province | SolarReserve | Project Manager & EAP |
| SolarReserve Kotulo Tsatsi CSP1 facility, Northern Cape | Kotulo Tsatsi Energy and SolarReserve South Africa | Project Manager & EAP |
| SolarReserve Kotulo Tsatsi CSP2 facility, Northern Cape | Kotulo Tsatsi Energy and SolarReserve South Africa | Project Manager & EAP |
| SolarReserve Kotulo Tsatsi CSP3 facility, Northern Cape | Kotulo Tsatsi Energy and SolarReserve South Africa | Project Manager & EAP |
| Upington 2 CSP facility, Northern Cape | Abengoa Solar | Project Manager & EAP |
| Upington 3 CSP facility, Northern Cape | Abengoa Solar | Project Manager & EAP |
| Xina Solar One CSP facility, Northern Cape | Abengoa Solar | Project Manager & EAP |

Environmental Compliance, Auditing and ECO

| Project Name & Location | Client Name | Role |
|--|--------------------|-----------------|
| KaXu Solar One facility, Northern Cape | Abengoa Solar | Project Manager |
| Khi Solar One facility, Northern Cape | Abengoa Solar | Project Manager |
| Xina Solar One facility, Northern Cape | Abengoa Solar | Project Manager |

Screening Studies

| Project Name & Location | Client Name | Role |
|---|--------------------|-----------------------|
| Site Identification Tool for Proposed CSP Projects, Limpopo | Exxaro | Environmental Advisor |

Compliance Advice and ESAP reporting

| Project Name & Location | Client Name | Role |
|---|---------------|-----------------------|
| Kaxu Solar One CSP facility, Northern Cape | Abengoa Solar | Environmental Advisor |
| Khi Solar One CSP facility, Northern Cape | Abengoa Solar | Environmental Advisor |
| SolarReserve Kotulo Tsatsi CSP facility, Northern Cape province | SolarReserve | Environmental Advisor |
| Xina One CSP facility, Northern Cape | Abengoa Solar | Environmental Advisor |

RENEWABLE POWER GENERATION PROJECTS: WIND ENERGY FACILITIES

Environmental Impact Assessments and Environmental Management Programmes

| Project Name & Location | Client Name | Role |
|---|--|-----------------------|
| ABs WEF near Indwe, Eastern Cape | Rainmaker Energy | Project Manager & EAP |
| Amakhala Emoyeni WEF, Eastern Cape | Windlab Developments | Project Manager & EAP |
| Amatole (2 phases) WEF, Eastern Cape | Genesis ECO-Energy | Project Manager & EAP |
| Boulders Wind Farm, Western Cape | IPD Power | Project Manager & EAP |
| Britannia Bay WEF, Western Cape | Terra Power Solutions | Project Manager & EAP |
| Castle WEF in De Aar, Northern Cape | Juwi Renewable Energies | Project Manager & EAP |
| Cookhouse WEF, Eastern Cape | African Clean Energy Developments (ACED) & Tertia Waters | Project Manager & EAP |
| Deep River Wind Energy Facility, Eastern Cape | VentuSA Energy | Project Manager & EAP |
| Dorper Phase 1 WEF, Eastern Cape | Rainmaker Energy | Project Manager & EAP |
| Elliot WEF, Eastern Cape | Rainmaker Energy | Project Manager & EAP |
| Garob WEF, Northern Cape | Juwi Renewable Energies | Project Manager & EAP |
| Gouda WEF, Western Cape | VentuSA Energy | Project Manager & EAP |
| Great Karoo WEF, Northern Cape | African Clean Energy Developments (ACED) | Project Manager & EAP |
| Gunstfontein WEF, Northern Cape | African Clean Energy Developments (ACED) | Project Manager & EAP |
| Happy Valley WEF, Eastern Cape | REISA | Project Manager & EAP |
| Hidden Valley WEF, Northern Cape | African Clean Energy Developments (ACED) | Project Manager & EAP |
| Hopefield WEF, Western Cape | Umoya Energy | Project Manager & EAP |
| Karoo Renewable Energy Facility, Northern & Western Cape | SARGE | Project Manager & EAP |
| Karreebosch Wind Farm (Roggeveld Phase 2), Northern Cape & Western Cape | G7 Renewable Energies | Project Manager & EAP |
| Karusa Wind Farm, Northern Cape | African Clean Energy Development | Project Manager & EAP |
| Klipheuwel / Dassiesfontein WEF, Western Cape | BioTherm Energy | Project Manager & EAP |
| Nojoli WEF, Eastern Cape | African Clean Energy Developments | Project Manager & EAP |
| Nxuba WEF, Eastern Cape | African Clean Energy Developments | Project Manager & EAP |
| Olifants River WEF, Western Cape | SARGE | Project Manager & EAP |

| Project Name & Location | Client Name | Role |
|---|----------------------------------|-----------------------|
| Oyster Bay WEF, Eastern Cape | RES | Environmental Advisor |
| Pofadder x3 WEF's, Northern Cape | Mainstream Renewable | Project Manager & EAP |
| Project Blue WEF, Northern Cape | Windy World | Project Manager & EAP |
| Rheboksfontein WEF, Western Cape | Moyeng Energy | Project Manager & EAP |
| Riverbank WEF near Wesley, Eastern Cape | Just Energy | Project Manager & EAP |
| Sere WEF, Western Cape | Eskom Generation | Project Manager & EAP |
| Soetwater Wind Farm, Northern Cape | African Clean Energy Development | Project Manager & EAP |
| Springfontein WEF, Northern Cape | Mainstream Renewable | Project Manager & EAP |
| Stormberg WEF, Eastern Cape | Networx / Prana Energy | Project Manager & EAP |
| Suurplaat WEF, Western & Northern Cape | Moyeng Energy | Project Manager & EAP |
| Uiekraal WEF, Western Cape | Crenergol | Project Manager & EAP |
| West Coast One WEF, Western Cape | Moyeng Energy | Project Manager & EAP |
| West Coast WEF, Western Cape | Exxaro | Project Manager & EAP |
| Zen WEF near Gouda, Western Cape | VentuSA Energy | Project Manager & EAP |

Basic Assessments

| Project Name & Location | Client Name | Role |
|--|-----------------------|-----------------------|
| Britannia Bay Wind Monitoring Mast, Western Cape | Terra Power Solutions | Project Manager & EAP |
| Caledon, Worcester & Tulbach Wind Monitoring Masts, Western Cape | SAGIT | Project Manager & EAP |
| Deep River Wind monitoring Mast, Eastern Cape | VentuSA Energy | Project Manager & EAP |
| Denhami Wind Farm, Western Cape | Richard Young | Project Manager & EAP |
| Dorper, Abs & Dobos Wind Monitoring Masts, Eastern Cape | Rainmaker Energy | Project Manager & EAP |
| Hopefield Wind Monitoring Mast, Western Cape | Umoya Energy | Project Manager & EAP |
| Klawer Wind Energy Facility, Western Cape | Vendiwell | Project Manager & EAP |
| Klipheuwel / Dassiesfontein Wind Monitoring Mast, Western Cape | BioTherm Energy | Project Manager & EAP |
| Riverbank Wind Monitoring Mast, Eastern Cape | Just Energy | Project Manager & EAP |
| Wind Monitoring Masts near Suurplaat, Western Cape | Investec Bank | Project Manager & EAP |
| Wind Monitoring Masts on the West Coast & Darling, Western Cape | Investec Bank | Project Manager & EAP |

Screening Studies

| Project Name & Location | Client Name | Role |
|--|--|-----------------------|
| Cookhouse WEF, Eastern Cape | African Clean Energy Developments (ACED) | Project Manager & EAP |
| De Aar WEF, Northern Cape | African Clean Energy Developments (ACED) | Project Manager & EAP |
| Developments within identified areas in the Overberg, Western Cape | BioTherm Energy | Project Manager & EAP |
| Hopefield WEF, Western Cape | African Clean Energy Developments (ACED) | Project Manager & EAP |
| Juno WEF, Western Cape | AMDA Developments | Project Manager & EAP |
| Lambert's Bat WEF, Western Cape | Vaayu Energy SA | Project Manager & EAP |
| Wind 500 – Eskom's investigation for new sites | Eskom Holdings | Project Manager & EAP |
| Struisbaai area WEF, Western Cape | Richard Young | Project Manager & EAP |
| Suurplaat WEF, Western Cape | Investec Bank | Project Manager & EAP |
| Theewaterskloof Municipality WEF, Western Cape | Theewaterskloof Municipality | Project Manager & EAP |

| Project Name & Location | Client Name | Role |
|--|---|-----------------------|
| WEF's on x2 site on the West Coast, Western Cape | Investec Bank | Project Manager & EAP |
| Various WEF's in the Western Cape | Department of Environmental Affairs & Development Planning (DEA&DP) | Project Manager & EAP |
| Van Reenens WEF, Kwa-Zulu Natal & Free State | 4GREEN Development Africa | Project Manager & EAP |
| WEF Development within the Sandveld area, Western Cape | Kovacs Investments (Nick Prium) | Project Manager & EAP |

Environmental Compliance, Auditing and ECO

| Project Name & Location | Client Name | Role |
|--|---------------------|-----------------|
| ECO for the Construction of the Dorper Phase 1 WEF, Eastern Cape | Rainmaker Energy | Project Manager |
| ECO for the Construction of the Gouda Wind Farm, Western Cape | Blue Falcon Trading | Project Manager |
| EO for the Construction of the Dassiesklip WEF, Western Cape | Group Five | Project Manager |

Compliance Advice & ESAP Reporting

| Project Name & Location | Client Name | Role |
|--------------------------------------|--|-----------------------|
| Amakhala Emoyeni WEF, Eastern Cape | Windlab Developments | Environmental Advisor |
| Cookhouse II WEF, Eastern Cape | African Clean Energy Developments | Environmental Advisor |
| Cookhouse WEF, Eastern Cape | African Clean Energy Developments | Environmental Advisor |
| Dorper Phase 1 WEF, Eastern Cape | Rainmaker Energy | Environmental Advisor |
| Garob WEF, Northern Cape | Juwi Renewable Energies | Environmental Advisor |
| Gouda WEF, Western Cape | Aveng / Acciona | Environmental Advisor |
| Happy Valley WEF, Eastern Cape | VentuSA Energy / EDPR | Environmental Advisor |
| Hidden Valley WEF, Northern Cape | African Clean Energy Developments (ACED) | Environmental Advisor |
| Hopefield WEF, Western Cape | Umoya Energy | Environmental Advisor |
| Karusa Wind Farm, Northern Cape | African Clean Energy Development | Environmental Advisor |
| Loperberg WEF, Eastern Cape | Rainmaker Energy | Environmental Advisor |
| Nobelsfontein WEF, Northern Cape | Coria / SARGE | Environmental Advisor |
| Nojoli WEF, Eastern Cape | African Clean Energy Developments (ACED) | Environmental Advisor |
| Nxuba WEF, Eastern Cape | African Clean Energy Developments | Environmental Advisor |
| Oyster Bay WEF, Eastern Cape | RES | Environmental Advisor |
| Riverbank Wind WEF, Eastern Cape | InnoWind | Environmental Advisor |
| Roggeveld Phase 1 WEF, Northern Cape | Building Energy | Environmental Advisor |
| Soetwater Wind Farm, Northern Cape | African Clean Energy Development | Environmental Advisor |
| Springfontein WEF, Northern Cape | Mainstream Renewable | Environmental Advisor |
| Zen WEF, Western Cape | VentuSA Energy | Environmental Advisor |

Due Diligence Reporting

| Project Name & Location | Client Name | Role |
|------------------------------------|---------------------|-----------------------|
| Gouda WEF, Western Cape | Blue Falcon Trading | Environmental Advisor |

| Project Name & Location | Client Name | Role |
|--|-----------------|-----------------------|
| Loeriesfontein, Khobab & Noupoort WEF's, Northern Cape | Actis | Environmental Advisor |
| Roggeveld Wind Farm, Northern Cape | Building Energy | Environmental Advisor |

Environmental Permitting & WUL Applications

| Project Name & Location | Client Name | Role |
|--|--|-----------------------|
| Permitting for the Cookhouse WEF, Eastern Cape | African Clean Energy Developments (ACED) | Project Manager & EAP |
| Permitting for the Karusa Wind Farm, Northern Cape | African Clean Energy Development | Project Manager & EAP |
| Permitting for the Sere WEF, Western Cape | Eskom | Project Manager & EAP |
| Permitting for the Soetwater Wind Farm, Northern Cape | African Clean Energy Development | Project Manager & EAP |
| Permitting Riverbank WEF, Eastern Cape | Electrawinds | Project Manager & EAP |
| S24G for the Klipheuwel / Dassiesfontein WEF, Western Cape | | Project Manager & EAP |
| S53 application for the Nxuba Wind Farm, Eastern Cape | African Clean Energy Developments (ACED) | Project Manager & EAP |
| S53 Application for the Zen WEF, Western Cape | VentuSA Energy | Project Manager & EAP |
| WUL application for the Oyster Bay WEF, Eastern Cape | RES | Project Manager & EAP |

CONVENTIONAL POWER GENERATION PROJECTS (COAL)

Environmental Impact Assessments and Environmental Management Programmes

| Project Name & Location | Client Name | Role |
|-------------------------------------|-------------|-----------------------|
| H2 Energy Power Station, Mpumalanga | H2 Energy | Project Manager & EAP |

Screening Studies

| Project Name & Location | Client Name | Role |
|---|-------------|-----------------------|
| Coal fired power station in the Bethal area, Mpumalanga | ISS Global | Project Manager & EAP |
| Indwe Power Station, Eastern Cape | IPSA | Project Manager & EAP |
| IPP Base Load Power Station Development in Lephalale, Limpopo | Exxaro | Project Manager & EAP |

Environmental Compliance, Auditing and ECO

| Project Name & Location | Client Name | Role |
|---|----------------|-----------------|
| ISO 14001:2015 Audit for the Hendrina Power Station, Mpumalanga | Eskom Holdings | Project Manager |

GAS to POWER GENERATION PROJECTS

Environmental Impact Assessments and Environmental Management Programmes

| Project Name & Location | Client Name | Role |
|--|------------------|-----------------------|
| Ankerlig OCGT to CCGT Conversion project & the Transmission Power Line between Ankerlig and the Omega Substation, Western Cape | Eskom Generation | Project Manager & EAP |
| Gourikwa OCGT to CCGT Conversion project & the Transmission Power Line between Gourikwa and the | Eskom Generation | Project Manager & EAP |

| | | |
|--|--------|-----------------------|
| Proteus Substation, Western Cape | | |
| Neopak Combined Heat and Power (CHP) Plant, Rosslyn, Gauteng | Neopak | Project Manager & EAP |
| Richards Bay Combined Cycle Gas Turbine (CCGT) Power Plant, Kwa-Zulu Natal | Eskom | Project Manager & EAP |

Screening Studies

| Project Name & Location | Client Name | Role |
|--|--------------------|-----------------|
| Environmental Analysis for Gas Transmission Pipelines in the Clayville, Nigel and Wadeville areas, Gauteng | Energy Group | Project Manager |

INFRASTRUCTURE DEVELOPMENT PROJECTS (BRIDGES, PIPELINES, ROADS, WATER RESOURCES, STORAGE, ETC)

Environmental Impact Assessments and Environmental Management Programmes

| Project Name & Location | Client Name | Role |
|--|--|-----------------------|
| Afguns Road Realignment Project, Limpopo | Eskom Holdings | Project Manager & EAP |
| Expansion of the existing Welgedacht Water Care Works, Gauteng | ERWAT | Project Manager & EAP |
| Industrial Metals Cluster, Northern Cape | Northern Cape Department of Economic Development and Tourism | Project Manager & EAP |
| Modification of the existing Hartebeestfontein Water Care Works, Gauteng | ERWAT | Project Manager & EAP |

Basic Assessments

| Project Name & Location | Client Name | Role |
|---|--|-----------------------|
| New Raw Water Reservoir & Pipeline for the Medupi Power Station, Limpopo | Eskom Holdings | Project Manager & EAP |
| Msenge Emoyeni WEF Watercourse Crossings, Eastern Cape | Windlab | Project Manager & EAP |
| Dilokong Transport Facility, Limpopo | South African National Roads Agency Limited (SANRAL) | Project Manager & EAP |
| Neopak Water Treatment Plant, Gauteng | Neopak | Project Manager & EAP |
| Realignment of MR73 Road for the Construction of the Paulputs CSP Facility, Northern Cape | Abengoa Solar | Project Manager & EAP |
| Biomass Storage Area in Support of the Mkuze Biomass Power Station, KwaZulu-Natal | Building Energy | Project Manager & EAP |
| Wastewater Dam & Pipeline in Support of the Mkuze Biomass Power Station, Kwa-Zulu Natal | Building Energy | Project Manager & EAP |
| Watercourse Crossings for the Klawer Wind Energy Facility, Western Cape | Vendiwell | Project Manager & EAP |

Environmental Compliance, Auditing and ECO

| Project Name & Location | Client Name | Role |
|--|---------------------------------|-----------------|
| ECO for the Construction of the Tiffindell Ski Resort, Eastern Cape | Tiffindell Ski | ECO |
| ECO for the Distribution centre & warehouse at Lords View Industrial Estate, Gauteng | Oliver & Partners | Project Manager |
| ECO for the Upgrade of the Waterval Wastewater Treatment Works, Gauteng | BCP Palace (on behalf of ERWAT) | Project Manager |

Compliance Advice and reporting

| Project Name & Location | Client Name | Role |
|-------------------------------------|--------------------|-----------------------|
| Mkuze Biomass Plant, Kwa-Zulu Natal | Building Energy | Environmental Advisor |
| Tiffindell Ski, Eastern Cape | Tiffindell Ski | Environmental Advisor |

Environmental Permitting & WUL Applications

| Project Name & Location | Client Name | Role |
|--|--------------------|-----------------------|
| Permitting, S53 & WULA for the Mkuze Biomass Plant, Kwa-Zulu Natal | Building Energy | Project Manager & EAP |
| WULA for the Visserhok Waste Tyre Depot, Western Cape | REDISA | Project Manager & EAP |
| WULA for the Witbank Waste Tyre Depot, Mpumalanga | REDISA | Project Manager & EAP |

MINING

Environmental Compliance, Auditing and ECO

| Project Name & Location | Client Name | Role |
|--|--------------------|-----------------|
| Compliance Audit for the Palesa Coal Mine WML, Mpumalanga province | HCI Coal | Project Manager |
| Compliance Audit Waste Use Licene for the Mbali Coal Mine, Mpumalanga province | HCI Coal | Project Manager |

ENVIRONMENTAL MANAGEMENT TOOLS

| Project Name & Location | Client Name | Role |
|--|---|-----------------------|
| Review the effectiveness & efficiency of the environmental impact management (EIA) system in South Africa, and formulate an environmental impact management strategy and action plan | National Department of Environmental Affairs | Environmental Advisor |
| Drafting a Position Paper: Project Financing and Environmental Risk Management (considering IFC Performance Standards & Equator Principles) | Standard Bank Group | Environmental Advisor |
| EMP for the Phase 1 of the Elitheni Coal Mine Project, Eastern Cape | Elitheni Coal | Environmental Advisor |
| Gap Analysis of Environmental Management Systems (EMS) with ISO 14001:2004 | Venture Diversified Products | Environmental Advisor |
| Development of Provincial Guidelines for 4x4 routes | Western Cape Department of Environmental Affairs & Development Planning | Environmental Advisor |
| Permitting Study on the Status of Renewable Energy Projects in South Africa | E.ON | Environmental Advisor |
| Practical review of EGI SEA | CSIR | Environmental Advisor |
| Development & Implementation of the Environmental Management Systems (EMS) with ISO 14001:2004 for the UBS Office in Sandton, Gauteng | UBS AG | Environmental Advisor |

| | | |
|---|-------------------|-----------------------|
| Resource & Efficiency Plans for the operation phase of the Mulilo Solar PV De Aar and Mililo Solar PV Prieska | Mulilo and X-Elio | Environmental Advisor |
|---|-------------------|-----------------------|

TRAINING

| Project Name & Location | Client Name | Role |
|---|--------------------|-----------------|
| Hendrina Power Station Environmental Law Training | Eskom Holding | Project Manager |
| Radar Training for NCC Biologists | EchoTracks | Project Manager |



CURRICULUM VITAE OF NKHENSANI MASONDO

- Profession :** Senior Environmental Consultant
- Specialisation:** Environmental Management, Environmental Impact Assessments, Report Writing, Project Management, Stakeholder Engagement, Environmental Auditing
- Work Experience:** 6 years in the Environmental Management Consulting Field

VOCATIONAL EXPERIENCE

Nkhensani is an EAPASA Registered Environmental Assessment Practitioner with over 6 years of experience in the environmental field. She holds a BSocSci (Hons) in Environmental Management and Analysis and a BA (Own Choice) specialising in Geography and Archaeology, both from the University of Pretoria (UP). She is currently pursuing her MSc in Environmental Management at the University of South Africa (UNISA).

She has been involved in residential, commercial, institutional, industrial, and mixed-use development within South Africa. She has been involved in mine closure strategies and implementation plans on behalf of Mining partners. Her main responsibilities include compilation of environmental reports, stakeholder engagement, and project management.

SKILLS BASE AND CORE COMPETENCIES

- Environmental Planning
- Compilation of Environmental Impact Assessments, Basic Assessments, Water Use Licenses, NEMA Queries, GPEMF Applications, General Authorisations, Schedule 1 and Existing Lawful Use Applications
- Compilation and Implementation of Environmental Programmes
- Undertaking Environmental Audits for residential, commercial, and industrial developments
- Project Management of various projects
- Review of Specialists reports
- Undertaking Stakeholder Engagements for a variety of projects

EDUCATION AND PROFESSIONAL STATUS

Degrees:

- Master of Science in Environmental Management (current), University of South Africa
- BSocSci (Hons) Environmental Analysis and Management (2014), University of Pretoria
- BA (Own Choice) Specialising in Geography and Archaeology (2013), University of Pretoria

Short Courses:

- Geographical Information Systems Training (ESRI) 2016
- ISO 14001: 2004 Lead Environmental Auditor Training: Environmental Management Systems (SGS) 2015

Professional Society Affiliations:

- Environmental Assessment Practitioners Association of South Africa – Environmental Assessment Practitioner

| EMPLOYMENT | | |
|--------------------------|---|--|
| Date | Company | Roles and Responsibilities |
| 01 June 2022 - Current: | Savannah Environmental (Pty) Ltd | <p>Senior Environmental Consultant</p> <p><u>Tasks include:</u></p> <ul style="list-style-type: none"> • Play a lead role in environmental permitting, environmental authorisation applications, and compliance and advice and assurance. • Project management, execute draft, review and/or further develop and manage the delivery of environmental impact assessments (EIA) reports and EMPs in line with the requirements of NEMA and the EIA regulations. • Environmental Permitting (including WULA), environmental authorisation applications and associated stakeholder engagement and public participation. • Manage the delivery of specialist environmental consultants and their reporting, as may be required. Manage any third parties or sub-consultants to which functions have been outsourced. • Project-related GIS mapping. • New business development and the preparation of proposals. |
| August 2017 – May 2022 | LEAP: Landscape Architects and Environmental Planners (Imbrillinx CC) | <p>Environmental Assessment Practitioner</p> <p><u>Task included:</u></p> <ul style="list-style-type: none"> • Compiling Scoping Reports, Integrated Wastewater • Management Plans, Water Use License Applications, General • Authorisations, Schedule 1 Borehole Registrations, Basic • Assessment Reports, Environmental Management Programmes, • Section 24G Applications and Appeals, conducting site inspections. • Compiling Water Quality Monitoring, compiling wetland rehabilitation and management reports. • Stakeholder Engagement. • Project Management • Act as a liaison officer for the company with State Departments. |
| May 2015 – December 2016 | LEAP: Landscape Architects and Environmental Planners (Imbrillinx CC) | <p><i>Environmental Control Officer</i></p> <p><u>Tasks Included</u></p> <ul style="list-style-type: none"> • Formulated and implemented long-range plans for environmental programs. |

| | | |
|--|--|---|
| | | <ul style="list-style-type: none"> Performed inspections, groundwater sampling and soil sampling. Performed environmental site assessments and provided remediation recommendations. Inspected sites to ensure adherence to environmental regulations. Training of contractors of appropriate environmental practices. Attending site meetings with contractors. Liaison with state departments. Act as a public participation assistant as and when required. |
|--|--|---|

PROJECT EXPERIENCE

INFRASTRUCTURE DEVELOPMENT PROJECTS (PIPELINES, WATER RESOURCES AND INDUSTRIAL

Basic Assessment and Environmental Programmes

| Project | Client Name | Role |
|--|---|--------------------------------|
| Lombardy East Stream Flow Reduction Activities | Johannesburg Road Agency | Project Manager & EAP |
| The Whisken K54 Road development | Balwin Properties Limited on behalf of Gautrans | Public Participation Assistant |

Part 1 Amendment

| Project | Client Name | Role |
|---------------------|-------------|-----------------------|
| Malibongwe Pipeline | Codevco | Project Manager & EAP |

Water Use License Applications and Environmental Programmes

| Project | Client Name | Role |
|--|---|-----------------------|
| Crowthorne Leogem Sewer Pipeline | Leogem Property Projects (Pty) Ltd on behalf of | Project Manager & EAP |
| Diepsloot Klevebank Sewer pipeline | Eris Property Group (Pty) Limited | Project Manager & EAP |
| Kyalami Heights X4 Sewer Pipeline | Church of Scientology | Project Manager & EAP |
| Lombardy East Stream Flow Reduction Activities | Johannesburg Road Agency | Project Manager & EAP |

General Authorisation

| Project | Client Name | Role |
|--|---|-------------------------|
| Alinta Extension 4 Stormwater Infrastructure | Balwin Properties | Project Manager & EAP |
| Celtisdal Stormwater Infrastructure | Cosmopolitan Projects (Tshwane) Pty Ltd | Project Manager and EAP |
| Erasmus Estate – Road Crossing | Erasmus Estate Trust | EAP |
| Olivedale Retirement Village Stormwater Infrastructure | Olivedale Retirement Village NPO | EAP |
| Gem Valley Mixed Use Development Stormwater Culvert | Central Developments (Pty) Ltd | Project Manager & EAP |

Environmental Compliance

| Project | Client Name | Role |
|---------------------------------|----------------------------------|------|
| Diepsloot Porcupine Park Avenue | Valumax Northern Farms (Pty) Ltd | ECO |

HOUSING AND URBAN PROJECTS

Environmental Impact Assessments and Environmental Management Programmes (EMPr)

| Project | Client Name | Role |
|--|------------------------------|-----------------------|
| Dersley Springs Mixed Used Development | Royal Albatross (Pty) Ltd | EAP |
| Green Valley Residential Development | Balwin Properties Limited | Project Manager & EAP |
| Irene Ridge Mixed Use Development | M&T Developments | EAP |
| Onderstepoort Extension 42 Mixed Use Development | Power Developments (Pty) Ltd | EAP |
| Reigerpark X10 Mixed Use Development | Living Africa (Pty) Ltd | EAP |
| Sammy Marks Mixed Use Development | Abland | EAP |
| Swaziland | | |

Basic Assessments and Environmental Management Programmes

| Project | Client Name | Role |
|--|--|-----------------------|
| Atteridgeville X47 Light Industrial Development | JT Group (Pty) Ltd | Project Manager |
| Erasmus Estate Mixed Use Development | Erasmus Estate Trust | EAP |
| Germiston Cemetery | Living Africa (Pty) Ltd | Project Manager & EAP |
| Homes Haven X24 | Central Developments (Pty) Ltd | EAP |
| Leeuwfontein Shopping Centre | McCormick Property Group | Project Manager & EAP |
| Lewende Woord Bronkhorstspuit Church and Rehabilitation Centre | Lewende Woord Church and Rehabilitation Centre | EAP |
| Spes Magte | South African Special Forces | EAP |
| Waterfall Polofields | Balwin Properties | EAP |
| Willaway Residential Development | 3V Projects | EAP |
| Waterkloof Marina Retirement Village | Central Development Projects | EAP |

Part 2 Amendments

| | | |
|--------------------------------------|-----------------------------------|-----------------------|
| Gem Valley Hauptfleisch | Gem Valley Hauptfleisch (Pty) Ltd | Project Manager & EAP |
| Greenlee Residential Develop | Balwin Properties Limited | EAP |
| Heidelberg X25 Mixed Use Development | Mantracare (Pty) Ltd | Project Manager & EAP |
| The Reid Montessorri School | Balwin Properties | EAP |

Part 1 Amendments

| | | |
|---|----------------------------------|-----------------------|
| Apex X10 Industrial Development | Moolman Group | EAP |
| Amberfield X47 | Central Developments (Pty) Ltd | Project Manager |
| Clayville X50 and X71 Mixed Use Development | Valumax Midrand (Pty) Ltd | Project Manager & EAP |
| Klerksoord Mixed Use Development | SafDev (Pty) Ltd | Project Manager & EAP |
| Mooikloof Mega City | Balwin Properties Limited | EAP |
| Riverside View X30 – X35 | Valumax Northern Farms (Pty) Ltd | Project Manager & EAP |

GPEMF

| Project | Client Name | Role |
|--|-------------------------------------|-----------------------|
| Krugerus X9 Residential Development | Moolman Group | Project Manager & EAP |
| Linbro Park Klulee Residential Development | Balwin Properties Limited | Project Manager & EAP |
| Theresa Park X66 & X67 | Social Housing Regulatory Authority | Project Manager & EAP |

NEMA Query

| Project | Client Name | Role |
|---------------------------------|---------------------------|-----------------------|
| Kwa-Mhlanga Crossing | Top Spot (Pty) Ltd | Project Manager & EAP |
| Waterfall Polofields Show block | Balwin Properties Limited | EAP |

24G Rectification Application

| Project | Client Name | Role |
|------------------|-------------|-----------------|
| Dekenah Street | Alrode CC | EAP |
| Mopane Grootvlei | RuaCon | Project Manager |

Water Use License Applications

| Project Name | Client Name | Role |
|---|-----------------------------------|-----------------------|
| Botesdal X15 Light Industrial Development | Open Energy (Pty) Ltd | Project Manager & EAP |
| Clayville X45 Mixed Use Development | Valumax Midrand (Pty) Ltd | Project Manager & EAP |
| Ermelo Shopping Centre | Moolman Group | Project Manager & EAP |
| Gem Valley Hauptfleisch Mixed Use Development | Gem Valley Hauptfließch (Pty) Ltd | Project Manager & EAP |
| Lewende Woord Bronkhorstspuit Church and Rehabilitation | Lewende Woord Bronkhorstspuit | Project Manager & EAP |
| Matsamo Mall Shopping Centre | Moolman Group | Project Manager & EAP |
| Miracle Meadow Water Bottling Facility | Mr Pieter du Randt Pretorius | Project Manager & EAP |
| Reigerpark Extension 10 and Comet X18 Mixed Use Development | Living Africa 2 (Pty) Ltd | Project Manager & EAP |
| Norton Park X8 Residential Development | SSI Group | Project Manager & EAP |
| Onderstepoort X42 Mixed Use Development | Power Developments (Pty) Ltd | Project Manager & EAP |
| The Whisken | Balwin Properties Limited | Project Manager & EAP |
| Zwartkop 187 Mixed Use Development | Moolman Group | Project Manager & EAP |
| Zuurfontein Ptn 221 Residential Development | M&T Developments | Project Manager & EAP |

General Authorisations

| Project | Client Name | Role |
|--------------------------------|--------------------|-----------------------|
| Thokoza Park Recreational Park | City of Ekurhuleni | Project Manager & EAP |

Schedule 1 Authorisations

| Project | Client Name | Role |
|---------------------------------|---------------------------|-----------------------|
| Builders Warehouse Midrand | Massmart (Pty) Ltd | Project Manager |
| Greenlee Borehole Registration | Balwin Properties Limited | Project Manager & EAP |
| Willway Residential Development | 3V projects (Pty) Ltd | Project Manager & EAP |

Environmental Auditing

| Project | Client Name | Role |
|---------------------------------------|----------------------------------|-------------------------------|
| Amberfield Estate | Central Developments (Pty) Ltd | Environmental Control Officer |
| Blue Hills Equestrian Estate | Century Property Development | Environmental Control Officer |
| Chuma Mall | Eris Property Group | Environmental Control Officer |
| Diepsloot Ptn 1 Mixed Use Development | Valumax Northern Farms (Pty) Ltd | Environmental Control Officer |
| Kyalami Hills | Balwin Properties Limited | Environmental Control Officer |
| Kyalami Ridge Mall | Kyalami Retail Africa | Environmental Control Officer |
| South Hills Mixed Use Estate | Calgro M3 | Environmental Control Officer |
| Waterfall Estate | Century Property Developments | Environmental Control Officer |

CURRICULUM VITAE OF NICOLENE VENTER

| | |
|-------------------------|--|
| Profession : | Public Participation and Social Consultant |
| Specialisation: | Public participation process; stakeholder engagement; facilitation (workshops, focus group and public meetings; public open days; steering committees); monitoring and evaluation of public participation and stakeholder engagement processes |
| Work Experience: | 23 years' experience as a Public Participation Practitioner and Stakeholder Consultant |

VOCATIONAL EXPERIENCE

Over the past 23 years Nicolene established herself as an experienced and well recognised public participation practitioner, facilitator and strategic reviewer of public participation processes. She has experience in managing public participation and stakeholder engagement projects and awareness creation programmes. Her experience includes designing and managing countrywide public participation and stakeholder engagement projects and awareness creation projects, managing multi-project schedules, budgets and achieving project goals. She has successfully undertaken several public participation processes for EIA, BA and WULA projects. The EIA and BA process include linear projects such as the NMPP, Eskom Transmission and Distribution power lines as well as site specific developments such as renewable energy projects i.e. solar, photo voltaic and wind farms. She also successfully managed stakeholder engagement projects which were required to be in line with the Equator Principles, locally and in neighbouring countries.

SKILLS BASE AND CORE COMPETENCIES

- Project Management
- Public Participation, Stakeholder Engagement and Awareness Creation
- Public Speaking and Presentation Skills
- Facilitation (workshops, focus group meetings, public meetings, public open days, working groups and committees)
- Social Assessments (Stakeholder Analysis / Stakeholder Mapping)
- Monitoring and Evaluation of Public Participation and Stakeholder Engagement Processes
- Community Liaison
- IFC Performance Standards
- Equator Principles
- Minute taking, issues mapping, report writing and quality control

EDUCATION AND PROFESSIONAL STATUS

Degrees / Diplomas / Certificates:

- Higher Secretarial Certificate, Pretoria Technicon (1970)

Short Courses:

- Techniques for Effective Public Participation, International Association for Public Participation, IAP2 (2008)
- Foundations of Public Participation (Planning and Communication for Effective Public Participation), IAP2 (2009)
- Certificate in Public Participation – IAP2SA Modules 1, 2 and 3 (2013)

Certificate in Public Relations, Public Relation Institute of South Africa, Damelin Management School (1989)

Professional Society Affiliations:

- Member of International Association for Public Participation (IAP2): Southern Africa

EMPLOYMENT

| Date | Company | Roles and Responsibilities |
|-------------------------|----------------------------------|---|
| November 2018 – current | Savannah Environmental (Pty) Ltd | <p>Public Participation and Social Consultant</p> <p><u>Tasks include:</u></p> <p><i>Tasks include: Drafting of a Public Participation Plan with key deliverable dates and methodology to be followed, Background Information Document, Letters to Stakeholders and Interested and/or Affected Parties (I&APs) inclusive of key project deliverables and responses to questions / concerns raised; Stakeholder identification; facilitating stakeholder workshops, focus group and public meetings; conduct one-on-one consultation with Community Leaders, Tribal Chiefs, affected landowners, etc.</i></p> <p><i>Managing interaction between Stakeholders and Team Members, liaising with National, Provincial and Local Authorities, managing community consultation and communications in project affected areas, attend to the level of technical information communicated to and consultation with all level of stakeholders involved.</i></p> |

| Date | Company | Roles and Responsibilities |
|---------------------|--|---|
| 2016 – October 2018 | Imaginative Africa (Pty) Ltd <i>(Director of Imaginative Africa)</i> | Independent Consultant Consulting to various Environmental Assessment Practitioners for Public Participation and Stakeholder Engagements: <u>Tasks include:</u> Tasks include: Drafting of a Public Participation Plan with key deliverable dates and methodology to be followed, Background Information Document, Letters to Stakeholders and Interested and/or Affected Parties (I&APs) inclusive of key project deliverables and responses to questions / concerns raised; Stakeholder identification; facilitating stakeholder workshops, focus group and public meetings; conduct one-on-one consultation with Community Leaders, Tribal Chiefs, affected landowners, etc. Managing interaction between Stakeholders and Team Members, liaising with National, Provincial and Local Authorities, managing community consultation and communications in project affected areas, attend to the level of technical information communicated to and consultation with all level of stakeholders involved <u>Clients:</u> SiVEST Environmental Savannah Environmental Baagi Environmental Royal Haskoning DHV (previously SSI) |
| 2013 - 2016 | Zitholele Consulting Contact person: Dr Mathys Vosloo Contact number: 011 207 2060 | Senior Public Participation Practitioner and Project Manager <u>Tasks included:</u> Project managed public participation process for EIA/BA/WULA/EAL projects. Manages two Public Participation Administrators. Public Participation tasks as outlined as above and including financial management of public participation processes. |
| 2011 - 2013 | Imaginative Africa (Pty) Ltd <i>(company owned by Nicolene Venter)</i> | Independent Consultant Consulting to various Environmental Assessment Practitioners for Public Participation and Stakeholder Engagements <u>Tasks included:</u> Drafting of a Public Participation Plan with key deliverable dates and methodology to be followed, Background Information Document, |

| | | |
|--------------------|--|--|
| | | <p>Letters to Stakeholders and Interested and/or Affected Parties (I&APs) inclusive of key project deliverables and responses to questions / concerns raised; Stakeholder identification; facilitating stakeholder workshops, focus group and public meetings; conduct one-on-one consultation with Community Leaders, Tribal Chiefs, affected landowners, etc.</p> <p>Managing interaction between Stakeholders and Team Members, liaising with National, Provincial and Local Authorities, managing community consultation and communications in project affected areas, attend to the level of technical information communicated to and consultation with all level of stakeholders involved</p> <p><u>Clients:</u> Bohlweki Environmental Bembani Sustainability (Pty) Ltd Naledzi Environmental</p> |
| 2007 – 2011 | SiVEST SA (Pty) Ltd Contact person: Andrea Gibb Contact number: 011 798 0600 | Unit Manager: Public Participation Practitioner <u>Tasks included:</u> Project managed public participation process for EIA/BA projects. Manages two Junior Public Participation Practitioners. Public Participation tasks as outlined as above and including financial management of public participation processes. |
| 2005 – 2006 | Imaginative Africa (Pty) Ltd (company owned by Nicolene Venter) | Independent Consultant Public Participation and Stakeholder Engagement Practitioner <u>Tasks included:</u> Drafting of a Public Participation Plan with key deliverable dates and methodology to be followed, Background Information Document, Letters to Stakeholders and Interested and/or Affected Parties (I&APs) inclusive of key project deliverables and responses to questions / concerns raised; Stakeholder identification; facilitating stakeholder workshops, focus group and public meetings; conduct one-on-one consultation with Community Leaders, Tribal Chiefs, affected landowners, etc. Managing interaction between Stakeholders and Team Members, liaising with National, Provincial and Local Authorities, managing community consultation and communications in project affected areas, attend to the level of technical |

| | | |
|---------------------------|--|--|
| | | <p>information communicated to and consultation with all level of stakeholders involved.</p> <p><u>Clients:</u></p> <p>Manyaka-Greyling-Meiring (previously Greyling Liaison and currently Golder Associates)</p> |
| <p>1997 - 2004</p> | <p>Imaginative Africa (Pty) Ltd (company owned by Nicolene Venter)</p> | <p>Independent Consultant: Public Participation Practitioner.</p> <p><u>Tasks included:</u></p> <p>Drafting of a Public Participation Plan with key deliverable dates and methodology to be followed, Background Information Document, Letters to Stakeholders and Interested and/or Affected Parties (I&APs) inclusive of key project deliverables and responses to questions / concerns raised; Stakeholder identification; facilitating stakeholder workshops, focus group and public meetings; conduct one-on-one consultation with Community Leaders, affected landowners, etc.</p> <p>Managing interaction between Stakeholders and Team Members, liaising with National, Provincial Local Authorities, managing community consultation and communications in project affected areas, attend to the level of technical information communicated to and consultation with all level of stakeholders involved.</p> <p><u>Clients:</u></p> <p>Greyling Liaison (currently Golder Associates); Bemani Sustainability (Pty) Ltd; Lidwala Environmental; Naledzi Environmental</p> |

PROJECT EXPERIENCE

RENEWABLE POWER GENERATION PROJECTS

PHOTOVOLTAIC SOLAR ENERGY FACILITIES

Environmental Impact Assessments and Environmental Management Programmes

| Project Name & Location | Client Name | Role | |
|--|--|--|--|
| Lichtenburg PVs (3 PVs) & Power Lines (grid connection), Lichtenburg, North West Province | Atlantic Energy Partners EAP: Savannah Environmental | Project Manage the Public Participation Process Facilitate all meetings Consultation with Government Officials, Key Stakeholders, Landowners & Community Leaders | |
| Allepad PVs 4 PVs) & Power Lines (grid connection), Upington, Northern Cape Province | IL Energy EAP: Savannah Environmental | | |
| Hyperion Solar PV Developments (4 PVs) and Associated Infrastructures, Kathu, Northern Cape Province | Building Energy EAP: Savannah Environmental | | |
| Aggeneys Solar PV Developments (2 PVs) and Associated Infrastructures, Aggeneys, Northern Cape Province | Atlantic Energy Partners and ABO Wind EAP: Savannah Environmental | | |
| Upilanga Solar Park, Northern Cape (350MW CSP Tower) | Emvelo Capital Projects (Pty) Ltd | | |
| Khunab Solar Development, consisting of Klip Punt PV1, McTaggarts PV1, McTaggarts PV2, McTaggarts PV3 and the Khunab solar Grid Connection near Upington, Northern Cape Province | Atlantic Energy Partners and Abengoa | | |
| Sirius Solar PV3 and PV4, near Upington, Northern Cape Province | Solal | | |
| Geelster PV 1 and PV2 solar energy facilities, near Aggeneys, Northern Cape | ABO Wind | | |
| Naledi PV and Ngwedi PV solar energy facilities, near Upington, Northern Cape | Atlantic Energy Partners and Abengoa | | |
| Kotulo Tsatsi PV1, Kotulo Tsatsi PV3 and Kotulo Tsatsi PV4 solar energy facilities, near Kenhardt, Northern Cape | Kotulo Tsatsi Energy | | |
| Tlisitseng PV, including Substations & Power Lines, Lichtenburg, North West Province Sendawo PVs, including Substations & Power Lines, Vryburg, North West Province Helena Solar 1, 2 and 3 PVs, Copperton, Northern Cape Province | BioTherm Energy EAP: SiVEST | | Public Participation, Landowner and Community Consultation |
| Farm Spes Bona 23552 Solar PV Plants, Bloemfontein, Free State Province | Surya Power EAP: SiVEST | | Public Participation, Landowner and Community Consultation |
| De Aar Solar Energy Facility, De Aar, Northern Cape Province | South Africa Mainstream Renewable Power Developments EAP: SiVEST | Public Participation, Landowner and Community Consultation | |
| Droogfontein Solar Energy Facility, Kimberley, Northern Cape Province | | | |
| Kaalspruit Solar Energy Facility, Loeriesfontein, Northern Cape Province | | | |

| | | |
|--|---|--|
| Platsjambok East PV, Prieska, Northern Cape Province | | |
| Renosterburg PV, De Aar, Northern Cape Province | Renosterberg Wind Energy Company EAP: SiVEST | Public Participation, Landowner and Community Consultation |
| 19MW Solar Power Plant on Farm 198 (Slypklip), Danielskuil, Northern Cape Province | Solar Reserve South Africa EAP: SiVEST | Public Participation, Landowner and Community Consultation |

Basic Assessments and Environmental Management Programmes

| Project Name & Location | Client Name | Role |
|---|--------------------------------------|---|
| Upilanga Solar Park, Northern Cape (x6 100MW PV's and x3 350MW PV Basic Assessments) | Emvelo Capital Projects (Pty) Ltd | Project Manage the Public Participation Process Facilitate all meetings Consultation with Government Officials, Key Stakeholders, Landowners & Community Leaders |
| Sirius Solar PV Solar Energy Facility, Upington, Northern Cape Province | SOLA Future Energy | |
| Khunab Solar Development, consisting of Klip Punt PV1, McTaggart PV1, McTaggart PV2, McTaggart PV3 and the Khunab solar Grid Connection near Upington, Northern Cape Province | Atlantic Energy Partners and Abengoa | |

WIND ENERGY FACILITIES

Environmental Impact Assessments and Environmental Management Programmes

| Project Name & Location | Client Name | Role |
|---|---|----------------------|
| Aletta Wind Farm, Copperton, Northern Cape Province | BioTherm Energy EAP: SiVEST | Public Participation |
| Eureka Wind Farm, Copperton, Northern Cape Province | | |
| Loeriesfontein Wind Farm, Loeriesfontein, Northern Cape Province | South Africa Mainstream Renewable Power Developments EAP: SiVEST | Public Participation |
| Droogfontein Wind Farm, Loeriesfontein, Northern Cape Province | | |
| Four Leeuwberg Wind Farms, Loeriesfontein, Northern Cape Province | | |
| Noupoort Wind Farm, Noupoort, Northern Cape Province | | |
| Mierdam PV & Wind Farm, Prieska, Northern Cape Province | | |
| Platsjambok West Wind Farm & PV, Prieska, Northern Cape Province | | |

Basic Assessments and Environmental Management Programmes

| Project Name & Location | Client Name | Role |
|---|-------------|------|
| Cluster of Renewable Energy Developments, Eastern Cape Province | Wind Relic | |

| | | |
|---|--|--|
| Nama Wind Energy Facility, Northern Cape Province | Genesis ECO EAP: Savannah Environmental | Project Manage the Public Participation Process Facilitate all meetings Consultation with Government Officials, Key Stakeholders, Landowners & Community Leaders |
| Zonnequa Wind Energy Facility, Northern Cape Province | | |

CONCENTRATED SOLAR FACILITIES (CSP)

Environmental Impact Assessments and Environmental Management Programmes

| Project Name & Location | Client Name | Role |
|---|---|--|
| Upington Concentrating Solar Plant and associated Infrastructures, Northern Cape Province | Eskom Holdings EAP: Bohlweki Environmental | Project Manage the Public Participation Process Facilitate all meetings Consultation with Government Officials, Key Stakeholders, Landowners & Community Leaders |

CONVENTIONAL POWER GENERATION PROJECTS (GAS)

Environmental Impact Assessments and Environmental Management Programmes

| Project Name & Location | Client Name | Role |
|---|----------------------------|---|
| 450MW gas to power project and associated 132kV power line, Richards bay, KwaZulu-Natal | Phinda Power Producers | Project Manage the Public Participation Process Facilitate all meetings Consultation with Government Officials, Key Stakeholders & Landowners |
| 4000MW gas to power project and associated 400kV power lines, Richards bay, KwaZulu-Natal | Phinda Power Producers | |
| Richards Bay Gas to Power Combined Cycle Power Station, KwaZulu-Natal | Eskom Holdings SoC Limited | |

GRID INFRASTRUCTURE PROJECTS

Environmental Impact Assessments and Environmental Management Programmes

| Project Name & Location | Client Name | Role |
|--|--|--|
| 132/11kV Olifantshoek Substation and Power Line, Northern Cape | Eskom | Project Manage the Public Participation Process Facilitate all meetings Consultation with Government Officials, Key Stakeholders, Landowners & Community Leaders |
| Grid connection infrastructure for the Namas Wind Farm, Northern Cape Province | Genesis Namas Wind (Pty) Ltd | |
| Grid connection infrastructure for the Zonnequa Wind Farm, Northern Cape Province | Genesis Zonnequa Wind (Pty) Ltd | |
| Khunab Solar Grid Connection, near Upington, Northern Cape Province | Atlantic Energy Partners and Abengoa | |
| Pluto-Mahikeng Main Transmission Substation and 400kV Power Line (Carletonville to Mahikeng), Gauteng and North West Provinces | Eskom Holdings EAP: Baagi Environmental | |
| Thyspunt Transmission Lines Integration Project, Eastern Cape Province | Eskom Holdings EAP: SIVEST | |
| Westrand Strengthening Project, Gauteng Province | | Public Participation, |

| | | |
|---|--|--|
| Mookodi Integration Project, North-West Province | | |
| Transnet Coallink, Mpumalanga and KwaZulu-Natal Provinces | | |
| Delarey-Kopela-Phahameng Distribution power line and newly proposed Substations, North-West Province | | Public Participation, Landowner and Community Consultation |
| Invubu-Theta 400kV Eskom Transmission Power Line, KwaZulu-Natal Province | Eskom Holding EAP: Bemani Environmental | |
| Melkhout-Kudu-Grassridge 132kV Power Line Project (project not submitted to DEA), Eastern Cape Province | Eskom Holdings EAP: SIVEST | Public Participation, Landowner and Community Consultation |
| Tweespruit-Welroux-Driedorp-Wepener 132Kv Power Line, Free State Province | | |
| Kuruman 132Kv Power Line Upgrade, Northern Cape Province | Eskom Holdings EAP: Zitholele | |
| Vaalbank 132Kv Power Line, Free State Province | | |
| Pongola-Candover-Golela 132kV Power Line (Impact Phase), KwaZulu-Natal Province | | |

PART 2 AMENDMENTS

| Project Name & Location | Client Name | Role |
|---|--------------------------------------|---|
| Transalloys Coal-Fired Power Station near Emalahleni, Mpumalanga Province | Transalloys (Pty) Ltd | Project Manage the Public Participation Process |
| Zen Wind Energy Facility, Western Cape | Energy Team (Pty) Ltd | |
| Hartebeest Wind Energy Facility, Western Cape | juwi Renewable Energies (Pty) Ltd | |
| Khai-Ma and Korana Wind Energy Facilities | Mainstream Renewable Power (Pty) Ltd | |

FACILITATION

| Project Name & Location | Client Name | Meeting Type |
|--|---|--|
| Bloemfontein Strengthening Project, Free State Province | Eskom Holdings EAP: Baagi Environmental | Public Meetings |
| Moodraai-Smitkloof 132kV Power Line and Substation, Northern Cape Province | Eskom Holdings EAP: SSI | Focus Group Meetings |
| Aggeneis-Oranjemond 400kV Eskom Transmission Power Line, Northern Cape Province | Eskom Holdings EAP: Savannah Environmental | Focus Group Meetings & Public Meetings |
| Ariadne-Eros 400kV/132kV Multi-Circuit Transmission Power Line (Public Meetings) | Eskom Holdings EAP: ACER Africa | Public Meetings |
| Majuba-Venus 765kV Transmission Power Lines, Mpumalanga Province | | |
| Thabametsi IPP Power Station, Limpopo Province | Thabametsi Power Company EAP: Savannah Environmental | Focus Group Meeting & Public Meeting |
| Aggeneis-Oranjemond Transmission Line & Substation Upgrade, Northern Cape | Eskom Transmission | Focus Group Meetings & Public Meetings |

SCREENING STUDIES

| Project Name & Location | Client Name | Role |
|--|--|-------------------|
| Potential Power Line Alternatives from Humansdorp to Port Elizabeth, Eastern Cape Province | Nelson Mandela Bay Municipality EAP: SiVEST | Social Assessment |

ASH DISPOSAL FACILITIES

Environmental Impact Assessments and Environmental Management Programmes

| Project Name & Location | Client Name | Role |
|--|--|---|
| Medupi Flue Gas Desulphurisation Project (up to completion of Scoping Phase), Limpopo Province | Eskom Holdings SOC Ltd EAP: Zitholele Consulting | Public Participation, Landowner and Community Consultation |
| Kendal 30-year Ash Disposal Facility, Mpumalanga Province | | |
| Kusile 60-year Ash Disposal Facility, Mpumalanga Province | | |
| Camden Power Station Ash Disposal Facility, Mpumalanga Province | | |
| Tutuka Fabric Filter Retrofit and Dust Handling Plant Projects, Mpumalanga Province | Eskom Holdings SOC Ltd EAP: Lidwala Environmental | |
| Eskom's Majuba and Tutuka Ash Dump Expansion, Mpumalanga Province | | |
| Hendrina Ash Dam Expansion, Mpumalanga Province | | |

INFRASTRUCTURE DEVELOPMENT PROJECTS (BRIDGES, PIPELINES, ROADS, WATER RESOURCES, STORAGE, ETC)

Basic Assessments

| Project Name & Location | Client Name | Role |
|--|--|---|
| Expansion of LOX and Diesel Storage at the Air Products Facility in Coega, Eastern Cape | Air Products South Africa (Pty) Ltd | Project Manage the Public Participation Process Facilitate all meetings Consultation with Government Officials, Key Stakeholders & Landowners |
| Transnet's New Multi-Products Pipeline traversing Kwa-Zulu Natal, Free State and Gauteng Provinces | Transnet EAP: Bohlweki Environmental | |
| Realignment of the Bulshoek Dam Weir near Klaver and the Doring River Weir near Clanwilliam, Western Cape Province | Dept of Water and Sanitation EAP: Zitholele | Public Participation |

STAKEHOLDER ENGAGEMENT

| Project Name & Location | Client Name | Role |
|--|--------------------|--|
| Socio-Economic Impact Study for the shutdown and repurposing of Eskom Power Stations: Komati Power Station, Hendrina Power Station & Grootvlei Power Station | Urban-Econ | Project Management for the stakeholder engagement with Community |

| | | |
|---|--|--|
| | | Representatives in the primary data capture area |
| First State of Waste Report for South Africa | Golder Associates on behalf of the Department of Environmental Affairs | Secretarial Services |
| Determination, Review and Implementation of the Reserve in the Olifants/Letaba System | Golder Associates on behalf of the Department of Water and Sanitation | |
| Orange River Bulk Water Supply System | | |
| Levuvu-Letaba Resources Quality Objectives | | |

FACILITATION

| Project Name & Location | Client Name | Meeting Type |
|--|--|----------------------|
| Determination, Review and Implementation of the Reserve in the Olifants/Letaba System | Department of Water and Sanitation | Secretarial Services |
| Orange River Bulk Water Supply System | Golder Associates | Secretarial Services |
| Levuvu-Letaba Resources Quality Objectives | | Secretarial Services |
| SmancorCR Chemical Plant (Public Meeting), Gauteng Province | Samancor Chrome (Pty) Ltd EAP: Environmental Science Associates | Public Meeting |
| SANRAL N4 Toll Highway Project (2 nd Phase), Gauteng & North West Provinces | Department of Transport EAP: Bohlweki Environmental | Public Meetings |

MINING SECTOR

Environmental Impact Assessment and Environmental Management Programme

| Project Name & Location | Client Name | Role |
|--|---|---|
| Zero Waste Recovery Plant at highveld Steel, Mpumalanga Province | Anglo African Metals EAP: Savannah Environmental | Public Participation |
| Koffiefontein Slimes Dam, Free State Province | Petra Diamond Mines EAP: Zitholele | Public Participation |
| Baobab Project: Ethenol Plant, Chimbanje, Middle Sabie, Zimbabwe | Applicant: Green Fuel EAP: SIVEST | Public Participation & Community Consultation |
| BHP Billiton Energy Coal SA's Middelburg Water Treatment Plant, Mpumalanga | BHP Billiton Group EAP: Jones & Wagener | Public Participation |

ENVIRONMENTAL AUTHORISATION AMENDMENTS

| Project Name & Location | Client Name | Role |
|--|---|----------------------|
| Transalloys Coal-Fired Power Station near Emalahleni, Mpumalanga Province | Transalloys (Pty) Ltd | Public Participation |
| Zen Wind Energy Facility, Western Cape | Energy Team (Pty) Ltd | |
| Hartebeest Wind Energy Facility, Western Cape | juwi Renewable Energies (Pty) Ltd | |
| Khai-Ma and Korana Wind Energy Facilities | Mainstream Renewable Power (Pty) Ltd | |
| Beaufort West 280MW Wind Farm into two 140MW Trakas and Beaufort West Wind Farms, Western Cape | South Africa Mainstream Renewable Power Developments EAP: SIVEST | |

SECTION 54 AUDITS

| Project Name & Location | Client Name | Role |
|--|--------------------------------|--|
| Mulilo 20MW PV Facility, Prieska, Northern Cape | Mulilo (Pty) Ltd | Public Participation: I&AP Notification process |
| Mulilo 10MW PV Facility, De Aar, Northern Cape | Mulilo (Pty) Ltd | |
| Karoshhoek CSP 1 Facility/ Solar One, Upington, Northern Cape | Karoshhoek Solar One (Pty) Ltd | |

CURRICULUM VITAE OF DEBBIE-LEE JANSE VAN RENSBURGXXXX

Comprehensive CV

| | |
|-------------------------|--|
| Profession : | Junior Environmental Consultant |
| Specialisation: | Environmental Management; Environmental Impact Assessments; Basic Assessments; Water licencing; Project related GIS mapping; Public Participation Administration and Compliance Auditing |
| Work Experience: | Eight (8) Months in the GIS and Environmental Field |

VOCATIONAL EXPERIENCE

Debbie-Lee is a highly dedicated, hardworking, goal orientated individual who does everything to the best of her ability. She studied BA Psychology with Geography, and Environmental Management for 3 years, she also completed her BSc. Honours degree in Environmental Science with Geography and Environmental Management at the North West University, Potchefstroom Campus.

After Debbie-Lee completed her 4 years of studies. She started her career at a GIS company where she worked as a Geospatial Technician. Her role as Geospatial Technician 1 taught her a lot about GIS and ArcMap. Typical tasks for which she was responsible in her role include the following: Review and analyse GIS data; maps and graphs; create data reports and digital 3D models of terrain; gather and convert data for GIS mapping; and plot maps for projects.

She has a special interest in environmental management with a specific focus on

- Renewable energy,
- Mining,
- Water management,
- GIS,
- Environmental auditing,
- Public participation,
- Environmental authorisation processes (EIA, BA, etc.)

With the aim of learning as much as possible, Debbie-Lee believes that she can learn from fellow colleagues as well as clients on a daily basis so that she can apply the knowledge she gains in her day-to-day tasks as an environmental consultant.

SKILLS BASE AND CORE COMPETENCIES

- Planning and Organising
- Compilation of Basic Assessment Reports in compliance with environmental legislation
- Self-discipline
- Aiding with public participation processes
- Passionate about the environment
- Goal orientated
- Good analytical and organisational skills
- Project management for environmental-related events and projects
- Working under pressure
- Experience with South African environmental legislation
- Eager to learn new skills
- Result orientated
- Water use licenses
- Environmental Authorisations and amendments
- Analysis and manipulation of geographical information and technical experience with the use of ArcGIS
- Teamwork
- Communication

EDUCATION AND PROFESSIONAL STATUS

Degrees:

- BSc. Hons. in Environmental Science with Geography and Environmental Management, North-West University Potchefstroom (2021)
- BA in Psychology, Geography and Environmental Management, North-West University Potchefstroom (2020)

Short Courses:

- 3D Visualization Techniques Using ArcGIS (2021)
- 3D analysis of Surfaces and Features Using ArcGIS (2021)
- Deriving Raster for Terrain Analysis Using ArcGIS (2021)
- Distance Analysis Using ArcGIS (2021)
- Training and Resources in Research Ethics and Evaluation (THREE) (2021)

EMPLOYMENT

| Date | Company | Roles and Responsibilities |
|-------------------------------|-------------------------------------|--|
| July 2022 - Current: | Savannah Environmental (Pty) Ltd | <i>Junior Environmental Consultant</i> <u>Tasks include:</u> <i>Environmental Assessment Practitioner (EAP); Specialising in project-related GIS mapping. Performing Basic Assessment Reports and Environmental Impact Assessments, Assisting on administrative public participation documents</i> |
| March 2022 – July 2022 | Southern Mapping Company – Woolpert | <i>Geospatial Technician 1</i> <u>Tasks included:</u> <i>Review and analyse GIS data, maps and graphs; create data reports and digital 3D models of terrain. Gather and convert data for GIS mapping, plot maps for projects.</i> |

PROJECT EXPERIENCE

RENEWABLE POWER GENERATION PROJECTS: SOLAR ENERGY FACILITIES

Environmental Impact Assessments and Environmental Management Programmes

| Project Name & Location | Client Name | Role |
|---|------------------------|--|
| 3x Sibanye Stillwater Cluster, North West | Sibanye Stillwater PGM | Junior Environmental Consultant & GIS Specialist |

Basic Assessments

| Project Name & Location | Client Name | Role |
|---|-----------------------|--|
| Kleinsee PV and grid connection facilities, Northern Cape | Energy Team (Pty) Ltd | Junior Environmental Consultant & GIS specialist |

Environmental Permitting, S53, Water Use Licence (WUL), Waste Management Licence (WML) & Other Applications

| Project Name & Location | Client Name | Role |
|--|----------------------|-------------|
| Kotulo Tsatsi Energy PV1 and PV2 Part 1 Amendment, Northern Cape | Kotulo Tsatsi Energy | Junior EAP |

GRID INFRASTRUCTURE PROJECTS

Basic Assessments

| Project Name & Location | Client Name | Role |
|------------------------------------|--------------------|---|
| Pixley Park EGI, Northern Cape | Mulilo | Junior Environmental Consultant & GIS specialists |

INFRASTRUCTURE DEVELOPMENT PROJECTS (BRIDGES, PIPELINES, ROADS, WATER RESOURCES, STORAGE, ETC)

Basic Assessments

| Project Name & Location | Client Name | Role |
|---------------------------------------|-----------------------------------|---------------------------------|
| Witberg WEF Access Road, Western Cape | Red Rocket South Africa (Pty) Ltd | Junior Environmental Consultant |