
RED SANDS PV1 NORTHERN CAPE PROVINCE

ENVIRONMENTAL MANAGEMENT PROGRAMME

April 2022

Prepared for

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PROJECT DETAILS

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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.

Disturbing 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 Environmental Affairs) 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 EMP 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: 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).

Site Ecological Importance (SEI): is a function of the Biodiversity Importance (BI) of the receptor (e.g., SCC, the vegetation/fauna community or habitat type present on the site) and Receptor Resilience (RR) (its resilience to impacts). An understanding of residual risk to SEI is important in determining acceptability of impact

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:

BA	Basic Assessment
BAR	Basic Assessment Report
DFFE	Department of Forestry, Fisheries and the Environment
dB	Decibels
DAEARDLR	Northern Cape Department Agriculture, Environmental Affairs, Rural Development and Land Reform
DMRE	Department of Mineral Resources, and Energy
EAP	Environmental Impact 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
kV	Kilo Volt
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
NWA	National Water Act
PM	Post Meridiem; "Afternoon"
SAHRA	South African National Heritage Resources Agency
SWMP	Stormwater Management Plan

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CHAPTER 1: INTRODUCTION

This Environmental Management Programme (EMPr) has been compiled for AGV Projects (Pty) Ltd (the developer/proponent) for the development of the Red Sands PV1 facility and associated infrastructure. The project is proposed on Portion 2 of the Farm Tities Poort 386 (project), which is located approximately 26km north-east of the town of Groblershoop, within the Tsantsabane Local Municipality and the ZF Mgcawu District Municipality in the Northern Cape Province.

Red Sands PV1 will be designed to have a contracted capacity of 75MW_{AC} and will make use of either fixed-tilt or tracking photovoltaic (PV) solar technology for the generation of electricity. This EMPr has been developed on the basis of the findings of the Basic Assessment (BA), 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 developer 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. Any updates must be undertaken in accordance with the requirements of the relevant legislation. This document fulfils the requirement of the EIA Regulations, 2014 (as amended) and forms part of the BA Report for the project.

CHAPTER 2: PROJECT DETAILS

AGV Projects (Pty) Ltd is proposing the development of a solar PV facility and associated infrastructure on a site located approximately 26km northeast of Groblershoop, within the Tsantsabane Local Municipality and the ZF Mgcawu District Municipality in the Northern Cape Province. The project is to be known as Red Sands PV1 and will have a contracted capacity of up to 75MW.

A preferred project site with an extent of ~7023ha and a development area of ~163ha within the project site has been identified by AGV Projects (Pty) Ltd as a technically suitable area for the development of the Red Sands PV1 facility. The development area for the PV facility is located on Portion 2 of the Farm Tities Poort 386. The project site is accessible via an existing gravel farm road from an existing main gravel road off the N8 which is located southeast of the project site.

The table below provides an overview of the Red Sands PV1 facility. The key infrastructure components associated with the development of Red Sands PV1 are described in greater detail within Chapter 3 of this BA Report.

Table 2.1: Overview of the Red Sands PV1 development area

Province	Northern Cape Province
District Municipality	ZF Mgcawu District Municipality
Local Municipality	!Kheis Local Municipality
Ward number(s)	Ward 6
Nearest town(s)	Groblershoop (26km)
Affected property of the PV development area: Farm name(s), number(s) and portion numbers	Portion 2 of the Farm Tities Poort 386
SG 21 Digit Code (s)	C02800000000038600002
Current zoning of the study area	Agricultural (grazing)
Site Co-ordinates (corner co-ordinates of PV1)	Corner 1: 28°40'12.55"S 22° 5'29.08"E Corner 2: 28°37'12.13"S 22°10'20.14"E Corner 3: 28°41'17.75"S 22°12'8.10"E Corner 4: 28°43'55.65"S 22° 9'16.98"E

2.2 Project Description

The project will comprise the following key infrastructure and components:

- » Solar PV array comprising PV modules and mounting structures.
- » Inverters and transformers.
- » Low voltage cabling between the PV modules to the inverters
- » Fence around the project development area
- » Camera surveillance
- » Internet connection
- » 33kV cabling between the project components and the facility substation

- » 33/132kV onsite facility substation¹.
- » Battery Energy Storage System (BESS).
- » Site offices and maintenance buildings, including workshop areas for maintenance and storage.
- » Laydown areas.
- » Access roads (up to 6m) and internal distribution roads (up to 4m).

Table 2.2 provides the details of Red Sands PV1, including the main infrastructure components and services that will be required during the project life cycle.

Table 2.2: Overview of the project and associated infrastructure for Red Sands PV1

Total extent of the Development area (including associated infrastructure)	~163ha
Contracted capacity of the facility	75MW AC
Technology	Static or Tracking Photovoltaic Systems
PV panels	<ul style="list-style-type: none"> » Height: ~2.2m from ground level (installed). » 197 100 panels required. » Fixed tilt, single axis or double axis tracking systems.
Grid connection	On-site inverter (step up facility) to convert power from Direct Current (DC) to an Alternative (AC) and step up the electricity current from 11kV to 132kV that will connect to the on-site substation via underground cables. As part of a separate BA process, the electricity will be evacuated via a switching station and 132kV power line to the existing Garona substation.
Site access	Direct access to the broader study area and the development area is provided by the existing gravel roads running from the N8. Access roads will be up to 6m and internal distribution roads up to 4m.
Other infrastructure	<ul style="list-style-type: none"> » Fence around the project development area » Camera surveillance » Internet connection » Battery Energy Storage System (BESS) (within substation footprint). » Site offices and maintenance buildings, including workshop areas for maintenance and storage. » Laydown areas.
Services required	<ul style="list-style-type: none"> » Refuse material disposal - all refuse material generated from the proposed development will be collected by a contractor and will be disposed of at a licensed waste disposal site off site. This service will be arranged with the municipality and suitable contractors when required. » Sanitation – all sewage waste will be collected by a contractor and will be disposed of at a licensed waste disposal site during the construction phase. This service will be arranged with the municipality when required during the operational phase.

¹ A 132kV powerline will be assessed through a separate Basic Assessment Process

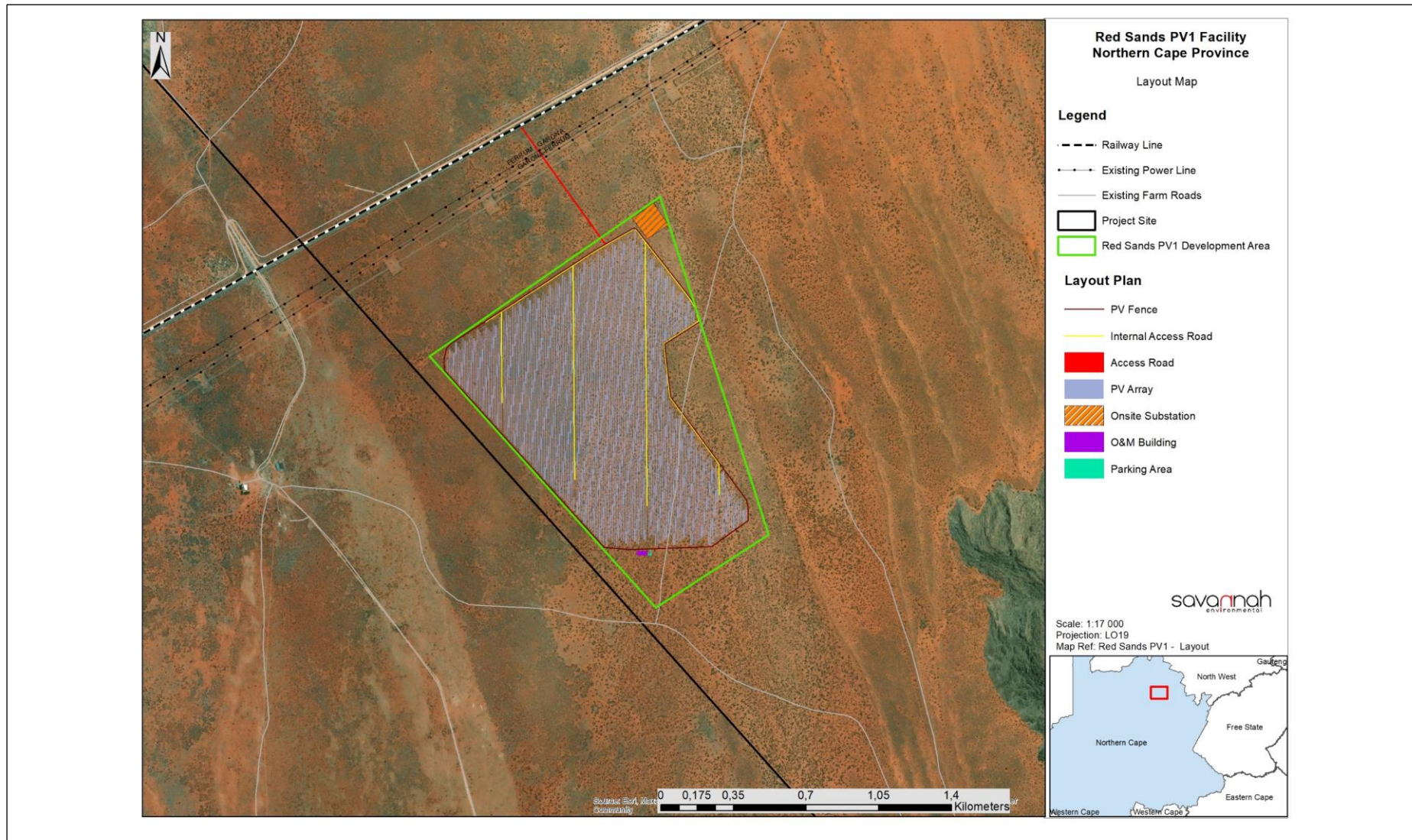


Figure 2.1: Layout of the Red Sands PV1 facility and associated infrastructure

2.3. Life-cycle Phases of Red Sands PV1

<u>Pre-construction</u>	
Requirements	» Planning and Design of facility
Activities to be undertaken	
Site preparation	<ul style="list-style-type: none"> » Confirming the integrity of site access to accommodate the required equipment. » Preparation of the site (e.g. laydown areas). » Mobilisation of construction equipment.
Conduct surveys prior to construction	» Including, but not limited to: a detailed site survey and confirmation of the infrastructure micro-siting footprint, survey of the on-site substation site and O&M building area to determine and confirm the locations of all associated infrastructure.
<u>Construction Phase</u>	
Requirements	<ul style="list-style-type: none"> » Project requires Environmental Authorisation from DFFE, a generation license issued by NERSA. » Duration expected to be up to 12 months for the Red Sands PV1. » Create direct construction employment opportunities: Up to 350 jobs (at peak of construction) created and maintained for approximately two and a half years. » Security staff will also be present during the night-time of the construction phase. » Waste removal and sanitation will be undertaken by a sub-contractor or the municipality, where possible. Waste containers, including containers for hazardous waste, will be located at easily accessible locations on site when construction activities are undertaken. » Electricity required for construction activities will be generated by a generator or will be sourced from available 11kV or 22kV Eskom distribution networks in the area. » Water will be required for the construction phase, which will be approximately 8 290m³ total for the construction activities. Water will be sourced from existing boreholes in the area, new boreholes or a pipeline from the Orange River. Hydrocensus will determine best option (In process)..
Activities to be undertaken	
Establishment of access roads to the Site	<ul style="list-style-type: none"> » Access/haul roads and internal access roads within the site will be established at the commencement of construction. » Existing access roads will be utilised where possible to minimise impact and upgraded where required. » Access roads to the site will have a width of up to 6m. » Access roads to be established between the project components for construction and/or maintenance activities within the development footprint. » Internal service road alignment will be approximately 4m wide.
Undertake site preparation	<ul style="list-style-type: none"> i) Including the clearance of vegetation at the footprint of each support structure, establishment of the laydown areas, the establishment of internal access roads and excavations for foundations. ii) Stripping of topsoil to be stockpiled, backfilled, removed from site and/or spread on site.

	<ul style="list-style-type: none"> iii) To be undertaken in a systematic manner to reduce the risk of exposed ground being subjected to erosion. iv) Include search and rescue of floral Species of Conservation Concern (where required) and the identification and excavation of any sites of cultural/heritage value (where required).
Establishment of laydown areas and batching plant on site	<ul style="list-style-type: none"> » A laydown area for the storage of project components, including the PV panels and civil engineering construction equipment. » The laydown area will also accommodate building materials and equipment associated with the construction of buildings. » Infilling or depositing materials will be sourced from licenced borrow pits within the surrounding areas, which have been authorised independently to the Red Sands PV1 BA process.
Transport of components and equipment to and within the site	<ul style="list-style-type: none"> » Transportation will take place via appropriate National and Provincial roads, and the dedicated access/haul road to the site. » Some of the components (i.e. substation transformer) may be defined as abnormal loads in terms of the Road Traffic Act (Act No. 29 of 1989) by virtue of the dimensional limitations. » Typical civil engineering construction equipment will need to be brought to the 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 substation and site preparation.
Erect PV Panels and Construct Substation, Inverters	<ul style="list-style-type: none"> » Installation of the solar PV panels and the structural and electrical infrastructure to make the plant operational. » For array installation, typically vertical support posts/piles are driven into the ground. Depending on the results of the geotechnical investigation a different foundation method may be required. Different options include a screw pile, helical pile, micro-pile or drilled post/pile which may or may not need to be cast in concrete underground at an appropriate depth as determined by the Geotechnical investigation. The posts will hold the support structures (tables) on which PV arrays would be mounted. Brackets attach the PV modules to the tables. <div data-bbox="454 845 1498 1230" data-label="Image"> </div> <ul style="list-style-type: none"> » Trenches are dug for the underground AC and DC cabling and the foundations of the inverter enclosures and transformers are prepared. » Wire harnesses connect the PV modules to the electrical collection systems.
Construction of the substation and BESS	<ul style="list-style-type: none"> » One on-site substation to be constructed within the development footprint. » Substation will be constructed with a high-voltage yard footprint.

	» The BESS will be constructed as part onsite substation and will require a survey of the footprint, site clearing and levelling. For solid state batteries, the battery cell packs (containing an electrolyte solution) will be brought to site as sealed units which will be installed and connected on site.
Establishment of ancillary infrastructure	<ul style="list-style-type: none"> » Operation and Maintenance buildings including a gate house, security building, control centre, offices, warehouses, a workshop and visitors centre. » Temporary staff accommodation is required for the duration of construction. » Establishment will require the clearing of vegetation, levelling and the excavation of foundations prior to construction.
Connection of PV facility to the onsite substation	<ul style="list-style-type: none"> » Underground cables and overhead circuits connect the string inverters to the on-site AC electrical infrastructure (central inverter) and ultimately the project's on-site substation. » Excavation of trenches are required for the installation of the cables. Trenches will be approximately 1.2m deep. » Underground cables are planned to follow the internal access roads, as far as possible.
Connect substation to the power grid	1. A 132/33kV on-site collector substation to be connected to the Garona Substation via a new 132kV overhead power line (subject to separate authorisation process).
Undertake site rehabilitation	<ol style="list-style-type: none"> 1. Commence with rehabilitation efforts once construction is completed in an area, and all construction equipment is removed. 2. On commissioning, access points to the site that will not be required for the operation phase will be closed and prepared for rehabilitation.
<u>Operation Phase</u>	
Requirements	<ul style="list-style-type: none"> » Duration will be 20-25 years, or longer depending on need for the project. » Requirements for security and maintenance of the facility. » Employment opportunities relating mainly to operation activities and maintenance. Up to 20 full-time and 60 temporary direct employment opportunities will be available. » Water will be required for the operation phase. Approximately 1000m³ of water per annum will be required for the cleaning of the PV modules. Water will be sourced from existing boreholes in the area or municipal supply. » Current land-use activities being undertaken within the project site can continue during the operation of the PV facility.
Activities to be undertaken	
Operation and Maintenance	<ul style="list-style-type: none"> » Full time security, maintenance and control room staff. » PV facility will be operational except under circumstances of mechanical breakdown, inclement weather conditions, or maintenance activities. » PV facility to be subject to periodic maintenance and inspection. » Disposal of waste products (e.g. oil) in accordance with relevant waste management legislation. » Areas which were disturbed during the construction phase to be utilised should a laydown area be required during operation. » PV panels will be washed during operation utilising clean water or non-hazardous biodegradable cleaning products. Wastewater generated by washing can be allowed to run-off under the panels.
<u>Decommissioning Phase</u>	
Requirements	» Decommissioning of the Red Sands PV Facility infrastructure at the end of its economic life.

	<ul style="list-style-type: none"> » Potential for repowering of the facility, depending on the condition of the facility at the time. » Expected lifespan of approximately 20 - 25 years (with maintenance) before decommissioning is required. » Decommissioning activities to comply with the legislation relevant at the time.
Activities to be undertaken	
Site preparation	<ul style="list-style-type: none"> » Confirming the integrity of site access to accommodate the required equipment. » Preparation of the site (e.g. laydown areas and construction platform). » Mobilisation of equipment required for decommissioning.
Disconnect, Disassemble and remove solar facility components	<ul style="list-style-type: none"> » Disconnect the facility from the grid. » Dismantle all panels, mounting structures and foundations in line with all relevant legislation. » Recycle, repurpose and re-use as much of the decommissioned project components as possible in accordance with regulatory requirements. » Concrete foundations will be removed to a depth as defined by an agricultural specialist. » Backfill the mounting structure holes and rehabilitate the area appropriately. » Visible cables will be removed. » Access roads will either be left for use by landowners/future landowners, or covered with topsoil or reduced in width. » A final site walkthrough will be conducted to remove debris and/or waste generated within the site during the decommissioning process. » Rehabilitation may include top soiling, raking, and/or re-seeding (whichever is appropriate).

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2.4 Findings of the Basic Assessment

The Ecological Importance of the development area is regarded as High, specifically from an avian biodiversity and habitat perspective. However, the location of the development area has achieved an acceptable extent of avoidance within the project site, which will not result in unacceptable residual impacts. No environmental fatal flaws were identified in the detailed specialist studies conducted, and no impacts of unacceptable significance are expected to occur with the implementation of the recommended mitigation measures. These measures include, amongst others, the avoidance of sensitive features and the undertaking of monitoring, as specified by the specialists.

From the specialist studies undertaken it was determined that soils and agricultural aspects did not require any further assessment (refer to **Appendix F of the BA Report**). The Red Sands PV1 development area is not associated with any arable soils, due to the type of soil as well as the climate, which limits crop production significantly. The land capabilities associated with the development area are only suitable for grazing, which corresponds with the current land use. It is the specialist's opinion that the proposed developments will have no impacts on the agricultural production ability of the land. Therefore, the proposed development may be favourably considered for a soils and agricultural perspective.

The potential environmental impacts associated with Red Sands PV1 identified and assessed through the BA process include:

- » Impacts on ecology, flora and fauna.
- » Impacts on avifauna.
- » Impacts on heritage resources, including archaeology and palaeontology.
- » Visual impacts on the area imposed by the components of the facility.
- » Positive and negative social impacts.

2.4.1 Impacts on Ecology

The development area is located within an area classified as "Other natural areas" and has not been classified as a Critical Biodiversity Area (CBA) or an Ecological Support Area (ESA). The habitat present within the development area is not diverse and considered to be homogenous. However, based on the ecological condition and the diversity of mesocarnivores, the area possesses biodiversity value. Sensitivity in terms of terrestrial flora and fauna is considered to be low to moderate. The site ecological importance (SEI) was determined to be 'High' based on the potential for occurrence of a globally VU species, the extent of the area considered and its connectivity to natural areas within the landscape (**Appendix D of BA Report**). However, the project development is considered as acceptable given the extent of avoidance achieved in relation to the remaining High and Very High areas within the project site, and the medium residual impacts remaining after mitigation.

2.4.2 Impacts on Avifauna

A total of eighty-five (85) bird species have been recorded within the broader project site and surrounds (**Appendix E of BA Report**). Two of the species recorded were species of conservation concern, on a national or international scale namely the Cape Vulture and Verreaux's Eagle. A number of species recorded are

protected under the NC Conservation Act of 2009 (schedule 2), however three species are being highlighted here, the Pygmy Falcon (due to the nest found) as well as the Northern Black Korhaan and the Red Crested Korhaan (due to their small territories). A Pygmy Falcon nest were found at the water trough, just to the east of the project footprint.

The main expected impact of the proposed Red Sands PV1 will be the loss of habitat, loss of nesting sites and emigration of avifauna. Based on the outcomes of the site ecological importance (SEI) determination, the project possesses a 'High' SEI. However, the location of the development area has achieved an acceptable extent of avoidance within the project site, which will not result in unacceptable residual impacts. The development is therefore considered to be acceptable. It is recommended that should any future developments be proposed for the remaining extent of the 'High' and 'Very High' areas within the project site, that compensation strategies be required for these authorisations.

2.4.5 Impacts on Heritage Resources (including archaeology and palaeontology)

No significant heritage resources were identified within the development area for Red Sands PV1 (**Appendix G of BA Report**). All of the archaeological resources (Middle and Late Stone Age) identified within the areas proposed for the development of the Red Sands PV1 have been determined to be not conservation worthy. As such, these resources have been sufficiently recorded and there is no objection to the development of the proposed PV facility in these locations from an archaeological perspective.

One archaeological site of significance was identified, Red Sands-045 and Red Sands-046 (both sites form part of one continuous scatter of artefacts), outside the development area. Although no impact is anticipated, it is recommended that this site is demarcated on relevant development maps and that a no-go buffer of 100m is implemented around this site.

Based on the nature of the heritage resources identified and the lack of any fossils recorded or expected in the area, the significance of the impacts on heritage and palaeontological resources will be low, with the implementation of the recommended mitigation measures. As such, the development of Red Sands PV1 is not associated with any fatal flaws from a heritage, archaeological and palaeontological perspective, and it is for this reason that the project is considered to be acceptable.

2.4.6 Visual Impacts

The proposed Red Sands PV1 will generally result in a relatively limited level of visual impact within an area that is already impacted by major electrical and railway infrastructure as well as other solar facilities. In general terms visual impacts will be largely limited by the relatively low height of the majority of the project and by landform.

Potential visual impacts identified within the Visual Impact Assessment (**Appendix H of BA Report**) include construction activities in close proximity to the PV plant, visual impacts to observers travelling along the roads and residents at homesteads within close proximity of the proposed PV facility, impact of lighting at night on sensitive visual receptors in close proximity to the proposed facility, and impact of solar glint and glare as a visual distraction and possible air travel hazard, impact of the ancillary infrastructure during the operation

phase on observers in close proximity to the structures and potential impact on the sense of place of the region.

The duration of the impacts is expected to be long-term for majority of the visual impacts and with a magnitude ranging from moderate to low. The significance of the impacts will be medium and low with the implementation of mitigation, depending on the impact being considered. No impacts of a high significance are expected to occur. The development of Red Sands PV1 is therefore considered to be acceptable from a visual perspective.

2.4.7 Social Impacts

The Social Impact Assessment (**Appendix I of BA Report**) identified that most social impacts associated with the development of Red Sands PV1 will have a short-term duration associated with the construction phase and long-term duration during the operation phase of the project. The magnitude of the impacts ranges from high to small depending on the impact being considered and the status thereof. Impacts on the social environment are expected during both the construction and operation phases. The construction phase of a PV solar development is associated with the majority of social impacts. Many of the social impacts are unavoidable and will take place to some extent but can be managed through the careful planning and implementation of appropriate mitigation measures.

During the construction phase, negative impacts include: nuisance impacts (including noise and dust); an influx of construction workers and job seekers to the area and a change in population; safety and security impacts; impacts on daily living and movement patterns; and visual and a sense of place impacts. The significance of the negative construction phase impacts will be low with the implementation of the recommended mitigation measures. The positive social impacts associated with the construction phase of Red Sands PV1 include, an economic multiplier effect, and direct and indirect employment and skills development opportunities. The significance of the positive impacts will be medium with the implementation of the recommended enhancement measures.

Impacts associated with the operation of Red Sands PV1 will be both positive and negative. The negative impacts are related to the change in the sense of place. The significance of the negative impacts will be low with the implementation of the recommended mitigation measures. The positive impacts associated with the operation of the facility relate to the development of non-polluting renewable energy infrastructure, a contribution to Local Economic Development (LED) and social upliftment, and the creation of employment and skill development opportunities for the local economy and the country. The significance of the positive impacts will be low and medium with the implementation of the recommended enhancement measures.

Red Sands PV1 is unlikely to result in permanent damaging social impacts and will result in a number of positive impacts. 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. Considering the findings of the report and potential for mitigation it is the reasoned opinion of the specialist that Red Sands PV1 can be authorised from a social perspective.

2.4.7 Cumulative Impacts

Cumulative impacts and benefits on various environmental and social receptors will occur to varying degrees with the development of several renewable energy facilities in South Africa. The most significant of these will be the contribution towards a reduction in greenhouse gas emissions and consequent assistance with climate change mitigation.

The alignment of renewable energy developments with the IRP and the global drive to move away from the use of non-renewable energy resources and to reduce greenhouse gas emissions is undoubtedly positive. The social and economic benefits of renewable energy developments at a local, regional and national level have the potential to be significant. However, there is a lack of understanding of the cumulative impacts on other environmental and social receptors such as birds, visual amenity and landscape character of the affected areas largely due to limited information of impacts from existing facilities within the country. This assessment is therefore qualitative.

The significance of the cumulative impacts associated with the development of Red Sands PV1 are predominately low to medium, depending on the impacts being considered, except for biodiversity and avifauna impacts which are high cumulative impacts, although were found to be acceptable due to appropriate placement of infrastructure. A summary of the cumulative impacts is included in **Table 2.4**.

Table 2.4: Summary of the cumulative impact significance for Red Sands PV1 within the development area

Specialist assessment	Overall significance of impact of the proposed project considered in isolation	Cumulative significance of impact of the project and other projects in the area
Ecology	Medium	High
Avifauna	Medium	High
Heritage (archaeology and palaeontology)	Low	Low
Visual	Low	Medium
Social	Medium (positive impacts) Low (negative impacts)	Medium (positive impacts) Low (negative impacts)

Considering the findings of the cumulative specialist assessments undertaken for the project the following can be concluded considering the Red Sands PV1 Facility:

- » There will be no unacceptable loss of biodiversity (vegetation, species types, and ecological processes) due to the degree of avoidance of the development area in relation to remaining high and very high areas of ecological importance within the broader project site and the region.
- » The moderate risk to avifauna through loss of habitat, infringement on breeding areas, or risk to collision-prone species is expected. In terms of potential losses to landscape connectivity, the development area has considered a degree of avoidance and avifauna can move to remaining areas, provided those future developments applied compensatory strategies, the overall cumulative impact of the development is considered acceptable.
- » The construction of the project will not result in the complete or whole-scale change in sense of place and character of the area nor will the project result in unacceptable visual intrusion. A number of solar projects have been constructed in the area, creating an existing impact and alteration to the current sense of place.

- » The construction of the project will not result in unacceptable loss of or impact to heritage resources.
- » The project will not significantly increase the negative impact on the social environment. However, an increase in positive impacts, specifically as a result of job creation and socio-economic benefits, can be expected.
- » The project will contribute towards a reduction in greenhouse gas emissions from energy generation and will aid the country in meeting the commitments made under the COP 21 Agreement, to which the Government has committed to become a signatory.

Based on a detailed evaluation, the cumulative impacts associated with the construction and operation of the proposed Red Sands PV1 and other proposed renewable energy facilities in the region are considered to be acceptable. The location of this project within the Upington REDZ is considered to be a desirable location for further consideration provided that environmental impacts are mitigated to suitable standards as recommended within this BA Report.

2.5. Environmental Sensitivity Mapping

As part of the specialist investigations undertaken within the development area of Red Sands PV1, specific environmental features were identified which will be impacted by the placement of the development footprint (i.e. project infrastructure) associated with the facility. The current condition of the features identified (i.e. intact or disturbed) informed the sensitivity of the environmental features and the capacity for disturbance and change associated with the proposed development.

The environmental features identified within and directly adjacent to the development area and development footprint are illustrated in **Figure 2.2**. The features identified specifically relate to ecological and avifauna habitats. The following points provide a description of the features present within the development area, as well as the surrounding area:

- » The development area is recognised as an Other Natural Area (ONA) as per the Northern Cape CBAs. Ecological Support Areas within the project site have been avoided.
- » Two National Forest Act (Act No. 84 of 1998) of 1998 (NFA) protected tree species occur at the site; i.e. *Vachellia haematoxylon* and *Boscia albitrunca*.
- » The habitat condition within the development area can be regarded as degraded due to the dense stands of *Rhigozum trichotomum* and *Senegalia mellifera* subsp. *detinens* in certain areas. Terrestrial flora and fauna sensitivity is low to moderate. The Site Ecological Importance (SEI), based on the Species Protocols (2020), was determined to 'High' based on the high likelihood of occurrence for a globally VU species, the extent of the area considered and its connectivity to natural areas within the landscape.
- » Although outside of the development area the following avifauna features have been identified:
 - * Breeding pair of Verreaux's Eagle (VU) recorded in the project site and have a nest nearby. A 3 km Buffer was placed around the nest;
 - * Thirteen Cape Vultures (EN) were found in the project site, an additional 30 vultures were recorded nearby;
 - * Two korhaan species (Red-Crested and Northern Black, NC Conservation Act of 2009 (schedule 2)) having territories in the project site; and
 - * A Pygmy Falcon Nest was found on the edge of the project site (NC Conservation Act of 2009 (schedule 2)), a 500m buffer was placed around the nest.

Considering the features identified within the project site and development area, the specialists have provided an indication of the acceptability of the proposed development. Given the degree of avoidance of the development area of High and Very High areas of ecological importance within the project site as well as avoidance of the avifauna buffers referred to above, the development may be considered acceptable as the residual impacts are expected to be of medium significance.

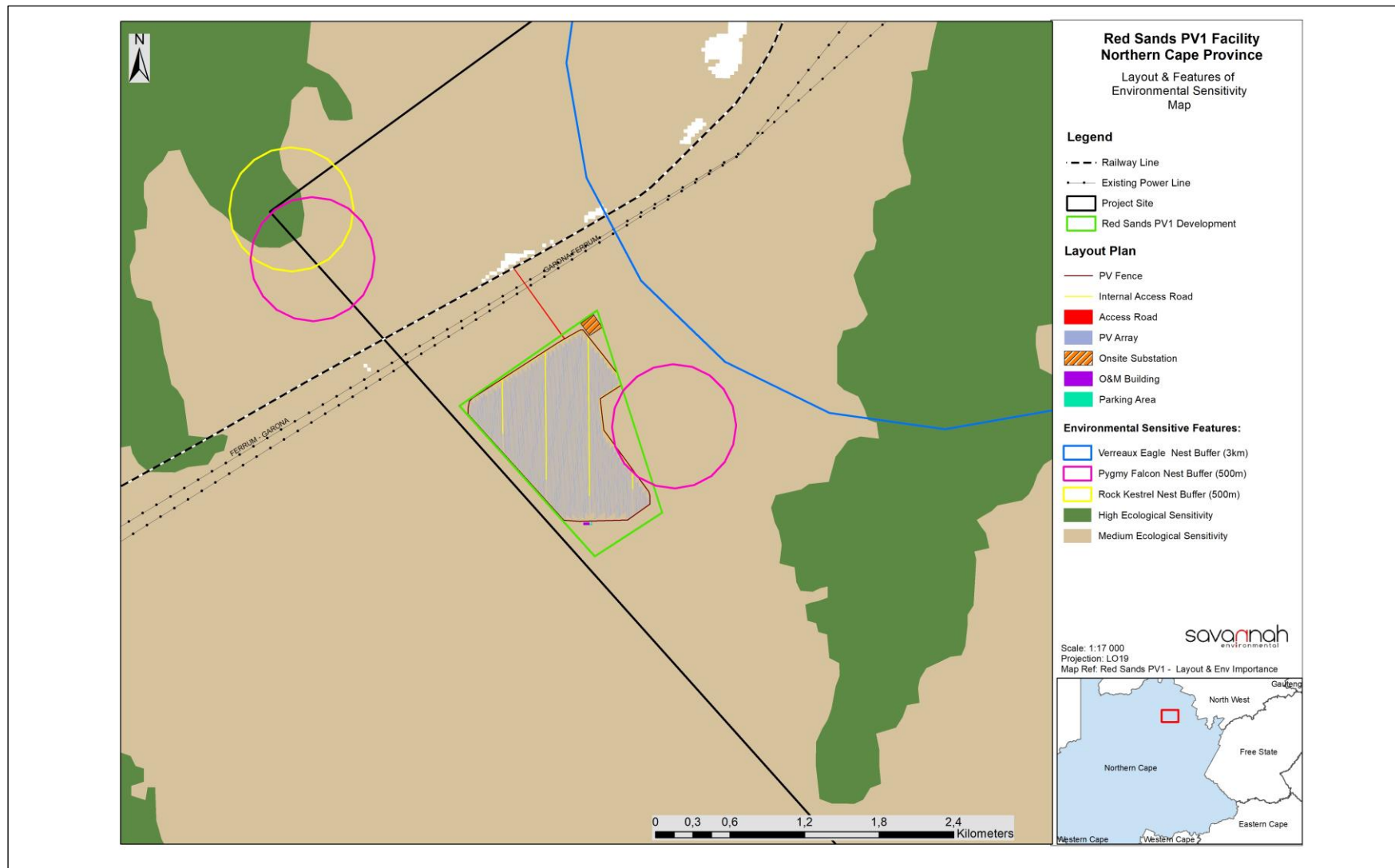


Figure 2.2: Final layout map of the development footprint for Red Sands PV1, as was assessed as part of the BA process, overlain with the environmental sensitivities.

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 Red Sands PV1. 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 Red Sands PV1 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 Red Sands PV1 development.
- » 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 BA process.

The mitigation measures identified within the BA 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 BA process for Red Sands PV1, it is important that this document be read in conjunction with the BA 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 (EA), the stipulations in the EA 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 operation 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. Any updates must be undertaken in accordance with the requirements of the relevant legislation.

CHAPTER 4: STRUCTURE OF THIS EMPr

The preceding chapters provide background to the EMPr and the proposed project, while the chapters that 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 that is necessary to meet the overall goal, which takes into account the findings of the BA specialist studies

Project Component/s	List of project components affecting the objective, i.e.: » PV Panels » 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 EMPr has been prepared as part of the BA process being conducted in support of the application for EA for Red Sands PV1. This EMPr has been prepared in accordance with DEA's requirements as contained in Appendix 4 of the EIA Regulations, 2014 (GNR 326). 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 A
(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 Appendix M
(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 –	Chapters 5 - 8

Requirement	Location in this EMPr
<ul style="list-style-type: none"> (i) Avoid, modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation. (ii) Comply with any prescribed environmental management standards or practices. (iii) Comply with any applicable provisions of the Act regarding closure, where applicable. (iv) Comply with any provisions of the Act regarding financial provision for rehabilitation, where applicable. 	
(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
<ul style="list-style-type: none"> (m) An environmental awareness plan describing the manner in which – <ul style="list-style-type: none"> (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

Project specific management plans have been developed for specific issues. These are included as follows:

- » Appendix B: Grievance Mechanism for Public Complaints and Issues
- » Appendix C: Alien Plant and Open Space Management Plan
- » Appendix D: Plant Rescue and Protection Plan
- » Appendix E: Re-vegetation and Rehabilitation Plan
- » Appendix F: Erosion Management Plan
- » Appendix G: Stormwater Management Plan
- » Appendix H: Waste Management Plan
- » Appendix I: Traffic Management Plan
- » Appendix J: Emergency Preparedness, Response and Fire Management Plan
- » Appendix L: Chance Find Protocol

4.2 Project Team

In accordance with Regulation 12 of the EIA Regulations, 2014 (GNR 326), as amended, the developer appointed Savannah Environmental (Pty) Ltd as the independent environmental consultant responsible for managing the application for EA and the supporting BA process. The application for EA and the BA process,

is being managed in accordance with the requirements of NEMA, the 2014 EIA Regulations (GNR 326), as amended, and all other relevant applicable legislation.

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

In accordance with Regulation 12 of the 2014 EIA Regulations (GN R326), AGV Projects (Pty) Ltd has appointed Savannah Environmental (Pty) Ltd (Savannah Environmental) as the independent environmental consultant to undertake the Basic Assessment and prepare the BA Report for Red Sands PV1 and its associated infrastructure. Neither Savannah Environmental nor any of its specialists are subsidiaries of/or are affiliated to AGV Projects (Pty) Ltd. Furthermore, Savannah Environmental does not have any interests in secondary developments that may arise out of the authorisation of the proposed solar PV facility.

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. The company was established in 2006 with a clear objective to provide services to the infrastructure development sector. Savannah Environmental benefits from the pooled resources, diverse skills and experience in the environmental field held by its team that has been actively involved in undertaking environmental studies for a wide variety of projects throughout South Africa and neighbouring countries. Strong competencies have been developed in project management of environmental processes, as well as strategic environmental assessment and compliance advice, and the assessment of environmental impacts, the identification of environmental management solutions and mitigation/risk minimising measures.

The Savannah Environmental team has considerable experience in environmental impact assessments and environmental management and has been actively involved in undertaking environmental studies for a wide variety of projects throughout South Africa, including those associated with electricity generation and transmission.

The Savannah Environmental team comprises:

Jana de Jager is the principal author of this report. She holds an Honours degree in Geography and Environmental Science and a Masters Degree in Ecological Water Requirements. She has 4.5 years of experience in the environmental management field. Her key focus is on undertaking environmental impact assessments, GIS mapping, public participation, environmental management plans and programmes. She is registered as a Candidate Natural Scientist with the South African Council for Natural Scientific Professions (SACNASP).

Jo-Anne Thomas is the Environmental Assessment Practitioner for this project. She holds a Master of Science Degree in Botany (M.Sc Botany) from the University of the Witwatersrand and is registered as a Professional Natural Scientist (400024/2000) with the South African Council for Natural Scientific Professions (SACNASP) and a registered Environmental Assessment Practitioner (EAP) with the Environmental Assessment Practitioners Association of South Africa (EAPASA) (2019/726). She has over 20 years of experience in the field of environmental assessment and management, and the management of large environmental assessment and management projects. During this time, she has managed and coordinated a multitude of large-scale infrastructure EIAs and is also well versed in the management and leadership of teams of specialist consultants, and dynamic stakeholders. She has been responsible for providing technical input for projects in the

environmental management field, specialising in Strategic Environmental Advice, EIA studies, environmental permitting, public participation, EMPs and EMPs, environmental policy, strategy and guideline formulation, and integrated environmental management (IEM). Her responsibilities for environmental studies include project management, review and integration of specialist studies, identification and assessment of potential negative environmental impacts and benefits, and the identification of mitigation measures, and compilation of reports in accordance with applicable environmental legislation.

Lehlogonolo Mashego . is a Gauteng Branch Committee Member for IAISA facilitating the students and young professionals division. She holds a Masters in Environmental Science and has over 4 years professional experience in the public participation field; specializing in overall public facilitation, stakeholder engagement, public awareness, stakeholder liaison and project administration. She is responsible for project management of public involvement participation processes for a wide range of projects across South Africa in industries which include but not limited to mining, renewable energy, infrastructure and recreation.

Nicolene Venter. She is a Board Member of IAPSA (International Association for Public Participation South Africa). She holds a Higher Secretarial Diploma and has over 21 years of experience in public participation, stakeholder engagement, awareness creation processes and facilitation of various meetings (focus group, public meetings, workshops, etc.). She is responsible for project management of public participation processes for a wide range of environmental projects across South Africa and neighbouring countries.

4.2.2 Details of the Specialist Consultants

A number of independent specialist consultants have been appointed as part of the BA project team in order to adequately identify and assess potential impacts associated with the project (refer to **Table 4.2**.. The specialist consultants have provided input into the BA Report as well as this EMP.

Table 4.2: Specialist Consultants which provided input into the EMP

Issue/Assessment	Specialist Name	Specialist Company
Biodiversity Impact Assessment	Andrew Husted	The Biodiversity Company
Avifauna Impact Assessment	Lindi Steyn	The Biodiversity Company
Soils Compliance Statement	Ivan Baker	The Biodiversity Company
Heritage Impact Assessment	Jenna Lavin Nicholas Willshire	CTS Heritage
Visual Impact Assessment	Jon Marshall	Environmental Planning & Design
Social Impact Assessment	Nondumiso Bulunga	Savannah Environmental

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, and the on-site facility substation), 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 Ecological Importance of the development area for Red Sands PV1 is regarded as High, specifically from an avian biodiversity and habitat perspective. However, the location of the development area has achieved an acceptable extent of avoidance within the project site, which will not result in unacceptable residual impacts. No environmental fatal flaws were identified in the detailed specialist studies conducted, and no impacts of unacceptable significance are expected to occur with the implementation of the recommended mitigation measures. These measures include, amongst others, the avoidance of sensitive features and the undertaking of monitoring, as specified by the specialists.

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 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 / Contractor Geotechnical specialist	Pre-construction
Nest buffers for Verreaux Eagle (3km), Pygmy Falcon (500m) and Rock Kestrel (500m) must be treated as No-go areas	Developer/Contractor	Project Planning
Finalise layout of all components, and submit to DFFE for approval prior to commencement of construction.	Developer Contractor	Pre-construction
The EMPr and the EA 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.	Developer Contractor	Tender Design and Design Review Stage
Ensure that the face of the PV panels procured have the most effective non-reflective surface possible.	Developer Contractor	Project planning
Solar panels must be mounted on pile driven or screw foundations, such as post support spikes, rather than heavy foundations, such as trench-fill or mass concrete foundations, to reduce the negative effects on natural soil functioning, such as its filtering and buffering characteristics, while maintaining habitats for both below and above-ground biodiversity	Developer/Contractor	Project Planning
Plan the placement of the temporary laydown areas and construction equipment camps in order to minimise vegetation clearing (i.e. in already disturbed areas) wherever possible and to avoid habitat loss and disturbance to adjoining areas and . ensure the laydown areas are properly fenced off.	Developer Contractor	Project planning
Plan development levels to minimise earthworks to ensure that levels are not elevated.	Developer Contractor	Project planning
The fence to be used to fence off the facility must be designed to be animal and bird friendly in order to prevent entrapment and electrocutions of ground-dwelling animal and bird species. No electrified strands should be placed within 30cm of the ground or alternatively, the electrified strands should be placed on the inside of the fence and not on the outside.	Developer Contractor	Project planning
Ensure clear rules and regulations for access to the proposed site are developed.	Developer Contractor	Pre-Construction
Carefully plan the access roads and entrances to the site in order to limit any intrusion on the neighbouring property owners and road users.	Developer Contractor	Planning and design
Plan a designated access point to the site to ensure safe entry and exit.	Developer Contractor	Design
Plan the laydown areas, operation and maintenance buildings such that they are located outside drainage features and their associated buffer zones.	Developer Contractor	Design

Mitigation: Action/Control	Responsibility	Timeframe
Plan the placement of light fixtures for the plant and the ancillary infrastructure in such a manner so as to minimise glare impacts on the surrounding area. All night-lighting should use low-UV type lights (such as most LEDs), which do not attract insects, and should be directed downwards.	Developer Contractor	Project planning
Where discharge of rainwater on roads will be channelled directly into the natural environment, the application of diffuse flow measures must be included in the design.	Developer Contractor	Project planning
New elements should be designed to blend as naturally as possible with their backdrop.	Developer / Contractor Design engineer	Planning and design
Plan to maintain the height of structures as low as possible.	Developer / Contractor Design engineer	Planning and design
Minimise disturbance of the surrounding landscape and maintain existing vegetation around the development.	Developer / Contractor Design engineer	Planning and design
Reduce the construction period as far as possible through careful planning and productive implementation of resources.	Developer Contractor	Pre-construction
No temporary site camps must be planned outside the development footprint of the project.	Developer	Planning and design
Should any water storage reservoirs be required, these should be covered with fine mesh or other exclusion material in order to exclude and prevent birds from accessing potentially contaminated water contained therein.	Developer Contractor	Planning and design
Have appropriate action plans on site, and training for contractors and employees in the event of spills, leaks and other potential impacts to the aquatic systems.	Developer Contractor	Planning and design
No advertising is permitted on the fence and/or within the road reserve and any outdoor advertising within 95m from the road centre line must be submitted to the Northern Cape Department of Roads and Public Works for review.	Developer Contractor	Duration of contract

Performance Indicator	<ul style="list-style-type: none"> » The design meets the objectives and does not degrade the environment. » Demarcated sensitive areas (i.e. no-go areas) are avoided at all times. » Design and layouts respond to the mitigation measures and recommendations in the BA 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 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 panels » Access roads » Inverter stations » Transformer » Underground cabling » Associated buildings
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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 of on-site facility substation footprint 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 solar PV facility 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 solar PV facility responds to the identified constraints identified through pre-construction surveys.

Mitigation: Action/Control	Responsibility	Timeframe
Obtain any additional environmental permits required from the Department of Forestry, Fisheries, and the Environment (DFFE) and the Northern Cape Department of Agriculture, Environmental Affairs, Rural Development and Land Reform (DAEARDLR) 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
Water Use Authorisation must be obtained from the Department of Water and Sanitation prior to commencing with construction activities.	Developer	Pre-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 must be transported on local roads and elicit their assistance in controlling traffic associated with the transportation of these loads.	Developer Contractor transporting material to site.	Planning and design
Pre-construction walk through of the facility's layout and the main access road must be undertaken by an ecological specialist.	Developer/ Contractor Specialist	Pre-construction
Undertake search and rescue for identified species of concern before construction in line with the requirements of the relevant permits.	Developer Contractor Specialist	Pre-construction
Affected individuals of selected protected plant species which cannot be avoided must be translocated to a safe area. This does not include woody plant species listed under the National Forest Act (Act No. 84 of 1989) which will require a permit from DFFE prior to their destruction.	Developer Specialist	Pre-construction
Vegetation clearing to commence only after the walk through has been conducted and necessary permits obtained.	Developer Contractor	Pre-construction
Pre-construction environmental induction must be provided to all construction staff on site 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.	Developer/ Contractor Specialist	Pre-construction

Mitigation: Action/Control	Responsibility	Timeframe
The Chance Fossil Find Protocol (Appendix L) must be implemented in the event that archaeological or palaeontological resources are found.	Developer Contractor	Pre-construction
The mitigation measures of the Stormwater Management Plan (SWMP) (Appendix G) must be implemented and should provide for a drainage system sufficiently designed to prevent water run-off from the solar panels to cause soil erosion.	Developer/ Contractor Design engineer	Pre-construction
Develop and implement an alien, invasives and weeds eradication/control plan (Appendix C).	Developer/ Contractor Specialist	Pre-construction
Compile and implement a construction period traffic management plan for the site access roads to ensure that no hazards would result from the increased truck traffic and that traffic flow would not be adversely impacted.	Contractor	Pre-construction

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 ECO prior to the commencement of construction. » Monitor ongoing compliance with the EMPr and method statements.

OBJECTIVE 3: Ensure appropriate planning is undertaken by each contractor

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 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 solar 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
Where feasible, local suppliers and contractors, that are compliant with the Broad-Based Black Economic Empowerment (B-BBEE) criteria, should be used as far as possible to ensure that the benefits resulting from the project accrue to the local	Developer Contractor	Pre-construction

Mitigation: Action/Control	Responsibility	Timeframe
communities which are also likely to be the most significantly impacted/affected by the project.		
Develop a database of local companies, specifically Historically Disadvantaged (HD), that 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 Contractor	Pre-construction
Adopt a local employment policy to maximise the opportunities made available to the local labour force.	Developer Contractor	Pre-construction
The tender documentation must stipulate the use of local labour as far as possible.	Developer Contractor	Pre-construction
Perform a skills audit to determine the potential skills that could be sourced in the local area.	Developer Contractor	Pre-construction
Develop and implement a recruitment protocol in consultation with the Tsantsabane LM and local community leaders. Ensure that the procedures for applications for employment are clearly communicated.	Developer Contractor	Pre-construction
In the recruitment selection process, a minimum percentage of women must be employed.	Developer Contractor	Pre-construction
Set realistic local recruitment targets for the construction phase.	Contractor	Pre-construction
Training and skills development programmes must be initiated prior to the commencement of the construction phase.	Developer Contractor	Pre-construction
Recruitment of temporary works onsite is not permitted. A recruitment office with a Community Liaison Officer must be established to deal with job seekers. The labour desk should be in a secure and suitable area in order to discourage the gathering of people at the construction site. .	EO	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
A security company must be appointed and appropriate security procedures implemented.	Developer Contractor	Pre-Construction

Performance Indicator	» Local employment and procurement is encouraged.
Monitoring	» Monitor ongoing compliance with the EMP and method statements.

OBJECTIVE 4 : Ensure effective communication mechanisms

On-going communication with affected and surrounding landowners, and surrounding communities 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	» PV facility
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	<ul style="list-style-type: none"> » Access roads » Associated infrastructure
Potential Impact	» Impacts on affected and surrounding landowners, communities 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 (Appendix B) procedure for 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.	Developer Contractor O&M Contractor	Pre-construction (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)
Organise local community meetings to advise the local labour of the project that is planned to be established and the jobs that can potentially be applied for.	EO	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

Performance Indicator	» Effective communication procedures in place.
Monitoring	<ul style="list-style-type: none"> » A grievance mechanism (Appendix B) and 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.

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, including drainage lines.
- » Minimises impacts on fauna (including avifauna) 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 developer, AGV Projects (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 (EO), 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.

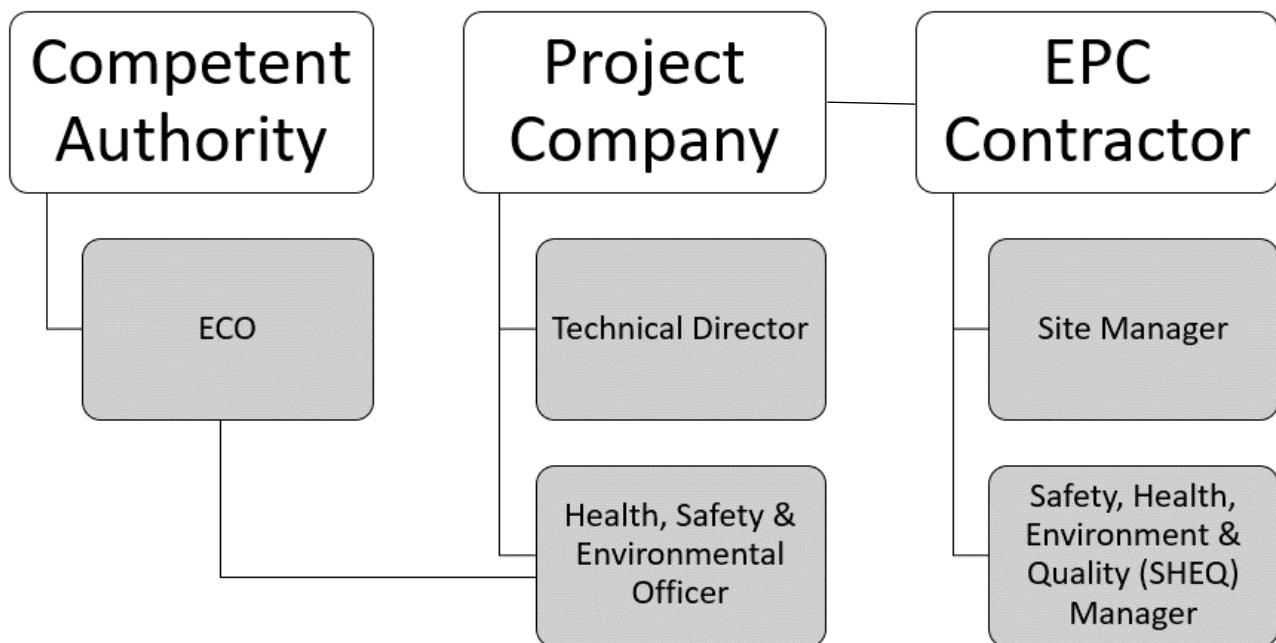


Figure 6.4: Organisational structure for the implementation of the EMPr

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 BA Report 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 BA Report.
- » 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 EO 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 **ECO** must be appointed by the project developer 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 BA Report.
- » 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 Environmental Affairs (DEA) in terms of compliance with the specifications of the EMPr and conditions of the EA (once issued).
- » Keep records of all reports submitted to DEA.

As a general mitigation strategy, the ECO should be present on site full-time for the site preparation and initial clearing activities to ensure the correct demarcation of no-go areas, to facilitate environmental induction with construction staff and to 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 Officer (EO) who will be located on site on a daily basis and will guide the EPC Contractors/Project Company to ensure compliance with the environmental considerations. Therefore, in the absence of the ECO there will be a designated owner's EO 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 EO may be appointed to support this function.

The Contractor's Safety, Health and Environment Representative and/or EO 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 the 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 the 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 Contractors must appoint an Internal 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 EO 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 solar PV 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 be responsible for community relations between the Developer, Owner, Contractor and the Engineer. The CLO will inform the 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 the end of working day. Normal working hours will be from 07:00 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 assist the contractors human resources team to, 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.
- » Communicate on a daily basis with the Contractor on labour related issues concerning the community. .
- » In relation to the community, identify possible labour disputes, unrest, strikes, etc., in advance and assist in their resolution.
- » 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.
- » Keep a daily written record of meetings and community liaison.
- » Arrange venues for meetings, if required.
- » Coordinate stakeholder contact through the implementation of a stakeholder management platform.

- » 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

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. » Low faunal impacts during construction. » 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
All personnel should undergo environmental induction with regards to fauna and, in particular, awareness about not harming or collecting species such as snakes, tortoises and owls, which are often persecuted out of superstition.	Developer Contractor	Site establishment and duration of construction
Any fauna threatened by the construction activities should be removed to safety by an appropriately qualified environmental officer.	Contractor/Suitably qualified personnel	Site establishment and duration of construction
If there are any active bird nests near construction areas, these should be reported to the ECO and where possible, these should be monitored until the birds have finished nesting and the fledglings have left the nest. The EO should monitor and enforce a ban on the hunting and collecting avifauna or their products (i.e. eggs).	Contractor	Site establishment and duration of construction
The EO must monitor and enforce a ban on hunting and the collection of all plants and animals and their products; and	EO	Site establishment and duration of construction

Mitigation: Action/Control	Responsibility	Timeframe
construction activities are restricted near active raptor/Secretary bird nests should these be discovered prior to or during construction (none were identified during the BA process).		
Any avifauna threatened or injured by construction activities should be removed to safety by the EO or any appropriately qualified professional.	EO/Suitably qualified personnel	Duration of construction
All construction vehicles should adhere to the demarcated access roads and must adhere to a low speed limit (40km/h max for heavy duty vehicles and 30km/h max for light duty vehicles) to avoid collisions with susceptible species such as snakes and tortoises.	Developer Contractor	Duration of construction
Minimise vegetation clearance and maintain the existing vegetation as far as possible with the development footprint and on the surrounding areas. Unnecessary vegetation clearance must be avoided.	Contractor	Duration of construction
Vegetation clearance must only be undertaken prior to construction.	Contractor	Duration of construction
Soil stockpiles must be dampened with a dust suppressant or an equivalent to prevent erosion by wind.	Contractor	Duration of construction
All graded or disturbed areas which will not be covered by permanent infrastructure such as paving, buildings or roads must be stabilised with erosion control mats (geo-textiles) and revegetated.	Contractor	Duration of construction
Signs of erosion within the development footprint must be documented through photographic evidence encompassed with the inclusion of the GPS coordinates of the identified problem areas.	EO	Duration of project
All soil stockpiles on site that are within 100m of the large drainage line must be bunded using an appropriate structure (i.e. silt nets, sand bags, pegged wooden planks, etc.)	Contractor	Site establishment and duration of construction.
All vehicles and machinery must be checked for leaks before being allowed to operate on site. Should leaks be detected, the relevant vehicles and machinery must be repaired before being allowed to operate on the development area.	Contractor	Site establishment and duration of construction
Vehicle movement through the drainage lines is to be limited as far as possible.	Contractor	Site establishment and duration of construction.
If holes or trenches are to be dug, these should not be left open for extended periods of time as terrestrial avifauna may become entrapped therein.	Contractor	Site establishment and duration of construction
Where erosion takes place, the EO must inspect the degree of erosion and propose suitable mitigation measures to prevent further erosion.	Contractor EO	Construction
The Stormwater Management Plan (Appendix G) must be implemented for the construction phase to ensure that drainage and run-off issues on the site are adequately addressed.	Contractor Civil Engineer	Site establishment and duration of construction.
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 and high sensitivity areas.	Contractor	Duration of construction

Mitigation: Action/Control	Responsibility	Timeframe
Restrict the activities and movement of construction workers and vehicles to the immediate construction site and existing access roads.	Contractor	Construction
Access to adjacent areas to be strictly controlled.	Developer Contractor	Pre-construction 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 appropriately 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.	Contractor	Site establishment, and duration of construction
Ablution or sanitation facilities must not be located within 100m from any drainage line 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

Performance Indicator

- » Site is secure and there is no unauthorised entry.
- » No members of the public/ landowners injured.

	<ul style="list-style-type: none"> » Appropriate and adequate waste management and sanitation facilities are 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. » Avifaunal microhabitat loss restricted to development footprint. » Low disturbance and impact on red-listed avifaunal species. » Avifauna do not have access to water contained in reservoirs. » Low mortality of avifauna due to construction machinery and activities. » No disturbance of breeding raptors (i.e. no nest abandonment due to disturbance), if present in the development area. » No poaching or collecting of avifauna or their products (e.g. eggs and nestlings) by construction personnel. » Removal to safety of entrapped/injured avifauna encountered during construction. » Prevent, minimise and manage any visible erosion within the development footprint of the project.
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 must be immediately reported to the Site Manager. » Monitoring of vegetation clearing during construction (by contractor as part of construction contract). » On-going visual assessments of disturbed areas to ensure erosion prevention by the EO. » Monitor visual signs of erosion such as the formation of gullies after rainfall events and the presence of the dust emissions during wind storms. » Monitoring of rehabilitated areas quarterly for at least a year following the end of construction (by contractor as part of construction contract). » Vegetation is cleared only within footprint areas during construction. » Perimeter fencing is constructed in a manner that is considered bird friendly, especially with respect to ground-dwelling birds. » Open reservoirs on site are covered with mesh to exclude birds. » No birds or eggs are disturbed or removed by construction personnel.

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

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"> » 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:	» Limit equipment storage within demarcated designated areas.
Target/Objective	» Ensure adequate sanitation facilities and waste management practices are implemented.
	» 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 (PPE).	Contractor	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 EA, the BA Report, and this EMP, as well as the requirements of all relevant environmental legislation.	Contractor	Construction
Introduce an incident reporting system to be tabled at weekly/monthly project meetings.	Contractor and sub-contractor/s	Pre-construction
Infrastructure such as the perimeter fences (including gates) and the main access and internal roads must be maintained or repaired if disturbed or damaged due to construction activities.	Contractor	Construction
Adequate traffic warning signs and control measures (including speed limits) must be implemented along access roads to warn road users of the construction activities taking place for the duration of the construction phase. Ensure that all signage is visible at all times (especially at night) and must be maintained throughout the construction phase.	Contractor	Construction
All vehicles must be road worthy and drivers must be licensed, obey traffic rules, follow speed limits and be made aware of potential road safety issues.	Contractor and sub-contractor/s	Construction
Implement penalties for drivers of heavy and light vehicles for reckless driving or speeding as a way to enforce compliance to traffic rules.	Contractor	Construction
Heavy and light vehicles must be inspected regularly to ensure their road safety worthiness. Records pertaining to this must be maintained and made available for inspection as necessary.	Contractor	Construction
Ensure all construction equipment and vehicles are properly maintained at all times.	Contractor	Construction
Restrict the operation of power tools and plant that generate noise to daylight hours as per the Environment Conservation Act (Act No. 73 of 1989) during the construction phase, and/or as any deviation that is approved by the relevant authorities.	Contractor	Construction
Ensure that construction workers are clearly identifiable. All workers should carry identification cards and wear identifiable clothing.	Contractor	Construction
As far as possible, minimise vegetation clearing and levelling for equipment storage areas.	Contractor	Site establishment, and during construction

Mitigation: Action/Control	Responsibility	Timeframe
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 activities in the region and the risk it poses in respect of crime.	Contractor	Duration of Contract
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	Duration of construction
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	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

Mitigation: Action/Control	Responsibility	Timeframe
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
Workers must be aware of the importance of drainage lines and drainage systems (especially those located within and surrounding the development footprint) and the significance of not undertaking activities that could result in pollution of the features.	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
Ensure all requirements of the OHS Act and any other relevant health and safety protocols are appropriately implemented.	Contractor	Construction
Keep record of all accidents or transgressions of safety in accordance with OHS Act and implement corrective action.	Contractor	Construction
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
A CLO should be appointed and a grievance mechanism (Appendix B) implemented. A communication protocol should be implemented whereby procedures to lodge complaints are set out in order for the local community to express any complaints or grievances with the construction process.	Contractor	Construction

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 are received. » 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. » Vehicles are roadworthy, inspected regularly and speed limits are adhered to. » Roadworthy certificates are in place for all vehicles. » Traffic warning signs are placed along the main access road and these are well illuminated at night. » Roads and the perimeter fence are maintained or improved if disturbed. » A CLO is appointed for the project. » The CLO is available for community grievances and provides a communication channel.
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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.
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OBJECTIVE 4: Maximise local employment, skills development and business opportunities associated with goods and services from the local area. Engage with local authorities and business organisations to investigate the possibility of procurement of construction materials, goods and products from local suppliers, where feasible.

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.

Project Component/s	<ul style="list-style-type: none"> » Construction activities associated with the establishment of the solar 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.
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.

Mitigation: Action/Control	Responsibility	Timeframe
A local procurement policy must be adopted to maximise the benefit to the local economy.	Developer Contractor	Construction
Where feasible, source as much goods and services as possible from the local area. Engage with local authorities and business organisations to investigate the possibility of procurement of construction materials, goods and products from local suppliers.	Developer	Duration of project
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

Mitigation: Action/Control	Responsibility	Timeframe
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
Proof of skills development must be provided to the upskilled individuals.	Developer Contractor	Construction
Identify opportunities for local businesses and ensure that the services from local businesses are prioritised.	Contractor	Construction

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. » Local goods and services are purchased from local suppliers.
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

Project Component/s	<ul style="list-style-type: none"> » PV panels. » Underground cabling. » Ancillary buildings. Construction of the internal access roads.
Potential Impact	<ul style="list-style-type: none"> » Impacts on natural vegetation, habitats and fauna. » Loss of indigenous natural vegetation due to construction activities and vegetation clearing. » Impacts on soil. » Loss of topsoil. » Erosion.
Activity/Risk Source	<ul style="list-style-type: none"> » 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: Target/Objective	<ul style="list-style-type: none"> » To minimise the development footprint as far as possible. » To minimise impacts on surrounding sensitive areas. » To minimise impacts on soils. » Minimise spoil material. » Minimise erosion potential.

Mitigation: Action/Control	Responsibility	Timeframe
Contractor's EO to provide supervision and oversight of vegetation clearing activities within sensitive areas such as drainage lines.	Developer Contractor EO	Construction
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

Mitigation: Action/Control	Responsibility	Timeframe
Land clearance must only be undertaken immediately prior to construction activities and only within the development area.	Contractor	Construction
Retain 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
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
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
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
Topsoil must be removed and stored at a maximum height of 2m 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. (maximum length of time before re-use 18 months).	Contractor	Construction
Soil stockpiles must be located away from any drainage lines 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

Mitigation: Action/Control	Responsibility	Timeframe
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 observed within the development area as a result of the construction activities must be rectified immediately and monitored thereafter to ensure that they do not re-occur.	Contractor	Construction
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 drainage lines and other sensitive areas.	Contractor	Construction
Erosion control measures to be regularly maintained.	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
Topsoil to be stripped when the soil is dry in order to reduce compaction. The topsoil should be stripped by means of an excavator bucket, and loaded onto dump trucks.	Contractor	Construction
The handling of the stripped topsoil must 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 must be vegetated in order to reduce the risk of erosion, prevent weed growth and to reinstitute the ecological processes within the soil.	Contractor	Construction
Cleared vegetation must be removed from site and must not be stored onsite.	Contractor	Construction
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	Contractor	Construction

Mitigation: Action/Control	Responsibility	Timeframe
which are directed downward and do not result in large amounts of light pollution.		
Fluorescent and mercury vapour lighting should be avoided and sodium vapor (yellow) lights should be used wherever possible.	Contractor	Construction
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

Performance Indicator	<ul style="list-style-type: none"> » No disturbance outside of the designated work areas. » Minimised clearing of existing vegetation. » Vegetation and habitat loss is restricted to the development 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 the development area. » No activity is undertaken in restricted areas. » Minimal level of soil degradation.
Monitoring	<ul style="list-style-type: none"> » Contractor's EO to provide supervision and oversight of vegetation clearing activities within sensitive areas such as near drainage lines. » Supervision of all clearing and earthworks. » Ongoing monitoring of erosion management measures within the development area. » 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: Protection of avifauna

Project component/s	<ul style="list-style-type: none"> » PV panels. » Access roads. » Cabling between project components. » Substation. » All other associated infrastructure.
Potential Impact	<ul style="list-style-type: none"> » Disturbance of birds (e.g. destruction of habitat). » Displacement of birds. » Collision with project components. » Traffic to and from site.
Activity/risk source	<ul style="list-style-type: none"> » Site preparation and earthworks. » Foundations or plant equipment installation. » Mobile construction equipment movement on site. » Access road construction activities. » Substation construction facilities.
Mitigation: Target/Objective	<ul style="list-style-type: none"> » To minimise footprints of habitat destruction. » To minimise disturbance to resident and visitor avifaunal species.

Mitigation: Action/control	Responsibility	Timeframe
The extent of clearing and disturbance to the vegetation must be kept to a minimum so that impact on avifauna and their habitats is restricted.	Contractor	Construction
Speed limits (30 km/h) should be strictly enforced on site to reduce probability of vehicle collisions.	Contractor	Construction
No dogs or cats other than those of the landowners should be allowed on site.	Contractor	Construction
Construction camps should be lit with as little light as practically possible, with the lights directed downwards where appropriate.	Contractor	Construction
Each pylon for new overhead power lines must be fitted with a safe bird perch.	Contractor	Construction
The appointed Environmental Officer must be trained to identify the potential Red Data species as well as the signs that indicate possible breeding by these species. The Environmental Officer must then, during audits/site visits, make a concerted effort to look out for such breeding activities of Red Data species, and such efforts may include the training of construction staff (e.g. in Toolbox talks) to identify Red Data species, followed by regular questioning of staff as to the regular whereabouts on site of these species.	Contractor	Construction
If any of the Red Data species are confirmed to be breeding (e.g. if a nest site is found), construction activities within 500 m of the breeding site must cease, and an avifaunal specialist is to be contacted immediately for further assessment of the situation and instruction on how to proceed.	Contractor	Construction
Any holes dug e.g. for foundations of pylons should not be left open for extended periods of time to prevent entrapment by ground dwelling avifauna or their young and only be dug when required and filled in soon thereafter.	Contractor	Construction
Temporary fencing must be suitably constructed, e.g. if double layers of fencing are required for security purposes they should be positioned at least 2 m apart to reduce the probability of entrapment by larger bodied species that may find themselves between the two fences.	Contractor	Construction
Roadkill is to be reported to the ECO and removed as soon as possible to reduce the attraction of the site to crows and other scavengers.	Contractor	Construction

Performance Indicator	<ul style="list-style-type: none"> » No 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), especially those of conservation concern.
Monitoring and Reporting	<ul style="list-style-type: none"> » Observation of vegetation clearing activities by the EO throughout construction phase. » Supervision of all clearing and earthworks by the EO.

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.

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 development area 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 the development area. » 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 development area. » To avoid distribution and thickening of existing alien plants in the development area. » To complement existing alien plant eradication programs in gradually causing a significant reduction of alien plant species throughout the development area.

Mitigation: Action/Control	Responsibility	Timeframe
Develop and implement an Alien Invasive Plant (AIP) 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

Mitigation: Action/Control	Responsibility	Timeframe
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. Continually monitor the re-emergence of these species and manage according to the invasive species management plan (Appendix C).	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 horticultural chemicals must be carefully controlled and only applied by personnel adequately certified to apply pesticides and herbicides. It must be ensured that World Health Organisation (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.	Contractor	Construction

Performance Indicator	» Low abundance of alien plants. For each alien species: number of plants and aerial cover of plants within the development area 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 development area. » The environmental manager/site agent should be responsible for driving this process. » Reporting frequency depends on legal compliance framework.

OBJECTIVE 8: Minimise impacts on surface water resources

The minor drainage lines (dry drainage lines) that bisect the central and northern sections of the development area are dominated by a woody component. Common species in these areas include the large shrubs *Phaeoptilum spinosum*, *Rhigozum trichotomum*, *Monechma incanum* and *Lycium oxycarpum* with occasional *Boscia foetida* and *Boscia albitrunca*. Some impacts (panel areas & road crossings) are located in secondary alluvial water courses and minor drainage lines that were either fragmented or contained no riparian zones, with a Moderate sensitivity.

Project component/s	<ul style="list-style-type: none"> » Construction activities. » Storage of dangerous goods. » Ablution facilities.
Potential Impact	» Compaction of soil.

	<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 drainage lines. » Erosion of soils surrounding drainage lines. » Potential proliferation of alien and invasive species within the drainage lines (i.e. drainage lines). » Vegetation clearance in drainage lines. » Movement of vehicles in drainage lines.
Activity/risk source	<ul style="list-style-type: none"> » Re-fuelling, usage and maintenance of construction vehicles. » Cement batching and usage. » Ablution facilities usage by employees. » Use of any chemicals or hazardous materials/dangerous goods during construction.
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 drainage lines including the riparian habitat.. » No misbehaviour of construction workers (i.e. ablution activities, washing).

Mitigation: Action/control	Responsibility	Timeframe
Alien Invasive and Control Management Plan (Appendix C) is to be formulated and implemented.	Contractor	Construction
Ensure strict management of potential sources of pollution (hydrocarbons from vehicles and machinery, cement during construction, etc.). Bunded containment to be provided below and around any fuel storage containers.	Contractor	Construction
No storage of fuels, oils or any other hazardous substance are allowed directly in the drainage lines or within 100m from any drainage line.	Contractor	Duration of contract
Temporary ablution facilities may not be placed directly or within 100m of any drainage line.	Contractor	Construction
Temporary ablution facilities must be regularly checked for leaks and spillages, and repaired where any leakages are detected before being allowed for use on the site.	Contractor	Construction
Where erosion takes place, the EO must inspect the degree of erosion and propose suitable mitigation measures to prevent further erosion.	Contractor EO	Construction
Construction equipment is to be checked daily (by Contractor) to ensure that no fuel spillage takes place from construction vehicles or machinery.	Contractor	Construction
Proper use of ablutions should be strictly enforced and ablutions should be regularly cleaned and serviced.	Contractor	Construction
Sand, stone and cement must be stored in demarcated areas, and must be covered or sealed to prevent wind erosion and resultant deposition of dust on the surrounding indigenous vegetation.	Contractor	Construction
Any excess sand, stone and cement must be removed from site at the completion of the construction period.	Contractor	Construction

Mitigation: Action/control	Responsibility	Timeframe
Measures must be put in place to control illegal dumping of construction waste as this may result in the pollution of surface water run-off. Furthermore, no pollution of groundwater resources may occur.	Contractor	Construction
Any areas disturbed during the construction phase should be encouraged to rehabilitate as fast and effective as possible.	Contractor	Construction
Where possible, reduce the footprint area of exposed ground and prioritise vegetation clearing for the winter months as far as possible.	Contractor	Construction
Exposed areas must be ripped and vegetated to increase surface roughness.	Contractor	Construction
A comprehensive rehabilitation plan must be developed and implemented from the project onset to ensure net benefit of the environment within all the drainage lines that were affected during construction.	Contractor	Construction

Performance Indicator	<ul style="list-style-type: none"> » No major preventable spillages are recorded. » No erosion recorded within the drainage lines within the development area. » No degradation of the water resources within the development area.
Monitoring	<ul style="list-style-type: none"> » Monitor management measures in place for potentially hazardous materials. » Monitoring occurrence of erosion and degradation within the drainage lines.

OBJECTIVE 9: Appropriate Stormwater Management

The Stormwater Management Plan (SWMP) aims to facilitate the protection of surface water resources within the development area of Red Sands PV1. Although, the findings of the aquatic assessment (**Appendix G**) indicated that the development of the solar PV facility is likely to have a low impact, it remains important that the engineers and contractors responsible for the detailed design of the stormwater management systems consider the requirements of this EMPr, as well as, the recommendations by other specialists on the project.

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
The mitigation measures included in the Stormwater Management Plan (Appendix G of the EMPr) must be implemented.	Contractor Developer	Duration of project
Stormwater management around the construction footprint areas must be undertaken to ensure that sediment-laden run-off does not enter the surrounding drainage lines.	Contractor	Construction

Mitigation: Action/Control	Responsibility	Timeframe
Any stormwater within the site must be handled in a suitable manner. Contaminated water must not be discharged into the surrounding environment.	Contractor and Engineers	Construction
. Any stormwater within the development area must be handled in a suitable manner, i.e. separate clean and dirty water streams around the plant, and install stilling basins to capture large volumes of run-off, trap sediments and reduce flow velocities (e.g. water used when washing the PV Panels).	Contractor	During site establishment
Establish silt fences or berms to prevent sediment transport into the large drainage line.	Construction	During site establishment
All roads and other hardened surfaces must have runoff control features which redirect water flow and dissipate any energy in the water which may pose an erosion risk.	Contractor	Construction
The access roads should be permeable to allow for drainage from the road surface. In this regard, suitable stormwater management should be implemented to allow for water to drain from the roads without causing erosion.	Contractor	Construction
Where discharge of rainwater on roads will be channelled directly into the natural environment, the application of diffuse flow measures must be included in the design	Contractor	Construction
New access roads within the site are to be constructed according to design and contract specifications. The access routes must have suitable storm water management plans and erosion control measures.	Contractor	Construction
Drainage measures must promote the dissipation of storm water run-off.	Contractor	Construction
Any loss/alteration of flow dynamics must be quantified, and mitigation options to re-introduce water in a safe and environmentally friendly way must be assessed.	Contractor	Construction
Site surface water and wash water must be contained and treated before reuse or discharge from site.	Contractor	Construction

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

OBJECTIVE 10: Protection of Heritage Resources

Although heritage resources have been identified within the study area and development area for Red Sands PV1, these are of a low significance and no fatal flaws have been identified to be associated with the development; therefore, the development area is considered as an appropriate place for the development of a solar PV facility.

Project Component/s	<ul style="list-style-type: none"> » PV facility. » Access roads. » Associated infrastructure.
Potential Impact	» Heritage objects or artefacts found on site and within the development footprint 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
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, and heritage specialist	Duration of contract, particularly during excavations
EO to alert workers to the importance of reporting fossil bones seen on site and to the possibility of encountering human remains.	EO	Construction
A Chance Find Protocol (Appendix L) 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.	Developer Contractor	Construction and duration of contract
If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contacted 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.	EO Developer	Construction and duration of contract
<p>Chance fossil finds such as vertebrate bones and teeth or shells should be safeguarded preferably in-situ and reported by the EO as soon as possible to the South Africa Heritage Resources Agency, SAHRA.</p> <p>Contact Details:</p> <p>111 Harrington Street, Cape Town P.O Box 4637 Cape Town 8001 Tel: +27 (021) 462 4502 Fax: +27 (021) 462 4509 www.sahra.org.za</p>	EO Archaeologist	Construction and duration of contract.
If unmarked human burials are uncovered, the SAHRA Burial Grounds & Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490) must be alerted immediately.	EO Developer	Construction and duration of contract.

Performance Indicator	<ul style="list-style-type: none"> » No disturbance outside of designated work areas. » All heritage items discovered 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 air emissions

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.

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
Implement appropriate dust suppression measures on a regular basis along gravel access roads and on the cleared portions of the development area.	Contractor	Construction
Areas must 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

Mitigation: Action/control	Responsibility	Timeframe
Roads must be maintained to ensure that nuisance to the community from dust emissions from road or vehicle sources is not visibly excessive.	Contractor	Construction
Haul vehicles moving outside the construction site carrying material that can be wind-blown must 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
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
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

Performance Indicator	<ul style="list-style-type: none"> » No complaints from affected residents or surrounding communities regarding dust or vehicle emissions. » Limited visual presence of dust and good 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 are 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 the outset of the construction phase and updated 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 regards to 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

Project Component/s	» Delivery of any component required for the construction phase of the solar PV facility.
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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 development area. » 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 solar PV 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
Compile and implement a construction period traffic management plan (Appendix I) for the site access roads to ensure that no hazards would result from the increased truck traffic and that traffic flow would not be adversely impacted.	Contractor	Pre-construction
Undertake regular maintenance of gravel roads.	Contractor	Construction
Ensure that, at all times, affected 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
Strict vehicle safety standards must 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 must 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
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 roads 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

Mitigation: Action/Control	Responsibility	Timeframe
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 construction vehicles must remain on properly demarcated roads. No off-road driving to be allowed.	Contractor	Construction
Implement penalties for reckless driving for the drivers of heavy vehicles as a way to enforce compliance to traffic rules.	Contractor	Construction
The contractors must ensure that there is a dedicated access road and an access control point to the development area.	Contractor	Construction
Provide clearly defined roadway, parking and pedestrian walkway areas within the site with adequate lighting.	Contractor	Construction
Provide flagmen at the access road when accommodating abnormal load vehicles.	Contractor	Construction
On-site parking and safe turn-around facilities should be provided for private vehicles and for buses and mini-buses transporting workers to and from site.	Contractor	Construction

Performance Indicator	<ul style="list-style-type: none"> » Vehicles are 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 Red Sands PV1 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)

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 manifest must be developed for the ablutions showing proof of disposal of sewage at appropriate water treatment works.

Mitigation: Action/Control	Responsibility	Timeframe
Construction method and materials must 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 (Appendix H) 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 are placed, dumped or deposited on adjacent/surrounding properties, and that the waste is disposed of at a 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
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 waste must 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

Mitigation: Action/Control	Responsibility	Timeframe
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 must be available and easily accessible.	Contractor	Duration of contract
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
Under no circumstances may waste be burnt on site or on surrounding premises.	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
Implement an integrated waste management approach (Appendix H) 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
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 construction
Broken PV panels must be stored in a designated closed off area on site prior to removal from the site during construction. All broken panel must be removed from site following construction,	Contractor	Duration of construction

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.
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	» 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 the 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 grievances register must 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, 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.

Project Component/s	<ul style="list-style-type: none"> » Laydown areas. » Subcontractors' camps. » 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 (including hydrocarbons) and machinery on-site does not cause pollution to 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
Implement an emergency preparedness plan (Appendix J) during the construction phase.	Contractor	Duration of Contract
Any liquids stored on site, including fuels and lubricants, must 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 and leaks of contaminants.	Contractor	Duration of contract
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

Mitigation: Action/Control	Responsibility	Timeframe
Establish an appropriate Hazardous Store which is in accordance with the Hazardous Substance Amendment Act, No. 53 of 1992. This should include but not be limited to: » Designated area; » All applicable safety signage; » Firefighting equipment; » Enclosed by an impermeable bund; » Protected from the elements, » Lockable; » Ventilated; and » Have 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 DEA 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
Oily water from bunds at the on-site facility substation must be removed from site by licensed contractors.	Contractor	Duration of contract
The storage of flammable and combustible liquids such as oils must be undertaken in designated areas which are appropriately bunded, and stored in compliance with Material Safety Data Sheets (MSDS) files.	Contractor	Duration of contract

Mitigation: Action/Control	Responsibility	Timeframe
Any storage and disposal permits/approvals which may be required must be obtained, and the conditions attached to such permits and approvals must be complied 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 entering the soil or clean stormwater system.	Contractor	Construction
As much material as possible 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, serviced and re-fuelled regularly for faults and possible leaks, these should be serviced off-site (pre-use inspection). These activities should either take place off-site, or in controlled and bunded working areas.	Contractor	Construction
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, where aquatic features have been affected.	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 and be placed beneath standing machinery/plant.	Contractor	Construction
In the case of petrochemical spillages, the spill must 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

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.
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	» Proper waste management.
Monitoring	<ul style="list-style-type: none"> » Observation and supervision of chemical storage and handling practices and vehicle maintenance throughout the construction phase. » A grievances 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 EMP. » 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 the volume and the nature of the 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.

6.3 Detailing Method Statements

OBJECTIVE 14: 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 EMP 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).
- » Stormwater 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 with 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 that an appropriate method statement has been submitted and approved.

6.4 Awareness and Competence: Construction Phase

OBJECTIVE 15: 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 EMP. 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 EMP 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 EMP 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 must have 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 development area.

Therefore, prior to the commencement of construction activities and before any person commences with work thereafter, adequate environmental awareness and responsibility are to be appropriately presented to all staff present on-site, 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 must 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 must 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 must 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 EO and should include discussing AGV Projects (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 the 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 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 must 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 16: 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 EA (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 DEA in terms of the EA, 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 DEA for their records. This Report must 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 DEA regarding waste related activities.

6.5.3. Audit Reports

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

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 DEA until the completion of construction and rehabilitation. This Report must be compiled in accordance with Appendix 7 of the EIA Regulations, 2014, as amended (or any update thereto), and indicate the date of the audit, the name of the auditor and the outcome of the audit in terms of compliance with the EA 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 DEA 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 EA 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 construction 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 must be undertaken in an area as soon as possible after the completion of construction activities within that area.

Project Component/s	<ul style="list-style-type: none"> » Construction camps. » Laydown areas. » Access roads. » Ancillary buildings. » All other areas affected by construction activities and not required for operation.
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 and laydown 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 (Appendix E).	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	Contractor	Following completion of construction activities in an area

Mitigation: Action/Control	Responsibility	Timeframe
must be cleaned up and the contaminated soil appropriately disposed of.		
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 solar 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 must be top soiled and re-vegetated.	Contractor	Following completion of construction activities in an area
Temporary roads must be closed and access to 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.	Developer in consultation with rehabilitation specialist	Post-rehabilitation
Erosion control measures must be used in sensitive areas such as steep slopes, hills, and drainage systems if necessary.	Developer 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.	Developer	Post-rehabilitation

Performance Indicator

- » All portions of the site, including the construction equipment camp and working areas, are cleared of equipment and temporary facilities.
- » Topsoil is replaced on all areas and stabilised where practicable or required after construction and temporally utilised areas.
- » Disturbed areas are rehabilitated and an acceptable plant cover achieved on rehabilitated sites.

	» The completed site is free of erosion and alien invasive plants.
Monitoring	<ul style="list-style-type: none">» Rehabilitated areas must 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 been rehabilitated to a satisfactory level.» On-going inspection of rehabilitated areas in order to determine the 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 Red Sands PV1 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 Technical/SHEQ Manager for the operation phase of this project are detailed below.

The **Operations 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 the 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 solar 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 Environmental Affairs (DEA) 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 solar PV Facility

Indirect impacts on vegetation and terrestrial fauna and avifauna 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.

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 » Birds 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.	O& M Contractor	Operation
Where the vegetation is not re-establishing itself, particularly in areas of disturbance, soil samples must be collected and taken in for analysis at a registered laboratory for pH levels, electrical conductivity and major plant nutrients. The results must be submitted to a suitably qualified soil or agricultural scientist for recommendations to ensure that the vegetation cover is established and erosion is prevented.	O&M Contractor Developer	Duration of project
Where 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.	O&M Contractor Developer	Duration of project
Site access and access to adjacent areas should be controlled and only authorised staff and contractors should be allowed on-site.	O&M Contractor	Operation
All vehicles accessing the site should adhere to a low speed limit (40km/h max for heavy vehicles and 30km/h max for light vehicles) to avoid collisions with susceptible species such as snakes and tortoises.	O&M Contractor Developer	Operation
Maintain and augment natural vegetation around the proposed project	O&M Contractor	Operation

Mitigation: Action/Control	Responsibility	Timeframe
Vegetation control should be by manual clearing and herbicides should not be used except to control alien plants in the prescribed manner.	O&M Contractor	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 World Health Organisation (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.	O&M Contractor Developer	Operation
All incidents of bird collision with PV panels should be recorded as meticulously as possible, including data related to the species involved, the exact location of collisions within the facility, and suspected cause of death. Site security video surveillance records could be used if available, as this will contribute towards understanding bird interactions with solar panels.	O&M Contractor	Operation
Post-construction monitoring with the aid of video surveillance should be considered, as this will contribute towards understanding bird interactions with solar panels, in accordance with suggestions made by Visser (2016).	O&M Contractor	Operation
If birds nest on the infrastructure of the facility and cannot be tolerated due to operational risks of fire, electrical shorts, soiling of panels or other concerns, birds should be prevented from accessing nesting sites by using mesh or other manners of excluding them. Birds should not be shot, poisoned or harmed as this is not an effective control method and has negative ecological consequences. Birds with eggs or nestlings should be allowed to fledge their young before nests are removed.	O&M Contractor	Operation
If there are any persistent problems with avifauna, then an avifaunal specialist should be consulted for advice on further mitigation.	O&M Contractor Developer Specialist	Operation
Should any open reservoirs be required, these should be covered with fine mesh or other exclusion material in order to prevent birds from falling in and drowning.	O&M Contractor 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.	O&M Contractor	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.	O&M Contractor	Operation
Vehicle movements must be restricted to designated access roads.	O&M Contractor	Operation
Existing roads must be maintained to ensure limited erosion and impact on areas adjacent to roadways.	O&M Contractor Developer	Operation

Mitigation: Action/Control	Responsibility	Timeframe
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).	O&M Contractor Developer	Operation
Develop and implement an appropriate Stormwater Management Plan (Appendix G) for the operation phase of the facility.	O&M Contractor	Operation
No harvesting of plants for firewood, medicinal or any other purposes is to be permitted	O&M Contractor	Operation
No killing and poaching of any wild animal to be allowed. This should be clearly communicated to all employees, including subcontractors.	O&M Contractor & sub-contractor(s)	Operation
Any potentially dangerous fauna such as snakes or fauna threatened by the maintenance and operational activities must be removed to a safe location by a suitably qualified person.	O&M Contractor & sub-contractor (s)	Operation
An on-going alien plant monitoring and eradication programme (Appendix C) must be implemented, where necessary.	Developer	Operation
Undertake an annual site inspection for erosion or water flow regulation problems – with follow up remedial action where problems are identified.	Developer	Operation

Performance Indicator	<ul style="list-style-type: none"> » Limited soil erosion around site. » No further disturbance to vegetation or terrestrial faunal habitats. » No disturbance of breeding raptors, if present (i.e. no nest abandonment due to disturbance). » No disturbance of red-listed avifaunal species perched or foraging in the vicinity of the development area. » No poaching or collecting of avifauna or their products (e.g. eggs and nestlings) by maintenance personnel. » Removal to safety of entrapped/injured avifauna encountered during routine maintenance. » Low impact on nocturnal and crepuscular species along roads. » Continued improvement of rehabilitation efforts.
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. » No birds or eggs are disturbed or removed by personnel. » Perimeter fencing is maintained in a manner that ensures it is bird friendly, with respect to ground-dwelling species. » Any raptor nests (especially of red-listed species) discovered on site or nearby, are monitored weekly until post-fledging period. » Any open reservoirs on site are covered with mesh to exclude birds.

OBJECTIVE 3: Protection of avifauna

Project component/s	<ul style="list-style-type: none"> » PV panels. » Access roads.
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	<ul style="list-style-type: none"> » Cabling between project components. » Substation. » All other associated infrastructure.
Potential Impact	<ul style="list-style-type: none"> » Disturbance to or loss of birds as a result of collision with the PV panels and project components. » Destruction of habitat. » Displacement of birds. » Electrocution on power line. » Traffic to and from site.
Activity/risk source	<ul style="list-style-type: none"> » PV panels. » Substation.
Mitigation: Target/Objective	<ul style="list-style-type: none"> » More accurately determine the impact of the operating PV facility on collision-prone Red Data species. » Minimise impacts associated with the power line and the substation.

Mitigation: Action/control	Responsibility	Timeframe
Any No-go areas identified should be adhered to.	Operator	Operation phase
Lighting should be kept to a minimum to avoid attracting insects and birds, light sensors/switches should be utilised to keep lights off when not required; and	Operator	Operation phase
Lighting fixtures should be hooded and directed downward where possible, to minimize the skyward and horizontal illumination, lighting should be motion activated where possible.	Operator	Operation phase
A follow-up assessment on avian biodiversity and species abundance within the project site and surrounding areas must be conducted within one year after the facility has been in operation and should be repeated every 3-5 years.	Operator	Operation phase

Performance Indicator	<ul style="list-style-type: none"> » Minimal additional disturbance to bird populations on the PV facility site. » Continued improvement of bird protection devices, as informed by the operational monitoring.
Monitoring and Reporting	<ul style="list-style-type: none"> » Observation of avifaunal populations and incidence of injuries/death from collisions with PV panels. » Monitoring of facility and reporting where fatalities do occur.

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.

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 development area. » To avoid distribution and thickening of existing alien plants in the development area. » To complement existing alien plant eradication programs in gradually causing a significant reduction of alien plant species throughout the development area.

Mitigation: Action/Control	Responsibility	Timeframe
Develop and implement an AIP Control and Eradication Programme.	O&M Contractor	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. 	O&M Contractor	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.	O&M Contractor	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.	O&M Contractor	Operation
Any alien and invasive vegetation removed should be taken to a registered landfill site to prevent the proliferation of alien and invasive species	O&M Contractor	Operation

Performance Indicator	» Low abundance of alien plants. For each alien species: the number of plants and aerial cover of plants within the site and immediate surroundings.
Monitoring	» 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 air emissions

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.

Project Component/s	<ul style="list-style-type: none"> » Gravel 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 on gravel roads on a regular basis.	O&M Contractor	Operation
Ensure all vehicles are roadworthy and drivers are qualified and made aware of the potential noise and dust issues.	Developer	Operation
Speed of vehicles must be restricted on site to 40km/h max (for light duty vehicles) and 30km/h max for heavy duty vehicles.	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 Operations Manager. » A grievances 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** of the EMPr):

Project Component/s	» Operation and maintenance of the solar PV facility and associated infrastructure.
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 solar 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

Mitigation: Action/Control	Responsibility	Timeframe
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 associated infrastructure is complete, and disturbed areas appropriately rehabilitated. » 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. 	O&M Contractor	Operation

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 contractor 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 operation phase

The development of Red Sands PV1 will result in positive socio-economic benefits for the local communities near Upington, particularly through the creation of direct and indirect employment opportunities, which will result in an economic effect multiplier effect for the local businesses.

Project Component/s	<ul style="list-style-type: none"> » Operation and maintenance activities associated with the solar PV facility.
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 / O&M Contractor should aim to employ as many low-skilled and semi-skilled workers from the local area as possible.

	<ul style="list-style-type: none"> » 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
Where feasible, effort must be made to employ locally in order to create maximum benefit for the communities.	O&M Contractor Developer	Operation
In order to maximise the positive impact, it is suggested that the Developer (including the O&M Contractor) provide training courses for employees where feasible to ensure that employees gain as much as possible from the work experience.	Developer O&M Contractor	Operation
Facilitate the transfer of knowledge between experienced employees and the staff.	O&M Contractor	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 O&M Contractor	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. » 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: Appropriate handling and management of hazardous substances, waste and dangerous goods

The operation of the solar 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"> » On-site facility substation, 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
Spill kits must be made available on-site for the clean-up of spills and leaks of contaminants.	O&M Contractor	Operation and maintenance
Storage areas for hazardous substances must be appropriately sealed and banded.	O&M Contractor	Operation
All hazardous materials (such as used/new transformer oils, etc.) must be stored in the appropriate manner (stored in sealed containers within a clearly demarcated designated area) 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.	O&M Contractor	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.	O&M Contractor	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 banded area. Should any accidental spillage take place, it must be cleaned up according to specified standards regarding bioremediation.	O&M Contractor & sub-contractor(s)	Operation and maintenance
Disposal of waste must be in accordance with relevant legislative requirements, including the use of licensed contractors.	O&M Contractor	Operation
All food waste and litter at the site should be placed in bins with lids and removed from the site on a regular basis.	O&M Contractor	Operation
Waste handling, collection, and disposal operations must be managed and controlled by a waste management contractor.	O&M Contractor	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.	O&M Contractor	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.	O&M Contractor	Operation
General waste must be recycled where possible or disposed of at an appropriately licensed landfill.	O&M Contractor	Operation
Hazardous waste (including hydrocarbons) and general waste must be stored and disposed of separately.	O&M Contractor	Operation
Separation and recycling of different waste materials should be supported.	O&M Contractor	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, where aquatic features are affected.	O&M Contractor Developer	Operation

Mitigation: Action/Control	Responsibility	Timeframe
Immediately report significant spillages and initiate an environmental site assessment for risk assessment and remediation if necessary.	O&M Contractor	Operation
Regular quality monitoring of waste before discharge must be undertaken.	O&M Contractor	Operation
Emergency response arrangements and systems such as foam pourers, fire-fighting systems and cooperation with emergency responders must be implemented. 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.	O&M Contractor	Operation
Defective or broken PV panel must be removed and stored within a designated covered storage area prior to being removed from the site.	O&M Contractor	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. » Check vehicles and machinery monthly for oil, fuel and hydraulic oil leaks. » Undertake high standard maintenance of the vehicles and machinery. » Monitor hydrocarbon spills from vehicles and machinery during operations continuously and record the volume and nature of the spill, location and clean up actions. » Analyse soil samples for pollution in areas of known spills or where a breach of containment is evident. » Records of accidental spills and clean-up procedures and the results thereof must be audited by the EO & Environmental Manager during the operation phase. » Waste documentation must be completed and made available for inspection. » An incidents/grievances 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 Contractor. » All appropriate waste disposal certificates accompany the monthly reports.

CHAPTER 9: MANAGEMENT PROGRAMME: DECOMMISSIONING

The lifespan of the proposed Red Sands PV1 facility will be more than 20 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 Red Sands PV1 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 BA 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 Red Sands PV1 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.
- » Where not possible to recycle, materials should be appropriately disposed of.
- » 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 solar 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 solar 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 development area 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.
- » Bird nests, eggs or nestlings are not disturbed or removed by personnel.
- » Any raptor nests (especially of red-listed species) discovered on site or nearby, are monitored weekly to ensure zero disturbances.

APPENDIX A

CURRICULUM VITAE OF JANA DE JAGER

Profession : Environmental Assessment Practitioner

Specialisation: Environmental Assessments, report writing, and GIS

Work Experience: 4 years' experience in Environmental Assessments & GIS

VOCATIONAL EXPERIENCE

Professional execution of consulting services for projects in the environmental management field, specialising in Environmental Impact Assessments, GIS mapping and screening assessments water use authorisations and assessments, environmental permitting, public participation, compilation of Environmental Management Plans and Programmes, and integrated environmental management. Responsibilities include report writing, compilation of project specific mapping, project management, review of specialist studies and the identification and assessment of potential negative environmental impacts and benefits. Compilation of the reports for environmental studies is in accordance with all relevant environmental legislation.

Experience in conducting environmental impact assessments for energy developments, industrial manufacturing projects (asphalt plants), waste treatment projects (HCRW), and water use licensing for Mixed-Use Developments.

SKILLS BASE AND CORE COMPETENCIES

- Compilation of environmental impact assessment reports and environmental management programmes in accordance with relevant environmental legislative requirements;
- GIS analysis and mapping as per project specifications

EDUCATION AND PROFESSIONAL STATUS

Degrees:

- B.Sc. (Hons) Environmental Science & Geography (2017), University of Pretoria (UP)
- B.Sc. Environmental Science (2016), University of Pretoria (UP)

Short Courses:

- Beginning Project Management: Project Management Level 1 (2020) – Joseph Phillips (Udemy)
- CBSS Water Governance Training Course (2019) – Carin Bosman, Water use governance Specialist
- Environmental Law Update Workshop (2018) – IMBEWU Sustainability Legal Specialists
- Official DWS Section 21 (c) and (i) Water Use Authorisation Course (2018)- Dr Wietsche Roets, Specialist Scientist: (In Stream Water Use);

Professional Society Affiliations:

- South African Council for Natural Scientific Professionals - Candidate Natural Scientist: Environmental Scientist – Reg No. 120039

Other Relevant Skills:

- Water Use Licensing on EWULAAS
- Compiling project budgets and proposals

EMPLOYMENT

Date	Company	Roles and Responsibilities
01 September 2020 - Current:	Savannah Environmental (Pty) Ltd	<p><i>Environmental Assessment Practitioner & GIS Consultant</i></p> <p><u>Tasks include:</u> <i>Compilation of Environmental Impact Assessment (EIA) reports; Basic Assessment (BA) reports and Environmental Management Programmes; Environmental Screening reports; GIS mapping; Co-ordination of the public participation process; Project management; project proposals and tenders; Client liaison and Marketing; Process EIA Applications.</i></p>
16 January 2018 – 29 August 2020	AquaEco	<p><i>Junior Environmental Consultant</i></p> <p><u>Tasks included:</u> <i>Drafting Environmental Applications; Basic Assessment & Environmental Impact Assessment Reports, and EMPs for review; assisting in environmental audits. Public participation liaison. Loading Water Use Licence information onto E-WUULAS system</i></p>

PROJECT EXPERIENCE

Jana has experience in undertaking environmental impact assessments for energy sector projects, industrial manufacturing projects (asphalt plants), waste treatment projects (HCRW), and water use licensing for Mixed-Use Developments. She also has experience in undertaking consulting work and environmental permitting for IPP bid submission and compiling environmental screening assessments and project specific mapping using various GIS software and tools.

ENERGY PROJECTS

Basic Assessments

Project Name & Location	Client Name	Role
Establishment of various infrastructure at the Msenge Emoyeni WEF	Amakhala Emoyeni Renewable Energy (Pty) Ltd	Junior EAP GIS
132kV Transmission infrastructure for the 320MW RMPP, Richards Bay, KwaZulu Natal	Phinda Power Producers (Pty) Ltd	Junior EAP GIS
132kV power line for Hyperion Hybrid Facility	Hyperion Solar Hybrid (Pty) Ltd	Junior EAP (Principal author) GIS
Grid Connection Infrastructure for the Frontier Power Gas to Power Plant, Saldanha Bay.	Frontier Power (Pty) Ltd	Junior EAP (Principal author) GIS
Roggeveld Wind Farm Access Road	Roggeveld Wind Power (Pty) Ltd	Junior EAP (Principal author) GIS
Woodhouse PVs Grid Connection Infrastructure	Genesis Eco-Energy (Pty) Ltd	Junior EAP (Principal author) GIS

Environmental Impact Assessments

Project Name & Location	Client Name	Role
320MW Risk Mitigation Power Plant, Richards Bay, KwaZulu Natal	Phinda Power Producers (Pty) Ltd	Junior EAP (Principal author) GIS
Hyperion Hybrid Power Plant, Northern Cape	Hyperion Solar Hybrid (Pty) Ltd	Junior EAP (Principal author) GIS
Kotulo Tsatsi Energy PV1, Northern Cape Province	Kotulo Tsatsi Energy (Pty) Ltd	Junior EAP (Principal author) GIS
Bergriver Wind Farm, Western Cape Province	FE Bergriver (Pty) Ltd	Project Management Principal author GIS
Houthaalboomen PV Cluster, North West Province	Barleria PV (Pty) Ltd Setaria PV (Pty) Ltd Dicoma PV (Pty) Ltd	Project Management GIS
Phakwe Richards Bay Gas Power 3 CCPP, KwaZulu Natal Province	Phakwe Richards Bay Gas Power 3 (Pty) Ltd	Project Management Principal author GIS

EA Amendments (Part 2)

Project Name & Location	Client Name	Role
Part 2 Amendment for the Namas and Zonnequa Wind Farms Grid Connection Infrastructure	Namas Wind (Pty)Ltd	Junior EAP (Principal author) GIS

Screening Assessments

Project Name & Location	Client Name	Role
Environmental Feasibility Screening Assessment for the Vogelstruis Renewable Energy Development, Vredendal, Western Cape	ABO Wind (Pty) Ltd	Principal author GIS
Environmental Feasibility Screening Assessment for the Kheis and Danielskuil Renewable Energy Developments, Northern Cape	AGV Projects (Pty) Ltd	Principal author GIS

Compliance Advise and Environmental Permitting

Project Name	Client Name	Role
Kotulo Tsatsi Energy	Kotulo Tsatsi Energy (Pty) Ltd	Environmental Consultant
Namas & Zonnequa Wind Farms	Atlantic Energy Partners (Pty) Ltd	Environmental Consultant
Kabi Solar Projects	Kabi Solar (Pty) Ltd	Environmental Consultant

OTHER SECTORS

Environmental Impact Assessments and Environmental Management Programmes

Project Name & Location	Client Name	Role
Atholl Square Construction Environmental Management Programme	PIC	EMPr Author
Roadspan Asphalt Plant, Belfast, Mpumalanga	Roadspan Surfaces	Junior EAP
Rooiberg Asphalt Plant, Pretoria Gauteng	Rooiberg Asphalt	Junior EAP

Basic Assessments

Project Name & Location	Client Name	Role
Buhle Waste HCRW Treatment Plant	Buhle Waste	Junior EAP

Environmental Compliance, Auditing and ECO

Project Name & Location	Client Name	Role
TRAC N4 Toll Route Annual Audit	TRAC N4	Assistant Auditor
TRAC N4 Toll Route Annual Water Sampling	TRAC N4	ECO

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

Project Name & Location	Client Name	Role
Midrand Aquaculture Facility GEMF Registration	Private	Junior EAP
Kapama Game Reserve – WULA	Kapama Game Reserve	Junior EAP
Marataba Safari Lodge – WULA	Marataba Safari Lodge	Junior EAP
Lapalala Game Reserve – GA registration	Lapalala Game Reserve	Junior EAP
Ngwenya Lodge – WULA	Ngwenya Lodge	Junior EAP

CURRICULUM VITAE OF JO-ANNE THOMAS

Profession:	Environmental Management and Compliance Consultant; Environmental Assessment Practitioner
Specialisation:	Environmental Management; Strategic environmental advice; Environmental compliance advice & monitoring; Environmental Impact Assessments; Policy, strategy & guideline formulation; Project Management; General Ecology
Work experience:	Twenty four (24) years in the environmental field

VOCATIONAL EXPERIENCE

Provide technical input for projects in the environmental management field, specialising in Strategic Environmental Advice, Environmental Impact Assessment studies, environmental auditing and monitoring, environmental permitting, public participation, Environmental Management Plans and Programmes, environmental policy, strategy and guideline formulation, and integrated environmental management. Key focus on integration of the specialist environmental studies and findings into larger engineering-based projects, strategic assessment, and providing practical and achievable environmental management solutions and mitigation measures. Responsibilities for environmental studies include project management (including client and authority liaison and management of specialist teams); review and manipulation of data; identification and assessment of potential negative environmental impacts and benefits; review of specialist studies; and the identification of mitigation measures. Compilation of the reports for environmental studies is in accordance with all relevant environmental legislation.

Undertaking of numerous environmental management studies has resulted in a good working knowledge of environmental legislation and policy requirements. Recent projects have been undertaken for both the public- and private-sector, including compliance advice and monitoring, electricity generation and transmission projects, various types of linear developments (such as National Road, local roads and power lines), waste management projects (landfills), mining rights and permits, policy, strategy and guideline development, as well as general environmental planning, development and management.

SKILLS BASE AND CORE COMPETENCIES

- Project management for a range of projects
- Identification and assessment of potential negative environmental impacts and benefits through the review and manipulation of data and specialist studies
- Identification of practical and achievable mitigation and management measures and the development of appropriate management plans
- Compilation of environmental reports in accordance with relevant environmental legislative requirements
- External and peer review of environmental reports & compliance advice and monitoring
- Formulation of environmental policies, strategies and guidelines
- Strategic and regional assessments; pre-feasibility & site selection
- Public participation processes for a variety of projects
- Strategic environmental advice to a wide variety of clients both in the public and private sectors
- Working knowledge of environmental planning processes, policies, regulatory frameworks and legislation

EDUCATION AND PROFESSIONAL STATUS

Degrees:

- B.Sc Earth Sciences, University of the Witwatersrand, Johannesburg (1993)
- B.Sc Honours in Botany, University of the Witwatersrand, Johannesburg (1994)
- M.Sc in Botany, University of the Witwatersrand, Johannesburg (1996)

Short Courses:

- Environmental Impact Assessment, Potchefstroom University (1998)
- Environmental Law, Morgan University (2001)
- Environmental Legislation, IMBEWU (2017)
- Mining Legislation, Cameron Cross & Associates (2013)
- Environmental and Social Risk Management (ESRM), International Finance Corporation (2018)

Professional Society Affiliations:

- Registered EAP with the Environmental Assessment Practitioners Association of South Africa (EAPASA) (2019/726)
- Registered with the South African Council for Natural Scientific Professions as a Professional Natural Scientist: Environmental Scientist (400024/00)
- Registered with the International Association for Impact Assessment South Africa (IAIASa): 5601
- Member of the South African Wind Energy Association (SAWEA)

EMPLOYMENT

Date	Company	Roles and Responsibilities
January 2006 - Current:	Savannah Environmental (Pty) Ltd	Director Project manager Independent specialist environmental consultant, Environmental Assessment Practitioner (EAP) and advisor.
1997 – 2005:	Bohlweki Environmental (Pty) Ltd	Senior Environmental Scientist at. Environmental Management and Project Management
January – July 1997:	Sutherland High School, Pretoria	Junior Science Teacher

PROJECT EXPERIENCE

Project experience includes large infrastructure projects, including electricity generation and transmission, wastewater treatment facilities, mining and prospecting activities, property development, and national roads, as well as strategy and guidelines development.

RENEWABLE POWER GENERATION PROJECTS: PHOTOVOLTAIC SOLAR ENERGY FACILITIES

Environmental Impact Assessments and Environmental Management Programmes

Project Name & Location	Client Name	Role
Christiana PV 2 SEF, North West	Solar Reserve South Africa	Project Manager & EAP
De Aar PV facility, Northern Cape	iNca Energy	Project Manager & EAP
Everest SEF near Hennenman, Free State	FRV Energy South Africa	Project Manager & EAP
Graafwater PV SEF, Western Cape	iNca Energy	Project Manager & EAP
Grootkop SEF near Allanridge, Free State	FRV Energy South Africa	Project Manager & EAP
Hertzogville PV 2 SEF with 2 phases, Free State	SunCorp / Solar Reserve	Project Manager & EAP

Project Name & Location	Client Name	Role
Karoshhoek CPV facility on site 2 as part of the larger Karoshhoek Solar Valley Development East of Upington, Northern Cape	FG Emvelo	Project Manager & EAP
Kgabalatsane SEF North-East for Brits, North West	Built Environment African Energy Services	Project Manager & EAP
Kleinbegin PV SEF West of Groblershoop, Northern Cape	MedEnergy Global	Project Manager & EAP
Lethabo Power Station PV Installation, Free State	Eskom Holdings SoC Limited	Project Manager & EAP
Majuba Power Station PV Installation, Mpumalanga	Eskom Holdings SoC Limited	Project Manager & EAP
Merapi PV SEF Phase 1 – 4 South-East of Excelsior, Free State	SolaireDirect Southern Africa	Project Manager & EAP
Sannaspos Solar Park, Free State	SolaireDirect Southern Africa	Project Manager & EAP
Ofir-Zx PV Plant near Keimoes, Northern Cape	S28 Degrees Energy	Project Manager & EAP
Oryx SEF near Virginia, Free State	FRV Energy South Africa	Project Manager & EAP
Project Blue SEF North of Kleinsee, Northern Cape	WWK Development	Project Manager & EAP
S-Kol PV Plant near Keimoes, Northern Cape	S28 Degrees Energy	Project Manager & EAP
Sonnenberg PV Plant near Keimoes, Northern Cape	S28 Degrees Energy	Project Manager & EAP
Tutuka Power Station PV Installation, Mpumalanga	Eskom Transmission	Project Manager & EAP
Two PV sites within the Northern Cape	MedEnergy Global	Project Manager & EAP
Two PV sites within the Western & Northern Cape	iNca Energy	Project Manager & EAP
Upington PV SEF, Northern Cape	MedEnergy Global	Project Manager & EAP
Vredendal PV facility, Western Cape	iNca Energy	Project Manager & EAP
Waterberg PV plant, Limpopo	Thupela Energy	Project Manager & EAP
Watershed Phase I & II SEF near Litchtenburg, North West	FRV Energy South Africa	Project Manager & EAP
Alldays PV & CPV SEF Phase 1, Limpopo	BioTherm Energy	Project Manager & EAP
Hyperion PV Solar Development 1, 2, 3, 4, 5 & 6, Northern Cape	Building Energy	Project Manager & EAP
Vrede & Rondavel PV, Free State	Mainstream Renewable Energy Developments	Project Manager & EAP

Basic Assessments

Project Name & Location	Client Name	Role
Aberdeen PV SEF, Eastern Cape	BioTherm Energy	Project Manager & EAP
Christiana PV 1 SEF on Hartebeestpan Farm, North-West	Solar Reserve South Africa	Project Manager & EAP
Heuningspruit PV1 & PV 2 facilities near Koppies, Free State	Sun Mechanics	Project Manager & EAP
Kakamas PV Facility, Northern Cape	iNca Energy	Project Manager & EAP
Kakamas II PV Facility, Northern Cape	iNca Energy	Project Manager & EAP
Machadodorp 1 PV SEF, Mpumalanga	Solar To Benefit Africa	Project Manager & EAP
PV site within the Northern Cape	iNca Energy	Project Manager & EAP
PV sites within 4 ACSA airports within South Africa, National	Airports Company South Africa (ACSA)	Project Manager & EAP
RustMo1 PV Plant near Buffelspoort, North West	Momentous Energy	Project Manager & EAP
RustMo2 PV Plant near Buffelspoort, North West	Momentous Energy	Project Manager & EAP
RustMo3 PV Plant near Buffelspoort, North West	Momentous Energy	Project Manager & EAP
RustMo4 PV Plant near Buffelspoort, North West	Momentous Energy	Project Manager & EAP

Project Name & Location	Client Name	Role
Sannaspos PV SEF Phase 2 near Bloemfontein, Free State	SolaireDirect Southern Africa	Project Manager & EAP
Solar Park Expansion within the Rooiwal Power Station, Gauteng	AFRKO Energy	Project Manager & EAP
Steynsrus SEF, Free State	SunCorp	Project Manager & EAP
Sirius Solar PV Project Three and Sirius Solar PV Project Four (BA in terms of REDZ regulations), Northern Cape	SOLA Future Energy	Project Manager & EAP
Northam PV, Limpopo Province	Northam Platinum	Project Manager & EAP
Kolkies PV Suite (x 6 projects) and Sadawa PV Suite (x 4 projects), Western Cape	Mainstream Renewable Energy Developments	Project Manager & EAP

Screening Studies

Project Name & Location	Client Name	Role
Allemans Fontein SEF near Noupoot, Northern Cape	Fusion Energy	Project Manager & EAP
Amandel SEF near Thabazimbi, Limpopo	iNca Energy	Project Manager & EAP
Arola/Doomplaat SEF near Ventersdorp, North West	FRV & iNca Energy	Project Manager & EAP
Bloemfontein Airport PV Installation, Free State	The Power Company	Project Manager & EAP
Brakspuit SEF near Klerksorp, North West	FRV & iNca Energy	Project Manager & EAP
Carolus Poort SEF near Noupoot, Northern Cape	Fusion Energy	Project Manager & EAP
Damfontein SEF near Noupoot, Northern Cape	Fusion Energy	Project Manager & EAP
Everest SEF near Welkom, Free State	FRV & iNca Energy	Project Manager & EAP
Gillmer SEF near Noupoot, Northern Cape	Fusion Energy	Project Manager & EAP
Grootkop SEF near Allansridge, Free State	FRV & iNca Energy	Project Manager & EAP
Heuningspruit PV1 & PV 2 near Koppies, Free State	Cronimat	Project Manager & EAP
Kimberley Airport PV Installation, Northern Cape	The Power Company	Project Manager & EAP
Kolonnade Mall Rooftop PV Installation in Tshwane, Gauteng	Momentous Energy	Project Manager & EAP
Loskop SEF near Groblersdal, Limpopo	S&P Power Unit	Project Manager & EAP
Marble SEF near Marble Hall, Limpopo	S&P Power Unit	Project Manager & EAP
Morgenson PV1 SEF South-West of Windsorton, Northern Cape	Solar Reserve South Africa	Project Manager & EAP
OR Tambo Airport PV Installation, Gauteng	The Power Company	Project Manager & EAP
Oryx SEF near Virginia, Free State	FRV & iNca Energy	Project Manager & EAP
Rhino SEF near Vaalwater, Limpopo	S&P Power Unit	Project Manager & EAP
Rustmo2 PV Plant near Buffelspoort, North West	Momentous Energy	Project Manager & EAP
Spitskop SEF near Northam, Limpopo	FRV & iNca Energy	Project Manager & EAP
Steynsrus PV, Free State	Suncorp	Project Manager & EAP
Tabor SEF near Polokwane, Limpopo	FRV & iNca Energy	Project Manager & EAP
Upington Airport PV Installation, Northern Cape	The Power Company	Project Manager & EAP
Valeria SEF near Hartebeestpoort Dam, North West	Solar to Benefit Africa	Project Manager & EAP
Watershed SEF near Lichtenburg, North West	FRV & iNca Energy	Project Manager & EAP
Witkop SEF near Polokwane, Limpopo	FRV & iNca Energy	Project Manager & EAP
Woodmead Retail Park Rooftop PV Installation, Gauteng	Momentous Energy	Project Manager & EAP

Environmental Compliance, Auditing and ECO

Project Name & Location	Client Name	Role
ECO and bi-monthly auditing for the construction of the Adams Solar PV Project Two South of Hotazel,	Enel Green Power	Project Manager

Project Name & Location	Client Name	Role
Northern Cape		
ECO for the construction of the Kathu PV Facility, Northern Cape	REISA	Project Manager
ECO and bi-monthly auditing for the construction of the Pulida PV Facility, Free State	Enel Green Power	Project Manager
ECO for the construction of the RustMo1 SEF, North West	Momentous Energy	Project Manager
ECO for the construction of the Sishen SEF, Northern Cape	Windfall 59 Properties	Project Manager
ECO for the construction of the Upington Airport PV Facility, Northern Cape	Sublunary Trading	Project Manager
Quarterly compliance monitoring of compliance with all environmental licenses for the operation activities at the Kathu PV facility, Northern Cape	REISA	Project Manager
ECO for the construction of the Konkoonies II PV SEF and associated infrastructure, Northern Cape	BioTherm Energy	Project Manager
ECO for the construction of the Aggeneys PV SEF and associated infrastructure, Northern Cape	BioTherm Energy	Project Manager

Compliance Advice and ESAP Reporting

Project Name & Location	Client Name	Role
Aggeneys Solar Farm, Northern Cape	BioTherm Energy	Environmental Advisor
Airies II PV Facility SW of Kenhardt, Northern Cape	BioTherm Energy	Environmental Advisor
Kalahari SEF Phase II in Kathu, Northern Cape	Engle	Environmental Advisor
Kathu PV Facility, Northern Cape	Building Energy	Environmental Advisor
Kenhardt PV Facility, Northern Cape	BioTherm Energy	Environmental Advisor
Kleinbegin PV SEF West of Groblershoop, Northern Cape	MedEnergy	Environmental Advisor
Konkoonies II SEF near Pofadder, Northern Cape	BioTherm Energy	Environmental Advisor
Konkoonies Solar Farm, Northern Cape	BioTherm Energy	Environmental Advisor
Lephalale SEF, Limpopo	Exxaro	Environmental Advisor
Pixley ka Seme PV Park, South-East of De Aar, Northern Cape	African Clean Energy Developments (ACED)	Environmental Advisor
RustMo1 PV Plant near Buffelspoort, North West	Momentous Energy	Environmental Advisor
Scuitdrift 1 SEF & Scuitdrift 2 SEF, Limpopo	Building Energy	Environmental Advisor
Sirius PV Plants, Northern Cape	Aurora Power Solutions	Environmental Advisor
Upington Airport PV Power Project, Northern Cape	Sublunary Trading	Environmental Advisor
Upington SEF, Northern Cape	Abengoa Solar	Environmental Advisor
Ofir-ZX PV SEF near Keimoes, Northern Cape	Network S28 Energy	Environmental Advisor
Environmental Permitting for the Steynsrus PV1 & PV2 SEF's, Northern Cape	Cronimet Power Solutions	Environmental Advisor
Environmental Permitting for the Heuningspruit PV SEF, Northern Cape	Cronimet Power Solutions	Environmental Advisor

Due Diligence Reporting

Project Name & Location	Client Name	Role
5 PV SEF projects in Lephalale, Limpopo	iNca Energy	Environmental Advisor
Prieska PV Plant, Northern Cape	SunEdison Energy India	Environmental Advisor
Sirius Phase One PV Facility near Upington, Northern Cape	Aurora Power Solutions	Environmental Advisor

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

Project Name & Location	Client Name	Role
Biodiversity Permit & WULA for the Aggeneys SEF near Aggeneys, Northern Cape	BioTherm Energy	Project Manager & EAP
Biodiversity Permit for the Konkoonises II SEF near Pofadder, Northern Cape	BioTherm Energy	Project Manager & EAP
Biodiversity Permitting for the Lephalale SEF, Limpopo	Exxaro Resources	Project Manager & EAP
Environmental Permitting for the Kleinbegin PV SEF West of Groblershoop, Northern Cape	MedEnergy	Project Manager & EAP
Environmental Permitting for the Upington SEF, Northern Cape	Abengoa Solar	Project Manager & EAP
Environmental Permitting for the Kathu PV Facility, Northern Cape	Building Energy	Project Manager & EAP
Environmental Permitting for the Konkoonises Solar Farm, Northern Cape	BioTherm Energy	Project Manager & EAP
Environmental Permitting for the Lephalale SEF, Limpopo	Exxaro Resources	Project Manager & EAP
Environmental Permitting for the Scuitdrift 1 SEF & Scuitdrift 2 SEF, Limpopo	Building Energy	Project Manager & EAP
Environmental Permitting for the Sirius PV Plant, Northern Cape	Aurora Power Solutions	Project Manager & EAP
Environmental Permitting for the Steynsrus PV1 & PV2 SEF's, Northern Cape	Cronimet Power Solutions	Project Manager & EAP
Environmental Permitting for the Heuningspruit PV SEF, Northern Cape	Cronimet Power Solutions	Project Manager & EAP
Permits for the Kleinbegin and UAP PV Plants, Northern Cape	MedEnergy Global	Project Manager & EAP
S53 Application for Arriesfontein Solar Park Phase 1 – 3 near Danielskuil, Northern Cape	Solar Reserve / SunCorp	Project Manager & EAP
S53 Application for Hertzogville PV1 & PV 2 SEFs, Free State	Solar Reserve / SunCorp	Project Manager & EAP
S53 Application for the Bloemfontein Airport PV Facility, Free State	Sublunary Trading	Project Manager & EAP
S53 Application for the Kimberley Airport PV Facility, Northern Cape	Sublunary Trading	Project Manager & EAP
S53 Application for the Project Blue SEF, Northern Cape	WWK Developments	Project Manager & EAP
S53 Application for the Upington Airport PV Facility, Free State	Sublunary Trading	Project Manager & EAP
WULA for the Kalahari SEF Phase II in Kathu, Northern Cape	Engie	Project Manager & EAP

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

Project Name & Location	Client Name	Role
Ilanga CSP 2, 3, 4, 5, 7 & 9 Facilities near Upington, Northern Cape	Emvelo Holdings	Project Manager & EAP
Ilanga CSP near Upington, Northern Cape	Ilangehu Energy	Project Manager & EAP

Project Name & Location	Client Name	Role
Ilanga Tower 1 Facility near Upington, Northern Cape	Emvelo Holdings	Project Manager & EAP
Karoshhoek CPVPD 1-4 facilities on site 2 as part of the larger Karoshhoek Solar Valley Development East of Upington, Northern Cape	FG Emvelo	Project Manager & EAP
Karoshhoek CSP facilities on sites 1.4; 4 & 5 as part of the larger Karoshhoek Solar Valley Development East of Upington, Northern Cape	FG Emvelo	Project Manager & EAP
Karoshhoek Linear Fresnel 1 Facility on site 1.1 as part of the larger Karoshhoek Solar Valley Development East of Upington, Northern Cape	FG Emvelo	Project Manager & EAP

Environmental Compliance, Auditing and ECO

Project Name & Location	Client Name	Role
ECO for the construction of the !Khi CSP Facility, Northern Cape	Abengoa Solar	Project Manager
ECO for the construction of the Ilanga CSP 1 Facility near Upington, Northern Cape	Karoshhoek Solar One	Project Manager
ECO for the construction of the folar Park, Northern Cape	Kathu Solar	Project Manager
ECO for the construction of the KaXu! CSP Facility, Northern Cape	Abengoa Solar	Project Manager
Internal audit of compliance with the conditions of the IWUL issued to the Karoshhoek Solar One CSP Facility, Northern Cape	Karoshhoek Solar One	Project Manager

Screening Studies

Project Name & Location	Client Name	Role
Upington CSP (Tower) Plant near Kanoneiland, Northern Cape	iNca Energy and FRV	Project Manager & EAP

Compliance Advice and ESAP reporting

Project Name & Location	Client Name	Role
Ilanga CSP Facility near Upington, Northern Cape	Ilangethu Energy	Environmental Advisor
Ilangaletu CSP 2, Northern Cape	FG Emvelo	Environmental Advisor
Kathu CSP Facility, Northern Cape	GDF Suez	Environmental Advisor
Lephalale SEF, Limpopo	Cennergi	Environmental Advisor
Solis I CSP Facility, Northern Cape	Brightsource	Environmental Advisor

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

Project Name & Location	Client Name	Role
Environmental Permitting for the Ilanga CSP Facility near Upington, Northern Cape	Ilangethu Energy	Project Manager & EAP
Environmental Permitting for the Kathu CSP, Northern Cape	GDF Suez	Project Manager & EAP
WULA for the Solis I CSP Facility, Northern Cape	Brightsource	Project Manager & EAP

RENEWABLE POWER GENERATION PROJECTS: WIND ENERGY FACILITIES

Environmental Impact Assessments and Environmental Management Programmes

Project Name & Location	Client Name	Role
Sere WEF, Western Cape	Eskom Holdings SoC Limited	EAP
Aberdeen WEF, Eastern Cape	Eskom Holdings SoC Limited	Project Manager & EAP
Amakhala Emoyeni WEF, Eastern Cape	Windlab Developments	Project Manager & EAP
EXXARO West Coast WEF, Western Cape	EXXARO Resources	Project Manager & EAP
Goereesoe Wind Farm near Swellendam, Western Cape	iNca Energy	Project Manager & EAP
Hartneest WEF, Western Cape	Juwi Renewable Energies	Project Manager & EAP
Hopefield WEF, Western Cape	Umoya Energy	EAP
Kleinsee WEF, Northern Cape	Eskom Holdings SoC Limited	Project Manager & EAP
Klipheuwel/Dassiesfontein WEF within the Overberg area, Western Cape	BioTherm Energy	Project Manager & EAP
Moorreesburg WEF, Western Cape	iNca Energy	Project Manager & EAP
Oyster Bay WEF, Eastern Cape	Renewable Energy Resources Southern Africa	Project Manager & EAP
Project Blue WEF, Northern Cape	Windy World	Project Manager & EAP
Rheboksfontein WEF, Western Cape	Moyeng Energy	Project Manager & EAP
Spitskop East WEF near Riebeeck East, Eastern Cape	Renewable Energy Resources Southern Africa	Project Manager & EAP
Suurplaat WEF, Western Cape	Moyeng Energy	Project Manager & EAP
Swellendam WEF, Western Cape	IE Swellendam	Project Manager & EAP
Tsitsikamma WEF, Eastern Cape	Exxarro	Project Manager & EAP
West Coast One WEF, Western Cape	Moyeng Energy	Project Manager & EAP

Basic Assessments

Project Name & Location	Client Name	Role
Amakhala Emoyeni Wind Monitoring Masts, Eastern Cape	Windlab Developments	Project Manager & EAP
Beaufort West Wind Monitoring Masts, Western Cape	Umoya Energy	Project Manager & EAP
Hopefield Community Wind Farm near Hopefield, Western Cape	Umoya Energy	Project Manager & EAP
Koekenaap Wind Monitoring Masts, Western Cape	EXXARO Resources	Project Manager & EAP
Koingnaas WEF, Northern Cape	Just Palm Tree Power	Project Manager & EAP
Laingsburg Area Wind Monitoring Masts, Western Cape	Umoya Energy	Project Manager & EAP
Overberg Area Wind Monitoring Masts, Western Cape	BioTherm Energy	Project Manager & EAP
Oyster Bay Wind Monitoring Masts, Eastern Cape	Renewable Energy Systems Southern Africa (RES)	Project Manager & EAP
Wind Garden & Fronteer WEFs, Eastern Cape	Wind Relc	Project Manager & EAP

Screening Studies

Project Name & Location	Client Name	Role
Albertinia WEF, Western Cape	BioTherm Energy	Project Manager & EAP
Koingnaas WEF, Northern Cape	Just Pal Tree Power	Project Manager & EAP
Napier Region WEF Developments, Western Cape	BioTherm Energy	Project Manager & EAP
Tsitsikamma WEF, Eastern Cape	Exxarro Resources	Project Manager & EAP

Project Name & Location	Client Name	Role
Various WEFs within an identified area in the Overberg area, Western Cape	BioTherm Energy	Project Manager & EAP
Various WEFs within an identified area on the West Coast, Western Cape	Investec Bank Limited	Project Manager & EAP
Various WEFs within an identified area on the West Coast, Western Cape	Eskom Holdings Limited	Project Manager & EAP
Various WEFs within the Western Cape	Western Cape Department of Environmental Affairs and Development Planning	Project Manager & EAP
Velddrift WEF, Western Cape	VentuSA Energy	Project Manager & EAP
Wind 1000 Project	Thabo Consulting on behalf of Eskom Holdings	Project Manager & EAP
Wittekleibosch, Snylip & Doriskraal WEFs, Eastern Cape	Exxaro Resources	Project Manager & EAP

Environmental Compliance, Auditing and ECO

Project Name & Location	Client Name	Role
ECO for the construction of the West Coast One WEF, Western Cape	Aurora Wind Power	Project Manager
ECO for the construction of the Gouda WEF, Western Cape	Blue Falcon	Project Manager
EO for the Dassiesklip Wind Energy Facility, Western Cape	Group 5	Project Manager
Quarterly compliance monitoring of compliance with all environmental licenses for the operation activities at the Gouda Wind Energy facility near Gouda, Western Cape	Blue Falcon	Project Manager
Annual auditing of compliance with all environmental licenses for the operation activities at the West Coast One Wind Energy facility near Vredenburg, Western Cape	Aurora Wind Power	Project Manager
External environmental and social audit for the Amakhala Wind Farm, Eastern Cape	Cennergi	Project Manager
External environmental and social audit for the Tsitsikamma Wind Farm, Eastern Cape	Cennergi	Project Manager
ECO for the construction of the Excelsior Wind Farm and associated infrastructure, Northern Cape	BioTherm Energy	Project Manager
External compliance audit of the Dassiesklip Wind Energy Facility, Western Cape	BioTherm Energy	Project Manager

Compliance Advice

Project Name & Location	Client Name	Role
Amakhala Phase 1 WEF, Eastern Cape	Cennergi	Environmental Advisor
Dassiesfontein WEF within the Overberg area, Western Cape	BioTherm Energy	Environmental Advisor
Excelsior Wind Farm, Western Cape	BioTherm Energy	Environmental Advisor
Great Karoo Wind Farm, Northern Cape	African Clean Energy Developments (ACED)	Environmental Advisor
Hopefield Community WEF, Western Cape	African Clean Energy Developments (ACED)	Environmental Advisor

Rheboksfontein WEF, Western Cape	Moyeng Energy	Environmental Advisor
Tiqua WEF, Western Cape	Cennergi	Environmental Advisor
Tsitsikamma WEF, Eastern Cape	Cennergi	Environmental Advisor
West Coast One WEF, Western Cape	Moyeng Energy	Environmental Advisor

Due Diligence Reporting

Project Name & Location	Client Name	Role
Witteberg WEF, Western Cape	EDPR Renewables	Environmental Advisor
IPD Vredenburg WEF within the Saldanha Bay area, Western Cape	IL&FS Energy Development Company	Environmental Advisor

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

Project Name & Location	Client Name	Role
Biodiversity Permitting for the Power Line between the Tsitsikamma Community WEF & the Diep River Substation, Eastern Cape	Cennergi	Project Manager & EAP
Biodiversity Permitting for the West Coast One WEF, Western Cape	Aurora Wind Power	Project Manager & EAP
Environmental Permitting for the Excelsior WEF, Western Cape	BioTherm Energy	Project Manager & EAP
Plant Permits & WULA for the Tsitsikamma Community WEF, Eastern Cape	Cennergi	Project Manager & EAP
S24G and WULA for the Rectification for the commencement of unlawful activities on Ruimsig AH in Honeydew, Gauteng	Hossam Soror	Project Manager & EAP
S24G Application for the Rheboksfontein WEF, Western Cape	Ormonde - Theo Basson	Project Manager & EAP
S53 Application & WULA for Suurplaat and Gemini WEFs, Northern Cape	Engie	Project Manager & EAP
S53 Application for the Hopefield Community Wind Farm near Hopefield, Western Cape	Umoya Energy	Project Manager & EAP
S53 Application for the Project Blue WEF, Northern Cape	WWK Developments	Project Manager & EAP
S53 for the Oyster Bay WEF, Eastern Cape	RES	Project Manager & EAP
WULA for the Great Karoo Wind Farm, Northern Cape	African Clean Energy Developments (ACED)	Project Manager & EAP

CONVENTIONAL POWER GENERATION PROJECTS (COAL)

Environmental Impact Assessments and Environmental Management Programmes

Project Name & Location	Client Name	Role
Mutsho Power Station near Makhado, Limpopo	Mutsho Consortium	Project Manager & EAP
Coal-fired Power Station near Ogies, Mpumalanga	Ruukki SA	Project Manager & EAP
Thabametsi IPP Coal-fired Power Station, near Lephalale, Limpopo	Axia	Project Manager & EAP
Transalloys Coal-fired Power Station, Mpumalanga	Transalloys	Project Manager & EAP
Tshivasho IPP Coal-fired Power Station (with WML), near Lephalale, Limpopo	Cennergi	Project Manager & EAP
Umbani Coal-fired Power Station, near Kriel, Mpumalanga	ISS Global Mining	Project Manager & EAP

Project Name & Location	Client Name	Role
Waterberg IPP Coal-Fired Power Station near Lephalale, Limpopo	Exxaro Resources	Project Manager & EAP

Basic Assessments

Project Name & Location	Client Name	Role
Coal Stockyard on Medupi Ash Dump Site, Limpopo	Eskom Holdings	Project Manager & EAP
Biomass Co-Firing Demonstration Facility at Arnot Power Station East of Middleburg, Mpumlanaga	Eskom Holdings	Project Manager & EAP

Screening Studies

Project Name & Location	Client Name	Role
Baseload Power Station near Lephalale, Limpopo	Cennergi	Project Manager & EAP
Coal-Fired Power Plant near Delmas, Mpumalanga	Exxaro Resources	Project Manager & EAP
Makhado Power Station, Limpopo	Mutsho Consortium, Limpopo	Project Manager & EAP

Environmental Compliance, Auditing and ECO

Project Name & Location	Client Name	Role
ECO for the Camden Power Station, Mpumalanga	Eskom Holdings	Project Manager

Compliance Advice

Project Name & Location	Client Name	Role
Thabametsi IPP Coal-fired Power Station, near Lephalale, Limpopo	Axia	Environmental Advisor

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

Project Name & Location	Client Name	Role
Permit application for the Thabametsi Bulk Water Pipeline, near Lephalale, Limpopo	Axia	Project Manager & EAP
S53 & WULA for the Waterberg IPP Coal-Fired Power Station near Lephalale, Limpopo	Exxaro Resources	Project Manager & EAP
S53 Application for the Tshivasho Coal-fired Power Station near Lephalale, Limpopo	Cennergi	Project Manager & EAP

CONVENTIONAL POWER GENERATION PROJECTS (GAS)

Environmental Impact Assessments and Environmental Management Programmes

Project Name & Location	Client Name	Role
Ankerlig OCGT to CCGT Conversion project & 400 kV transmission power line between Ankerlig and the Omega Substation, Western Cape	Eskom Holdings SoC Limited	Project Manager & EAP
Gourikwa OCGT to CCGT Conversion project & 400kV transmission power line between Gourikwa & Proteus Substation, Western Cape	Eskom Holdings SoC Limited	Project Manager & EAP
Richards Bay Gas to Power Combined Cycle Power Station, KwaZulu-Natal	Eskom Holdings SoC Limited	Project Manager & EAP
Richards Bay Gas to Power Plant, KwaZulu-Natal	Richards Bay Gas Power 2	Project Manager & EAP
Decommissioning & Recommissioning of 3 Gas Turbine Units at Acacia Power Station & 1 Gas Turbine Unit at Port Rex Power Station to the existing	Eskom Holdings	Project Manager & EAP

Project Name & Location	Client Name	Role
Ankerlig Power Station in Atlantis Industria, Western Cape		
320MW gas-to-power station in Richards Bay, KwaZulu-Natal	Phinda Power Projects	Project Manager & EAP

Screening Studies

Project Name & Location	Client Name	Role
Fatal Flaw Analysis for 3 area identified for the establishment of a 500MW CCGT Power Station	Globeleq Advisors Limited	Project Manager & EAP
Richards Bay Gas to Power Combined Cycle Power Station, KwaZulu-Natal	Eskom Holdings SoC Limited	Project Manager & EAP

GRID INFRASTRUCTURE PROJECTS

Environmental Impact Assessments and Environmental Management Programmes

Project Name & Location	Client Name	Role
Aggeneis-Oranjemond Transmission Line & Substation Upgrade, Northern Cape	Eskom Transmission	Project Manager & EAP
Ankerlig-Omega Transmission Power Lines, Western Cape	Eskom Transmission	Project Manager & EAP
Karoshhoek Grid Integration project as part of the Karoshhoek Solar Valley Development East of Upington, Northern Cape	FG Emvelo	Project Manager & EAP
Koeberg-Omega Transmission Power Lines,, Western Cape	Eskom Transmission	Project Manager & EAP
Koeberg-Stikland Transmission Power Lines, Western Cape	Eskom Transmission	Project Manager & EAP
Kyalami Strengthening Project, Gauteng	Eskom Transmission	Project Manager & EAP
Mokopane Integration Project, Limpopo	Eskom Transmission	Project Manager & EAP
Saldanha Bay Strengthening Project, Western Cape	Eskom Transmission	Project Manager & EAP
Steelpoort Integration Project, Limpopo	Eskom Transmission	Project Manager & EAP
Transmission Lines from the Koeberg-2 Nuclear Power Station site, Western Cape	Eskom Transmission	Project Manager & EAP
Tshwane Strengthening Project, Phase 1, Gauteng	Eskom Transmission	Project Manager & EAP
Main Transmission Substation (MTS) associated with the Choje Wind Farm cluster, Eastern Cape	Wind Relic	Project Manager & EAP

Basic Assessments

Project Name & Location	Client Name	Role
Dassenberg-Koeberg Power Line Deviation from the Koeberg to the Ankerlig Power Station, Western Cape	Eskom Holdings	Project Manager & EAP
Golden Valley II WEF Power Line & Substation near Cookhouse, Eastern Cape	BioTherm Energy	Project Manager & EAP
Golden Valley WEF Power Line near Cookhouse, Eastern Cape	BioTherm Energy	Project Manager & EAP
Karoshhoek Grid Integration project as part of the Karoshhoek Solar Valley Development East of Upington, Northern Cape	FG Emvelo	Project Manager & EAP

Project Name & Location	Client Name	Role
Konkoonsies II PV SEF Power Line to the Paulputs Substation near Pofadder, Northern Cape	BioTherm Energy	Project Manager & EAP
Perdekraal West WEF Powerline to the Eskom Kappa Substation, Western Cape	BioTherm Energy	Project Manager & EAP
Rheboksfontein WEF Powerline to the Aurora Substation, Western Cape	Moyeng Energy	Project Manager & EAP
Soetwater Switching Station near Sutherland, Northern Cape	African Clean Energy Developments (ACED)	Project Manager & EAP
Solis Power I Power Line & Switchyard Station near Upington, Northern Cape	Brightsource	Project Manager & EAP
Stormwater Canal System for the Ilanga CSP near Upington, Northern Cape	Karoshhoek Solar One	Project Manager & EAP
Tsitsikamma Community WEF Powerline to the Diep River Substation, Eastern Cape	Eskom Holdings	Project Manager & EAP
Two 132kV Chickadee Lines to the new Zonnebloem Switching Station, Mpumalanga	Eskom Holdings	Project Manager & EAP
Electrical Grid Infrastructure for the Kolkies and Sadawa PV clusters, Western Cape	Mainstream Renewable Energy Developments	Project Manager & EAP
Sadawa Collector substation, Western Cape	Mainstream Renewable Energy Developments	Project Manager & EAP
Electrical Grid Infrastructure for the Vrede and Rondavel PV facilities, Free State	Mainstream Renewable Energy Developments	Project Manager & EAP

Environmental Compliance, Auditing and ECO

Project Name & Location	Client Name	Role
ECO for the construction of the Ferrum-Mookodi Transmission Line, Northern Cape and North West	Trans-Africa Projects on behalf of Eskom	Project Manager
EO for the construction of the Gamma-Kappa Section A Transmission Line, Western Cape	Trans-Africa Projects on behalf of Eskom	Project Manager
EO for the construction of the Gamma-Kappa Section B Transmission Line, Western Cape	Trans-Africa Projects on behalf of Eskom	Project Manager
EO for the construction of the Hydra IPP Integration project, Northern Cape	Trans-Africa Projects on behalf of Eskom	Project Manager
EO for the construction of the Kappa-Sterrekus Section C Transmission Line, Western Cape	Trans-Africa Projects on behalf of Eskom	Project Manager
EO for the construction of the Namaqualand Strengthening project in Port Nolloth, Western Cape	Trans-Africa Projects on behalf of Eskom	Project Manager
ECO for the construction of the Neptune Substation Soil Erosion Mitigation Project, Eastern Cape	Eskom	Project Manager
ECO for the construction of the Ilanga-Gordonia 132kV power line, Northern Cape	Karoshhoek Solar One	Project Manager

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

Project Name & Location	Client Name	Role
Environmental Permitting and WULA for the Rockdale B Substation & Loop in Power Lines,	Eskom Holdings	Project Manager & EAP
Environmental Permitting and WULA for the Steelpoort Integration project, Limpopo	Eskom Holdings	Project Manager & EAP
Environmental Permitting for Solis CSP near Upington, Northern Cape	Brightsource	Project Manager & EAP

MINING SECTOR PROJECTS

Environmental Impact Assessments and Environmental Management Programmes

Project Name & Location	Client Name	Role
Elitheni Coal Mine near Indwe, Eastern Cape	Elitheni Coal	Project Manager & EAP
Groot Letaba River Development Project Borrow Pits	Iiso	Project Manager & EAP
Grootegeluk Coal Mine for coal transportation infrastructure between the mine and Medupi Power Station (EMPr amendment) , Limpopo	Eskom Holdings	Project Manager & EAP
Waterberg Coal Mine (EMPr amendment), Limpopo	Seskoko Resources	Project Manager & EAP
Aluminium Plant WML & AEL, Gauteng	GfE-MIR Alloys & Minerals	Project Manager & EAP

Basic Assessments

Project Name & Location	Client Name	Role
Rare Earth Separation Plant in Vredendal, Western Cape	Rareco	Project Manager & EAP
Decommissioning and Demolition of Kilns 5 & 6 at the Slurry Plant, Kwa-Zulu Natal	PPC	Project Manager & EAP

Environmental Compliance, Auditing and ECO

Project Name & Location	Client Name	Role
ECO for the construction of the Duhva Mine Water Recovery Project, Mpumalanga	Eskom Holdings SoC Limited	Project Manager
External compliance audit of Palesa Coal Mine's Integrated Water Use License (IWUL), near KwaMhlanga, Mpumalanga	HCI Coal	Project Manager
External compliance audit of Palesa Coal Mine's Waste Management License (WML) and EMP, near KwaMhlanga, Mpumalanga	HCI Coal	Project Manager
External compliance audit of Mbali Coal Mine's Integrated Water Use License (IWUL), near Ogies, Mpumalanga	HCI Coal	Project Manager
Independent External Compliance Audit of Water Use License (WUL) for the Tronox Namakwa Sands (TNS) Mining Operations (Brand se Baai), Western Cape	Tronox Namakwa Sands	Project Manager
Independent External Compliance Audit of Water Use License (WUL) for the Tronox Namakwa Sands (TNS) Mineral Separation Plant (MSP), Western Cape	Tronox Namakwa Sands	Project Manager
Independent External Compliance Audit of Water Use License (WUL) for the Tronox Namakwa Sands (TNS) Smelter Operations (Saldanha), Western Cape	Tronox Namakwa Sands	Project Manager
Compliance Auditing of the Waste Management Licence for the PetroSA Landfill Site at the GTL Refinery, Western Cape	PetroSA	Project Manager

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

Project Name & Location	Client Name	Role
Waste Licence Application for the Rare Earth Separation Plant in Vredendal, Western Cape	Rareco	Project Manager & EAP

WULA for the Expansion of the Landfill site at Exxaro's Namakwa Sands Mineral Separation Plant, Western Cape	Exxaro Resources	Project Manager & EAP
S24G & WML for an Aluminium Plant, Gauteng	GfE-MIR Alloys & Minerals	Project Manager & EAP

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

Environmental Impact Assessments and Environmental Management Programmes

Project Name & Location	Client Name	Role
Bridge across the Ngotwane River, on the border of South Africa and Botswana	Eskom Holdings	Project Manager & EAP
Chemical Storage Tanks, Metallurgical Plant Upgrade & Backfill Plant upgrade at South Deep Gold Mine, near Westonia, Gauteng	Goldfields	Project Manager & EAP
Expansion of the existing Welgedacht Water Care Works, Gauteng	ERWAT	Project Manager & EAP
Golden Valley WEF Access Road near Cookhouse, Eastern Cape	BioTherm Energy	Project Manager & EAP
Great Fish River Wind Farm Access Roads and Watercourse Crossings near Cookhouse, Eastern Cape	African Clean Energy Developments (ACED)	Project Manager & EAP
Ilanga CSP Facility Watercourse Crossings near Upington, Northern Cape	Karoshhoek Solar one	Project Manager & EAP
Modification of the existing Hartebeestfontein Water Care Works, Gauteng	ERWAT	Project Manager & EAP
N10 Road Realignment for the Ilanga CSP Facility, East of Upington, Northern Cape	SANRAL	Project Manager & EAP
Nxuba (Bedford) Wind Farm Watercourse Crossings near Cookhouse, Eastern Cape	African Clean Energy Developments (ACED)	Project Manager & EAP
Pollution Control Dams at the Medupi Power Station Ash Dump & Coal Stockyard, Limpopo	Eskom	Project Manager & EAP
Qoboshane borrow pits (EMPr only), Eastern Cape	Emalahleni Local Municipality	Project Manager & EAP
Tsitsikamma Community WEF Watercourse Crossings, Eastern Cape	Cennergi	Project Manager & EAP
Clayville Central Steam Plant, Gauteng	Bellmall Energy	Project Manager & EAP
Msenge Emoyeni Wind Farm Watercourse Crossings and Roads, Eastern Cape	Windlab	Project Manager & EAP

Basic Assessments

Project Name & Location	Client Name	Role
Harmony Gold WWTW at Doornkop Mine, Gauteng	Harmony Doornkop Plant	Project Manager & EAP
Ofir-ZX Watercourse Crossing for the Solar PV Facility, near Keimoes, Northern Cape	Networx S28 Energy	Project Manager & EAP
Qoboshane bridge & access roads, Eastern Cape	Emalahleni Local Municipality	Project Manager & EAP
Relocation of the Assay Laboratory near Carletonville, Gauteng	Sibanye Gold	Project Manager & EAP
Richards Bay Harbour Staging Area, KwaZulu-Natal	Eskom Holdings	Project Manager & EAP
S-Kol Watercourse Crossing for the Solar PV Facility, East of Keimoes, Northern Cape	Networx S28 Energy	Project Manager & EAP
Sonnenberg Watercourse Crossing for the Solar PV Facility, West Keimoes, Northern Cape	Networx S28 Energy	Project Manager & EAP

Project Name & Location	Client Name	Role
Kruisvallei Hydroelectric Power Generation Scheme, Free State	Building Energy	Project Manager & EAP
Masetjaba Water Reservoir, Pump Station and Bulk Supply Pipeline near Nigel, Gauteng	Naidu Consulting Engineers	Project Manager & EAP
Access Road for the Dwarsug Wind Farm, Northern Cape Province	South Africa Mainsteam Renewable Power	Project Manager & EAP

Screening Studies

Project Name & Location	Client Name	Role
Roodepoort Open Space Optimisation Programme (OSOP) Precinct, Gauteng	TIMAC Engineering Projects	Project Manager & EAP
Vegetable Oil Plant and Associated Pipeline, Kwa-Zulu Natal	Wilmar Oils and Fats Africa	Project Manager & EAP

Environmental Compliance, Auditing and ECO

Project Name & Location	Client Name	Role
ECO and bi-monthly auditing for the construction of the Olifants River Water Resources Development Project (ORWRDP) Phase 2A: De Hoop Dam, R555 realignment and housing infrastructure	Department of Water and Sanitation	Project Manager Auditor
ECO for the Rehabilitation of the Blaaupan & Storm Water Channel, Gauteng	Airports Company of South Africa (ACSA)	Project Manager
Due Diligence reporting for the Better Fuel Pyrolysis Facility, Gauteng	Better Fuels	Project Manager
ECO for the Construction of the Water Pipeline from Kendal Power Station to Kendal Pump Station, Mpumalanga	Transnet	Project Manager
ECO for the Replacement of Low-Level Bridge, Demolition and Removal of Artificial Pong, and Reinforcement the Banks of the Crocodile River at the Construction at Walter Sisulu National Botanical Gardens, Gauteng Province	South African National Biodiversity Institute (SANBI)	Project Manager
External Compliance Audit of the Air Emission Licence (AEL) for a depot in Bloemfontein, Free State Province and in Tzaneen, Mpumalanga Province	PetroSA	Project Manager

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

Project Name & Location	Client Name	Role
WULA for the Izubulo Private Nature Reserve, Limpopo	Kjell Bismeyer, Jann Bader, Laurence Saad	Project Manager & EAP
WULA for the Masodini Private Game Lodge, Limpopo	Masodini Private Game Lodge	Environmental Advisor
WULA for the Ezulwini Private Nature Reserve, Limpopo	Ezulwini Investments	Project Manager & EAP
WULA for the Masodini Private Game Lodge, Limpopo	Masodini Private Game Lodge	Project Manager & EAP
WULA for the N10 Realignment at the Ilanga SEF, Northern Cape	Karoshhoek Solar One	Project Manager & EAP
WULA for the Kruisvallei Hydroelectric Power Generation Scheme, Free State	Building Energy	Project Manager & EAP

Project Name & Location	Client Name	Role
S24G and WULA for the illegal construction of structures within a watercourse on EFF 24 Ruimsig Agricultural Holdings, Gauteng	Sorror Language Services	Project Manager & EAP

HOUSING AND URBAN PROJECTS

Basic Assessments

Project Name & Location	Client Name	Role
Postmasburg Housing Development, Northern Cape	Transnet	Project Manager & EAP

Compliance Advice and reporting

Project Name & Location	Client Name	Role
Kampi ya Thude at the Olifants West Game Reserve, Limpopo	Nick Elliot	Environmental Advisor
External Compliance Audit of WUL for the Johannesburg Country Club, Gauteng	Johannesburg Country Club	Project Manager

Environmental Compliance, Auditing and ECO

Project Name & Location	Client Name	Role
Due Diligence Audit for the Due Diligence Audit Report, Gauteng	Delta BEC (on behalf of Johannesburg Development Agency (JDA))	Project Manager

ENVIRONMENTAL MANAGEMENT TOOLS

Project Name & Location	Client Name	Role
Development of the 3rd Edition Environmental Implementation Plan (EIP)	Gauteng Department of Agriculture and Rural Development (GDARD)	Project Manager & EAP
Development of Provincial Guidelines on 4x4 routes, Western Cape	Western Cape Department of Environmental Affairs and Development Planning	EAP
Compilation of Construction and Operation EMP for the Braamhoek Transmission Integration Project, Kwazulu-Natal	Eskom Holdings	Project Manager & EAP
Compilation of EMP for the Wholesale Trade of Petroleum Products, Gauteng	Munaca Technologies	Project Manager & EAP
Operational Environmental Management Programme (OEMP) for Medupi Power Station, Limpopo	Eskom Holdings	Project Manager & EAP
Operational Environmental Management Programme (OEMP) for the Dube TradePort Site Wide Precinct	Dube TradePort Corporation	Project Manager & EAP
Operational Environmental Management Programme (OEMP) for the Kusile Power Station, Mpumalanga	Eskom Holdings	Project Manager & EAP
Review of Basic Assessment Process for the Wittekleibosch Wind Monitoring Mast, Eastern Cape	Exxaro Resources	Project Manager & EAP
Revision of the EMP for the Sirius Solar PV	Aurora Power Solutions	Project Manager & EAP

Project Name & Location	Client Name	Role
State of the Environment (SoE) for Emalahleni Local Municipality, Mpumalanga	Simo Consulting on behalf of Emalahleni Local Municipality	Project Manager & EAP
Aspects and Impacts Register for Salberg Concrete Products operations	Salberg Concrete Products	EAP
First State of Waste Report for South Africa	Golder on behalf of the Department of Environmental Affairs	Project Manager & EAP
Responsibilities Matrix and Gap Analysis for the Kruisvallei Hydroelectric Power Generation Scheme, Free State Province	Building Energy	Project Manager
Responsibilities Matrix and Gap Analysis for the Roggeveld Wind Farm, Northern & Western Cape Provinces	Building Energy	Project Manager

PROJECTS OUTSIDE OF SOUTH AFRICA

Project Name & Location	Client Name	Role
Advisory Services for the Zizabona Transmission Project, Zambia, Zimbabwe, Botswana & Namibia	PHD Capital	Advisor
EIA for the Semonkong WEF, Lesotho	MOSCET	Project Manager & EAP
EMP for the Kuvaninga Energia Gas Fired Power Project, Mozambique	ADC (Pty) Ltd	Project Manager & EAP
Environmental Screening Report for the SEF near Thabana Morena, Lesotho	Building Energy	EAP
EPBs for the Kawambwa, Mansa, Mwense and Nchelenge SEFs in Luapula Province, Zambia	Building Energy	Project Manager & EAP
ESG Due Diligence for the Hilton Garden Inn Development in Windhoek, Namibia	Vatange Capital	Project Manager
Mandahill Mall Rooftop PV SEF EPB, Lusaka, Zambia	Building Energy	Project Manager & EAP
Monthly ECO for the PV Power Plant for the Mocuba Power Station	Scatec	Project Manager

CURRICULUM VITAE OF LEHLOGONOLO MASHEGO

Profession: Public Participation and Environmental Consultant
Specialisation: Environmental Assessment Practitioner
Work Experience: Four (4) years and ten (10) months

VOCATIONAL EXPERIENCE

Professional experience lies mainly in the environmental consulting field specialising in environmental impact assessments, public participation processes and facilitation, environmental planning, environmental research, environmental training, rehabilitation, . Having served the mining, construction and infrastructure industries.

SKILLS BASE AND CORE COMPETENCIES

- Project management,
 - Microsoft Office,
 - Interpersonal and communication skills,
 - Presenting,
 - Report writing and formatting,
 - Environmental legislative interpretation,
 - Planning and organising, • Leading, coaching and mentoring,
 - Research,
 - Networking and marketing,
 - Data analysis, interpretation and management, and
- Quality management systems and document control.

EDUCATION AND PROFESSIONAL STATUS

Degrees:

- Masters in Environmental Science, University of Witwatersrand, 2021
- BSocSci Hons in Geographical and Environmental Science, University of Pretoria, 2016
- BA Geography, University of Johannesburg, 2015

Short Courses:

- Rethinking Integrated Environmental Management in Pursuit of the Sustainable Development Goals, IAIAsa National Conference, 2021
- Proposed Amendments to the Financial Provisioning Regulations 2015, IAIAsa, 2021
- Towards Sustainable and Responsible Mine Closure, IAIAsa, 2021
- Comprehensive Safety File Compilation Training Course, MAB Consultancy, 2019
- Monitor the Application of Health, Safety and Environmental Protection Procedures OHS Act 85 of 1993, Shesha Management Services, 2019
- Project Management, Africa International Advisors, 2017

Professional Society Affiliations:

- International Association of Impact Assessment – South Africa (IAIAsa); 5579

Other Relevant Skills:

- XXX

EMPLOYMENT

Date	Company	Roles and Responsibilities
Jan 2022 - Current:	Savannah Environmental (Pty) Ltd	Public Participation and Environmental Consultant <u>Tasks include:</u> <ul style="list-style-type: none"> • Public participation • Technical writing • Research
Apr 2019 – Current	International Association of Impact Assessment – South Africa	Branch Committee Member – Students and Young Professionals <u>Tasks include:</u> <ul style="list-style-type: none"> • Marketing • Strategic development • Events management • Stakeholder engagement • Student empowerment • Risk Assessment
Jan 2020 – Dec 2021	GCS Water and Environmental Consultants	Environmental Liaison Officer <u>Tasks included:</u> <ul style="list-style-type: none"> • Public participation and facilitation • Authority and client liaison • Report writing • Environmental authorisation applications • Marketing • Tendering and proposal compilation • Project administration • Project management

Date	Company	Roles and Responsibilities
		<ul style="list-style-type: none"> • Application of environmental management systems • Maintenance of ISO systems • Environmental control officer, auditing and compliance monitoring • Internal and external training • Health and safety, risk identification and risk management • Project management • Project organisation and planning • Human Resources Management and marketing • Mentoring and coaching • Team continual development representative with the duty of assigning fundamental tasks for continuous growth and development
April 2018 – Dec 2019	Myezo Environmental Management Services	<p>Junior Environmental Consultant</p> <p><u>Tasks included:</u></p> <ul style="list-style-type: none"> • Project assistance • Project administration • Project support • Report writing • Research • Document control • Quality management system management
April 2017 – Mar 2018	Myezo Environmental Management Services	<p>Environmental Intern and Project Assistant</p> <p><u>Tasks included:</u></p> <ul style="list-style-type: none"> • Project assistance • Project administration • Project support • Report writing • Research • Document control • Quality management system management
2016	University of Pretoria – Department of Geography and Environmental Sciences	<p>Student mentor</p> <p><u>Tasks included:</u></p> <ul style="list-style-type: none"> • Academic mentoring and coaching • Academic support and guidance • Academic recommendations • Research assistance • Personal guidance
Oct 2013 – Sep 2014	University of Johannesburg – Annirand Dayhouse	<p>Hawker/Leader</p> <p><u>Tasks included:</u></p> <ul style="list-style-type: none"> • Head of Communication • Secretary • Head of Community Service • Mentoring and academic guidance • Overseeing all administration tasks

Date	Company	Roles and Responsibilities
		<ul style="list-style-type: none"> In-charge of social media platforms

PROJECT EXPERIENCE

Project experience primarily lies in the mining industry having worked extensively in Mpumalanga, North West and Gauteng Province with an averaged four (4) and a half work experience acquired. Construction and housing development projects in and around the Gauteng Province with an averaged three (3) years work experience acquired.

RENEWABLE POWER GENERATION PROJECTS: SOLAR ENERGY FACILITIES

Environmental Impact Assessments and Environmental Management Programmes

Project Name & Location	Client Name	Role
Lephalale Solar Project – Limpopo Province	Grootgeluk Mine – Exxaro Coal	Public Participation Lead

CONVENTIONAL POWER GENERATION PROJECTS (COAL)

Environmental Impact Assessments and Environmental Management Programmes

Project Name & Location	Client Name	Role
EMPr Amendment Application for Voorspoed Coal Mine, Free State	De Beers Consolidated Mines	Public Participation Lead

GRID INFRASTRUCTURE PROJECTS

Environmental Impact Assessments and Environmental Management Programmes

Project Name & Location	Client Name	Role
Proposed Donatello Substation, Gauteng Province	MDT Environmental	Junior PPP

MINING SECTOR PROJECTS

Screening Studies

Project Name & Location	Client Name	Role
Feasibility Study of Pitlakes as a Mine Closure Option.	Coaltech Research Association	Public participation lead

Environmental Compliance, Auditing and ECO

Project Name & Location	Client Name	Role
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Annual Environment Performance Assessment for Tharisa Mine, North West Province	Tharisa Minerals	ECO
Monthly Audit for Arbor Railway Siding, Mpumalanga Province	Gijima Supply Chain Management	ECO
Monthly Audit for Forfar Railway Siding	Aplorox (Pty) Ltd	ECO
Annual EMPr and IWUL Audit for Hawerklip Railway Siding	Brazen Alger	ECO

Due Diligence Reporting

Project Name & Location	Client Name	Role
Annual Rehabilitation Strategy and Implementation Programme (RSIP) for Mafube Mine, Mpumalanga Province	Exxaro Coal, Mpumalanga	Junior EAP and report writer
Annual Rehabilitation Strategy and Implementation Programme (RSIP) for Belfast Mine, Mpumalanga Province	Exxaro Coal, Mpumalanga	Junior EAP and report writer
Annual Rehabilitation Strategy and Implementation Programme (RSIP) for Rietkuil Siding, Mpumalanga Province	Exxaro Coal, Mpumalanga	Junior EAP and report writer
Annual Rehabilitation Strategy and Implementation Programme (RSIP) for Tharisa Mine, North West Province	Tharisa Minerals	Junior EAP and report writer

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

Environmental Impact Assessments and Environmental Management Programmes

Project Name & Location	Client Name	Role
Basic Assessment Report for the proposed development of the K11 Road, Gauteng Province	Vuka-Afrika Consulting Engineers and Project Managers	Junior EAP
Decommissioning of a Transnet pipeline running from Durban to Johannesburg	Hydro Science	Junior EAP

Environmental Compliance, Auditing and ECO

Project Name & Location	Client Name	Role
12 th Avenue Bridge Rehabilitation, Gauteng Province	E-Square Engineering	ECO
Oxford Road Road Rehabilitation, Gauteng Province	E-Square Engineering	ECO
Chaplin Stormwater Infrastructure Rehabilitation, Gauteng Province	E-Square Engineering	ECO

HOUSING AND URBAN PROJECTS

Environmental Impact Assessments and Environmental Management Programmes

Project Name & Location	Client Name	Role
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<i>Gauteng Rapid Land Release Programme, Unitas Park and Evaton West, Gauteng Province</i>	<i>Department of Human Settlements</i>	<i>Junior EAP</i>
<i>Matsulu Waste Transfer Station, Mpumalanga Province</i>	<i>Zethu Consulting Services</i>	<i>Junior EAP</i>



APPENDIX B

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. This plan should be updated through the project development process to ensure relevance at all project stages.

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 the 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 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 organisation 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 mechanism aims to avoid such interactions by addressing the grievances within a short timeframe, and to mutual satisfaction, where possible.

APPENDIX C

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 Red Sands PV1 and its associated infrastructure. 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 solar PV facility, 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.

Notably, no IAP species were recorded within the Red Sands PV1 development area. However, invasive species tend to encroach into disturbed areas and should be considered a possible risk.

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. 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 would not 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 record 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 the construction phase to detect and quantify any alien species that may become established.
- » Alien vegetation regrowth on areas disturbed by construction activities 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 and 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, rehabilitation efforts and 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 and 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 and 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

APPENDIX D

PLANT RESCUE AND PROTECTION PLAN

1. PURPOSE

The purpose of the Red Sands PV1 Plant Rescue and Protection Plan is to implement avoidance and mitigation measures, in addition to the mitigations included in the EMPr to reduce the impact of the development of the solar facility and associated infrastructure 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 Northern Cape Conservation Act (2009) and trees protected under the National List of Protected Tree Species. This is followed by an identification of protected species present within the Red Sands PV1 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 under the National List of Protected Trees, which is updated on a regular basis. Any clearing of nationally protected trees requires a permit from DAFF. 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 Northern Cape Nature Conservation Act (No. 9 of 2009) are protected and require provincial permits. The Northern Cape Conservation Act lists a variety of species as protected but also several whole families and genera as protected. Of particular relevance to the current study are the following, which are extracted from the legislation and are not intended to provide a comprehensive list of all protected species, only those which are likely to be encountered in the area. The reader is referred to the schedules of the Act for a full list of species listed under the act.

1.

3. IDENTIFICATION OF LISTED SPECIES

In this section, the listed species observed to occur within the surrounding area are identified and listed below. Those present and the number affected within the development footprint would be clarified following the pre-construction walk-through. The list is not considered exhaustive and additional species may be observed to be present during the pre-construction walk-through, which should be conducted at a favourable time of year, such that there is a maximal chance of picking up geophytes and other species which may not be easily observed at other times of the year.

It is expected that 576 species of indigenous plants occur within the area surrounding the project site. Seven (7) species of conservation concern (SCC) based on their conservation status could be expected to occur within the development area, as detailed in **Table 1** below. Three of these expected species are endemic

to South Africa. The likelihood of occurrence was determined by considering the species habitat requirements and examining records on the Global Biodiversity Information Facility (GBIF) database.

Table 1: Threatened flora species that may occur within the proposed Red Sands PV1 development area

Family	Species Name	Conservation Status	Endemism	Habitat	Likelihood of Occurrence
Acanthaceae	<i>Acanthopsis hoffmannseggiana</i>	DD		Sandy plains, stony hillsides and ridges, usually associated with weathered quartzite and granite, but also occurs on mudstone (in Prince Albert area) and limestone (Asbestos Mountains), usually at an elevation between 650 and 1000 m.	High
Aizoaceae	<i>Dinteranthus wilmotianus</i>	NT	Endemic	Quartz slopes and alluvial gravel soils. EOO < 10 000 km ² , suspected to occur at 10-20 locations.	Low
Asphodelaceae	<i>Aloidendron dichotomum</i>	VU	Near-Endemic	On north-facing rocky slopes (particularly dolomite) in the south of its range. Any slopes and sandy flats in the central and northern parts of range.	Low
Asteraceae	<i>Eriocephalus macroglossus</i>	NT	Endemic	Rocky lower slopes in Richtersveld and northern Namaqualand, from Kubus to Springbok.	Low
Asteraceae	<i>Senecio monticola</i>	DD		Literature is lacking. Data Deficient - Taxonomically Problematic.	Low
Asteraceae	<i>Senecio trachylaenus</i>	DD	Endemic	Literature is lacking. Data Deficient - Taxonomically Problematic.	Low
Poaceae	<i>Brachiaria dura</i> var. <i>pilosa</i>	DD		Savanna woodland and grassland on sandy soils.	Low

A total of 29 woody and herbaceous plant species, representing 17 families, were recorded within the development area during the field survey. Only one of these species is endemic to South Africa. Three of the recorded flora species are protected under national and provincial legislation and therefore, the necessary permits are required from the relevant authority for their removal and relocation where possible. It is important to note that these were not all the specimens that were recorded but were those that were recorded during the meandering and covered an area of 84.69 ha. Using the number of individuals recorded and the area traversed the density of the protected flora can be summarised as follows:

- » *Boscia albitrunca* – 4 individuals in 84.69 ha = 0.047 ind.ha⁻¹;
- » *Ledebouria apertiflora* – 7 individuals in 84.69 ha = 0.083 ind.ha⁻¹; and
- » *Vachellia haematoxylon* – 96 individuals in 84.69 ha = 1.13 ind.ha⁻¹.

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 Northern Cape Nature Conservation permits which must be obtained before construction can commence.

Where listed plant 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 Northern Cape Department of Agriculture, Environmental Affairs, Rural Development and Land Reform and Nature Conservation 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-DENC 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-DENC and/or 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.

APPENDIX E

REVEGETATION AND REHABILITATION PLAN

1. PURPOSE

The purpose of the Revegetation and Rehabilitation Plan is to ensure that areas cleared or impacted during construction activities within the development footprint for Red Sands PV1, 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 Revegetation and Rehabilitation Plan should be read in conjunction with other site-specific plans, including the Erosion Management Plan, Alien Invasive Management Plan and Plant Rescue and Protection Plan. Prior to the commencement of construction, a detailed Revegetation and Rehabilitation Plan and Method Statement for the site must be compiled with the aid of a suitably qualified, professionally registered specialist (with a botanical or equivalent qualification).

2. RELEVANT ASPECTS OF THE BROADER STUDY AREA AND DEVELOPMENT AREA

The habitat structure within the Red Sands PV1 Facility development area was homogeneous, with no distinctive variability, and therefore, a single habitat type was delineated. This was termed Plains Thornveld. Photographs illustrating the general structure of the habitat is provided in Figure 1. The overall habitat condition can be regarded as degraded due to the dense stands of *Rhigozum trichotomum* and *Senegalia mellifera* subsp. *detinens* in certain areas.



Figure 1: Overview of the habitat condition present within the proposed Red Sands PV1 Facility

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 preserved 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 revegetated 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 the specialist.
- » Ensure that steep slopes are not cleared 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 commences.

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.

APPENDIX F

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 STUDY AREA AND DEVELOPMENT AREA

The study area consists of extensive to irregular plains on a slightly sloping plateau sparsely vegetated with an average slope of between 0% and 3%. The development area of the project is situated between elevations 800m and 1180m above sea level, with an average elevation of 990m. The terrain surrounding the farm is predominantly flat with an even slope towards the Orange River valley that forms the most distinct hydrological feature in the region.

The Upington area is generally associated with a desert climate, with very little annual rainfall of 180mm and annual average temperatures of 19.3°C.

During construction, there will be a lot of disturbed and loose soil at the site which will render the area vulnerable to erosion. Erosion is one of the greater risk factors associated with the development and it is therefore critically important that proper erosion control structures are built and maintained over the lifespan of the project.

Soil compaction and increased erosion risk would occur due to the loss of plant cover and soil disturbance created during the construction phase. This may potentially impact the downstream watercourses, wetlands and aquatic habitats, mainly due to an increase of surface water and silt inflow from the surrounding disturbed areas. These potential impacts may result in a reduction in the buffering capacities of the landscape during extreme weather events.

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 cleared 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 channelled 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 G** 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 in 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 must be designed and implemented if not already addressed by the mitigations implemented as part of construction, with a view to prevent the passage of concentrated flows off hardened surfaces and onto natural areas.

REFERENCES

- Coetzee, K. (2005). *Caring for Natural Rangelands*. Scottsville: University of KwaZulu-Natal Press.
- Commission, F. R. (2009, March 10). *Forestry Commission*. Retrieved August Tuesday, 2012, from Forestry Commission: Forest Research : www.forestry.gov.uk
- Department of Environmental Affairs. (1983). *Conservation of Agricultural Resources Act 43 of 1983*. Pretoria: Department of Environmental Affairs.
- Koch, F.G.L., Kotze, A.V. & Ellis, F., (1987). *Land types of the maps 2816 Alexander Bay, 2818 Warmbad, 2916 Springbok, 2918 Pofadder, 3017 Garies and 3018 Loeriesfontein*. Climate. Mem. Nat. Agric. Res. S. Afr. No. 9. ARC-Institute for Soil, Climate and water, Pretoria.
- Tongway, D. J., & Ludwig, J. A. (2004). *Heterogeneity in arid and semi arid lands*. Queensland: Sustainable Ecosystems.
- van der Linde, M., & Feris, L. (2010). *Compendium of South African Legislation*. Pretoria: Pretoria University Press.

APPENDIX G

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 footprint 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 development footprint, 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 solar PV and the grid connection infrastructure 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. 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 within the development footprint.
- » 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 development footprint 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 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.

APPENDIX H

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 phases. 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 Red Sands PV1 will generate construction solid waste, as well as general waste and hazardous waste during the lifetime of the solar PV 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, batteries situated in specially adapted shipping 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.

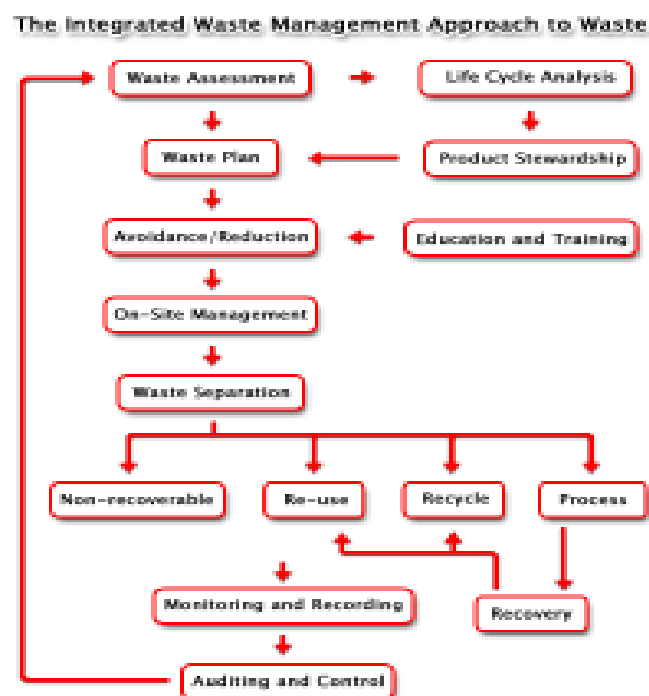


Figure 1: Integrated Waste Management Flow Diagram

(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 appropriately 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.

APPENDIX I

PRINCIPLES FOR TRAFFIC AND TRANSPORTATION MANAGEMENT

1. PURPOSE

The purpose of this Traffic and Transportation Management Plan (TTMP) is to address regulatory compliance, traffic management practices, and protection measures to help reduce impacts related to transportation of project components and the construction of temporary and long-term access within the vicinity of the Red Sands PV1 development area. 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 development area.
- » 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.

Prior to the commencement of construction, a detailed TTMP and Method Statement for the site should be compiled.

2. RELEVANT ASPECTS OF THE PROJECT

Access to the study area is considered as an important characteristic as appropriate access is required for the transportation of project related infrastructure and heavy machinery during construction. The proximity of the study area to viable access routes decreases the traffic impact on secondary roads during the construction and operation phases of the project. The project site can be readily accessed via the N8, and the existing unnamed gravel main road located along the southern boarder of the project site.

A network of internal access roads with a width of up to 6m will be constructed to provide access to the PV panel and built-up areas within the development footprint for the project life cycle of Red Sands PV1.

3. TRAFFIC AND TRANSPORTATION MANAGEMENT PRINCIPLES

The following principles apply in terms of transportation and traffic management:

- » 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 programme (e.g. toolbox talks) by the Environmental Officer (EO). Through this programme, 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.

4. 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.

APPENDIX J

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

AGV Projects (Pty) Ltd is proposing the development of a solar PV facility and associated infrastructure on a site located approximately 26km northeast of Groblershoop, within the Tsantsabane Local Municipality and the ZF Mgcawu District Municipality in the Northern Cape Province. The project is to be known as Red Sands PV1 and will have a contracted capacity of up to 75MW. The project will comprise the following key infrastructure and components:

- » Solar PV array comprising PV modules and mounting structures.
- » Inverters and transformers.
- » Low voltage cabling between the PV modules to the inverters

- » Fence around the project development area
- » Camera surveillance
- » Internet connection
- » 33kV cabling between the project components and the facility substation
- » 33/132kV onsite facility substation¹.
- » Battery Energy Storage System (BESS).
- » Site offices and maintenance buildings, including workshop areas for maintenance and storage.
- » Laydown areas.
- » Access roads (up to 6m) and internal distribution roads (up to 4m).

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

¹ A 132kV powerline will be assessed through a separate Basic Assessment Process

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 study area. 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)

iii. 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.

i. 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

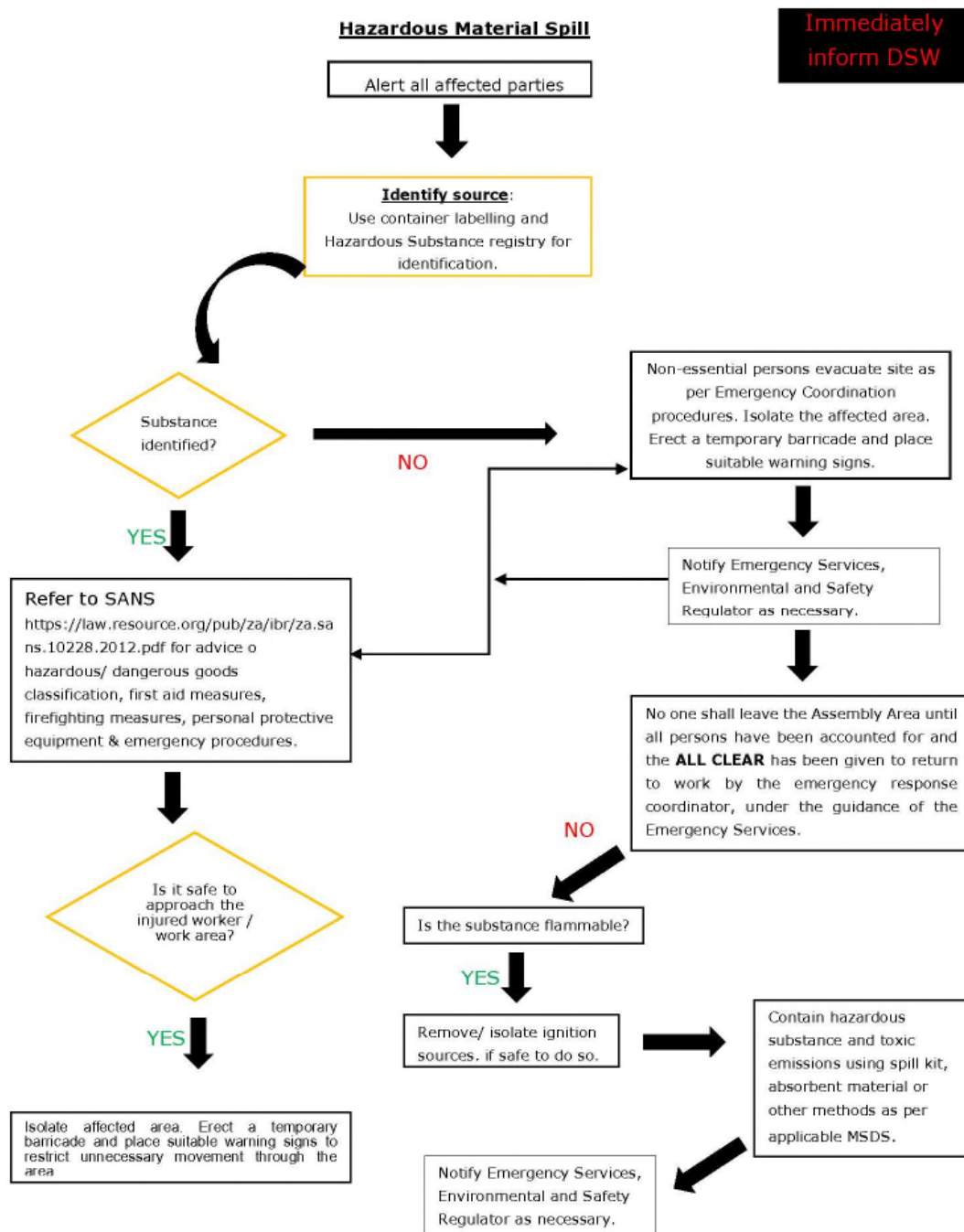


Figure 1: Hazardous Material Spill

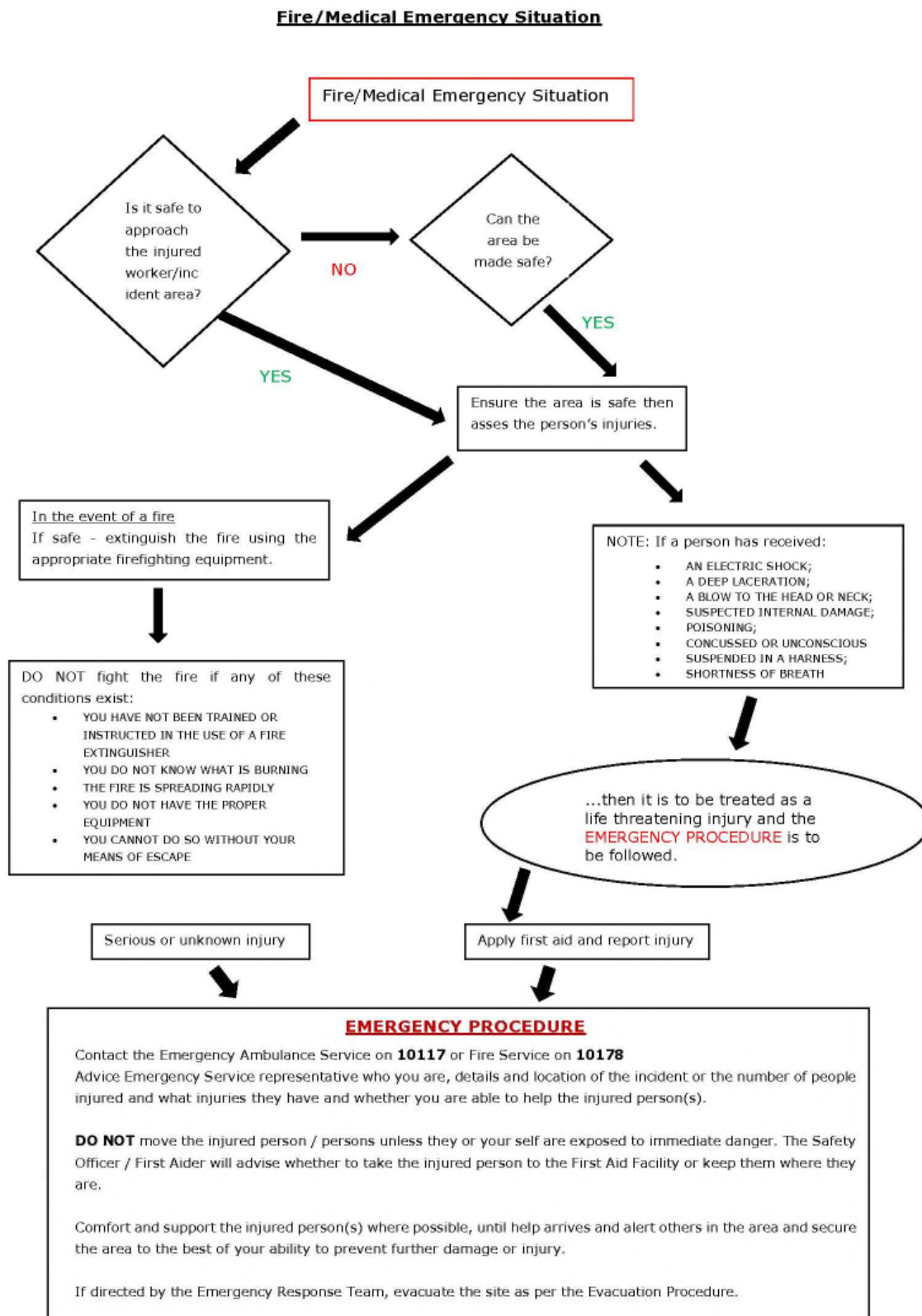


Figure 2: Emergency Fire/Medical

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.

APPENDIX K

APPENDIX L

CHANCE FIND PROTOCOL

1. PURPOSE

Monitoring Programme for Palaeontology – to commence once the excavations for all structures and infrastructure begin.

1. The following procedure is only required if fossils are seen on the surface and when excavations commence.
2. When excavations begin the rocks and 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.
3. Photographs of similar fossils must be provided to the developer to assist in recognizing the fossil plants and bones in the pans or channels This information will be built into the EMP's training and awareness plan and procedures.
4. Photographs of the putative fossils can be sent to the palaeontologist for a preliminary assessment.
5. If there is any possible fossil material found by the developer/environmental officer then the qualified palaeontologist sub-contracted for this project, should visit the site to inspect the selected material and check the excavations where feasible.
6. 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.
7. If no good fossil material is recovered, then any site inspections by the palaeontologist will not be necessary.
8. If no fossils are found and the excavations have finished, then no further monitoring is required.

APPENDIX M

