
DAISY SOLAR PV FACILITY AND ASSOCIATED INFRASTRUCTURE, NORTHERN CAPE PROVINCE

ENVIRONMENTAL MANAGEMENT PROGRAMME

May 2023

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EMPR DETAILS

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DEFINITIONS AND TERMINOLOGY

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: Impacts that result from the incremental impact of the proposed activity on a common resource when added to the impacts of other past, present or reasonably foreseeable future activities (e.g. discharges of nutrients and heated water to a river that combine to cause algal bloom and subsequent loss of dissolved oxygen that is greater than the additive impacts of each pollutant). Cumulative impacts can occur from the collective impacts of individual minor actions over a period and can include both direct and indirect impacts.

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.

Development area: The development area is that identified area (located within the project site) which has been assessed by specialists within the EIA Report with the aim of identifying areas of sensitivity which should be avoided by the development footprint or facility layout. The development area is ~360ha in extent.

Development footprint: The development footprint is the defined area (located within the development area) where the Solar PV Energy Facility and other associated infrastructure for the Project is planned to be constructed. This is the actual footprint of the facility, and the area which would be disturbed. The development footprint is ~360ha in extent.

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.

'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/occur 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 are 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 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 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: A plan that organises and co-ordinates mitigation, rehabilitation and monitoring measures in order to guide the implementation of a proposal and its on-going maintenance after implementation.

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.

Incident: Section 30 of NEMA defines an 'incident' as "an unexpected sudden occurrence, including a major emission, fire or explosion leading to serious danger to the public or potentially serious pollution of or detriment to the environment, whether immediate or delayed."¹

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

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.

Mitigation hierarchy: The mitigation hierarchy is a framework for managing risks and potential impacts related to biodiversity and ecosystem services. The mitigation hierarchy is used when planning and implementing development projects, to provide a logical and effective approach to protecting and conserving biodiversity and maintaining important ecosystem services. It is a tool to aid in the sustainable management of living, natural resources, which provides a mechanism for making explicit decisions that balance conservation needs with development priorities.

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.

Project developer: The project developer Energy Team (Pty) Ltd will be the party responsible for the construction and day-to-day operation and maintenance of the proposed Solar PV Facility.

Project site: The project site is the aerial extent of the affected properties (~652ha) within which the Daisy Solar PV Facility is proposed.

Proponent: Applicant/Project Developer, Energy Team (Pty) Ltd will be the party responsible for the construction and day-to-day operation and maintenance of the proposed Solar PV Facility.

¹<http://ipwis.pgwc.gov.za/ipwisdoc/Public/Publications/ChemicalsMgt/A%20Procedure%20for%20Section%2030%20of%20NEMA.pdf>

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

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

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

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.

ABBREVIATIONS AND ACRONYMS

DFFE	National Department of Forestry, Fisheries and the Environment
DWS	Department of Water and Sanitation
EAP	Environmental Assessment Practitioner
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme
EO	Environmental Officer
EPC	Engineering Procurement Contractor
GG	Government Gazette
GN	Government Notice
Ha	Hectare
HGM	Hydrogeomorphic
I&AP	Interested and Affected Party
km ²	Square kilometres
kV	Kilovolt
m ²	Square meters
m/s	Meters per second
MS	Method Statement
MW	Mega Watt
NEMA	National Environmental Management Act (Act No 107 of 1998)
NHRA	National Heritage Resources Act (Act No 25 of 1999)
NIRP	National Integrated Resource Planning
NWA	National Water Act (Act No 36 of 1998)
NWC	Not Conservation Worthy
PM	Project Manager
PV	Photovoltaic
SHE	Safety, Health and Environment
SAHRA	South African Heritage Resources Agency
SANRAL	South African National Roads Agency Limited

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CHAPTER 1: INTRODUCTION

This Environmental Management Programme (EMPr) has been compiled for the Daisy Solar PV Facility. The Project Site is located on a site approximately ~20km West of the town of Komaggas and ~24km Southeast of Daisy within the jurisdiction of the Nama Khoi Local Municipality and the Namaqua District Municipality in the Northern Cape Province. The Daisy Solar PV Facility will have a contracted capacity of up to 360MW and is to be constructed over an area of approximately 652 ha in extent.

This EMPr has been developed on the basis of the findings of the Environmental Impact Assessment (EIA) and must be implemented to protect sensitive on-site and off-site features through controlling construction, operation and decommissioning activities that could have a detrimental effect on the environment, and through avoiding or minimising potential impacts. This EMPr is applicable to all Energy Team (Pty) Ltd employees and contractors working on the pre-construction, construction, and operation and maintenance phases of the Daisy Solar PV Facility. The document must be adhered to and updated as relevant throughout the project life cycle. This document fulfils the requirement of the EIA Regulations, 2014 (as amended) and forms part of the EIA report of the Project.

In terms of the Duty of Care provision in S28(1) of the 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 the Project is avoided, halted or minimised. In terms of NEMA, it has become the legal duty of a Project Developer to consider a project holistically, and to consider the cumulative effect of a variety of impacts.

CHAPTER 2: PROJECT DETAILS

The preferred project site for the Daisy Solar PV Facility and associated grid connection infrastructure is located within Ward 8 in the Nama Khoi Local Municipality within the Namakwa District Municipality, Northern Cape. A project site consisting of one affected property (**Figure 2.1**), has been identified as the preferred area for the development of the solar PV facility and the associated infrastructure:

PV Facility: Farm Zonnekwa 326

Grid line corridor: Farm Zonnekwa 326

It is within the project site that the development area for Daisy Solar PV Facility and associated Grid Connection Infrastructure has been identified and located. The Daisy Solar PV Facility development area² is ~652ha in extent and is assessed in its entirety within this BA Report. The development footprint³ is 589ha in extent. The entire extent of the project site is located within the Springbok Renewable Energy Development Zone (REDZ) and within the Northern Corridor of the Strategic Transmission Corridors. Access to the project site is possible existing roads. The project site and development area can be accessed via the secondary DR2964 road, which runs north of the development area.

A main access road up to ~4km in length and up to 8m in width will provide access to the facility, and ultimately to both planned solar PV sites (that is, a shared access route). The access to the facility/ies will be via an existing (unnamed) gravel road off the DR2964 between Komaggas and Kleinsee. This gravel road is well established, however it's likely portions of this road will require upgrading to accommodate the movement of heavy vehicles. This existing road traverses only Farm Zonnekwa 326. From this point, a planned access road up to ~3km in length and up to 8m in width located within the 300m grid connection corridor will traverse Farm Zonnekwa 326.

The grid connection for the facility will consist of underground cabling within the facility, an on-site facility substation and switching substation to be connected to the authorised Zonnequa Substation (located on Farm Zonnekwa 326) via overhead power line (located ~1.6km west of the site). The grid connection infrastructure is to be located within an assessment corridor of 300m wide.

² The development area is that identified area where the 360MW PV facility is planned to be located. This area has been selected as a practicable option for the facility, considering technical preference and constraints. The development area is ~652ha in extent.

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

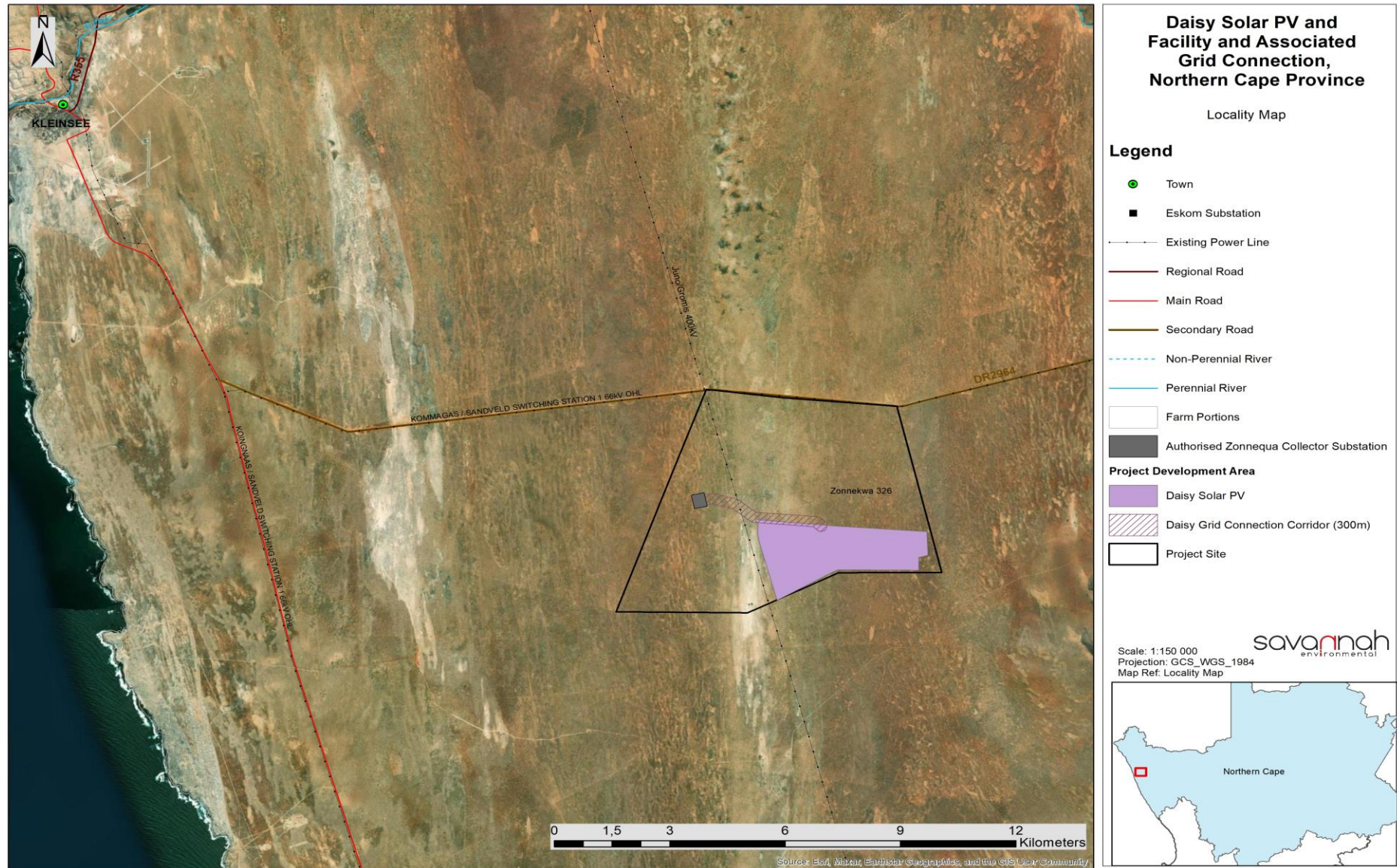


Figure 2.1: Locality map of the Development Area within which the Daisy Solar PV Facility is proposed to be developed.

2.1. Components of the Daisy Solar PV Facility

The Development Footprint is proposed to accommodate the PV panels and all associated infrastructure which is required for such a facility, and will include:

- » Solar PV array comprising PV modules and mounting structures
- » Inverters and transformers
- » Low voltage cabling between the PV modules to the inverters
- » 33kV cabling between the project components and the facility substation
- » 132kV onsite facility substation
- » 132kV power line to connect to the grid at Zonnequa Collector Substation within a 300m wide and 3.5km long corridor
- » Battery Energy Storage System (BESS)
- » Site offices and maintenance buildings, including workshop areas for maintenance and storage
- » Laydown areas
- » Site access and internal roads.

2.2. Life-cycle Phases of Daisy Solar PV Facility

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

2.2.1 Design and Pre-Construction Phase

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

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

2.2.2 Construction Phase

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

Procurement and employment

At the peak of construction, the project is likely to create a maximum of 50 employment opportunities. These employment opportunities will be temporary and will last for a period of approximately 6 to 8 months. Employment opportunities generated during the construction phase will include low skilled, semi-skilled, and skilled opportunities. Solar PV projects make use of high levels of unskilled and semi-skilled labour so there will be good opportunity to use local labour, where available. Employment opportunities will peak during the construction phase and significantly decline during the operation phase.

Undertake Site Preparation

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

Transport of Components and Equipment to Site

The national, regional, secondary and proposed internal access roads will be used to transport all components and equipment required during the construction phase. Typical civil engineering construction equipment will need to be brought to the project site (e.g., excavators, trucks, graders, compaction equipment, cement trucks, etc.) as well as components required for the mounting of the PV support structures, construction of the on-site facility substation and site preparation.

Establishment of Laydown Areas on Site

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

Erect PV Panels and Construct Substation and Invertors

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

systems. Underground cables and overhead circuits will connect the Power Conversion Stations (PCS) to the on-site AC electrical infrastructure, and ultimately the facility substation.

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

Establishment of Ancillary Infrastructure

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

Undertake Site Rehabilitation

Once construction is completed and all construction equipment has been removed, the project site will be rehabilitated where practical and reasonable. In addition, on full commissioning of the Daisy Solar PV facility, any access points which are not required during operation must be closed and rehabilitated accordingly.

2.2.3 Operation Phase

The Daisy Solar PV facility is expected to operate for a minimum of 20 years. The facility will operate continuously, 7 days a week, and will include battery storage. While the solar facility will be largely self-sufficient, monitoring and periodic maintenance activities will be required. Key elements of the Operation and Maintenance (O&M) plan include monitoring and reporting the performance of the solar energy facility, conducting preventative and corrective maintenance, receiving visitors, and maintaining security.

The operation phase will create approximately 8 full-time equivalent employment positions which will include low-skilled, semi-skilled and skilled personnel. Employees that can be sourced from the local municipal area include the less skilled and semi-skilled personnel (such as safety and security staff and certain maintenance crew). Highly skilled personnel may need to be recruited from outside the local area where these resources are not available within the area.

2.2.4 Decommissioning Phase

Depending on the continued economic viability of Daisy Solar PV facility, following the initial 20-year operation lifespan, the solar energy facility will either be decommissioned, or the operation phase will be extended. If it is deemed financially viable to extend the operation phase, existing components would either continue to operate or be disassembled and replaced with new, more efficient technology/ infrastructure available at the time. If the decision is made to decommission the facility, the following decommissioning activities will take place:

Site Preparation

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

Disassembly and removal of existing components

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

Future plans for the site and infrastructure after decommissioning

The generation capacity of the facility would have degraded by approximately 15% over the 20-year operational lifespan. The solar energy facility will potentially have the opportunity to generate power for a Merchant Market operation (i.e., the client would sell power on a bid basis to the market). Another option for the site after decommissioning is for agricultural activities to resume.

2.3. Findings of the BA Report

The EIA Report, together with the specialist studies provide a detailed assessment of the potential impacts that may result from the development of the Daisy Solar PV Facility. No environmental fatal flaws or unacceptable impacts were identified in the detailed specialist studies conducted, provided that the recommended mitigation measures are implemented. These measures include, amongst others, the avoidance of sensitive features within the development area as specified by the specialists.

The potential environmental impacts associated with the Project assessed through the EIA process include:

- » Impacts on terrestrial ecology (flora and fauna).
- » Impacts on avifauna.
- » Impacts on soils and agricultural potential.
- » Impacts on heritage including archaeology and palaeontology
- » Visual impacts.
- » Positive and negative social impacts.

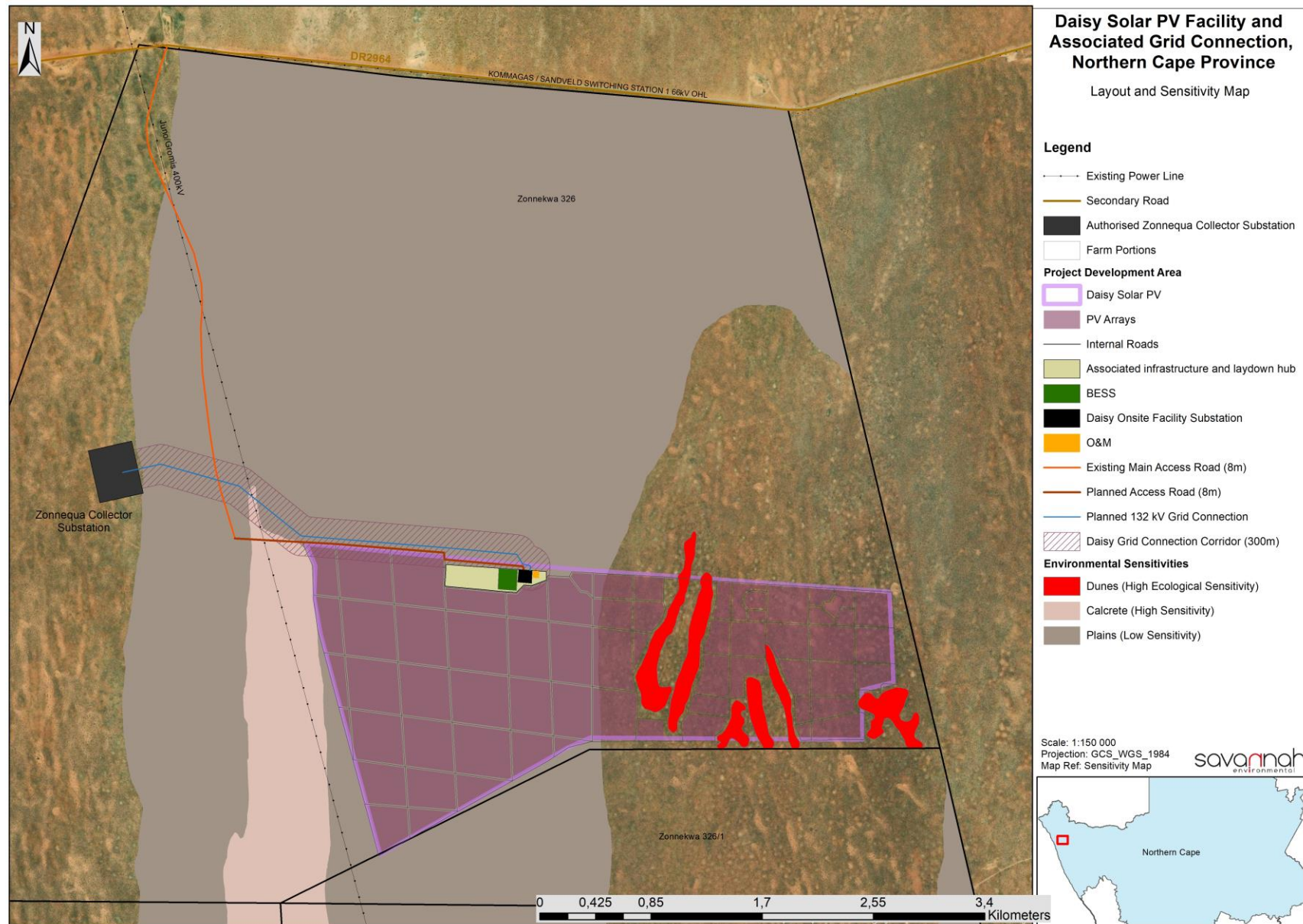


Figure 2.3: The Development Area of the Daisy Solar PV Facility, as assessed as part of the BA, overlain on the identified sensitive environmental features.

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 the Daisy Solar PV Facility. 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). This is a dynamic document and will be further developed in terms of specific requirements listed in any authorisations issued for the Daisy Solar PV Facility and/or as the Project develops. The EMPr has been developed as a set of environmental specifications (i.e., principles of environmental management). The specifications have been developed on the basis of the findings of the 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.

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 Daisy Solar PV Facility.
- » 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.

Energy Team (Pty) Ltd 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 Project Site. The adequacy and efficacy of implementation is to be monitored by an independent Environmental Control Officer (ECO). Since this EMPr is part of the BA process for the Daisy Solar PV Facility, 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 Competent Authority in writing. Similarly, any provisions in legislation overrule any provisions or interpretations within this EMPr.

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

CHAPTER 4: STRUCTURE OF THIS EMPR

The first three (3) chapters provide background to the EMPr and the Daisy Solar PV Facility, while the chapters which follow consider the following:

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

These chapters set out the procedures necessary for Energy Team (Pty) Ltd as the Project Developer, to minimise environmental impacts and achieve environmental compliance. For each of the phases of implementation, an over-arching environmental **goal** is stated. In order to meet this goal, a number of **objectives** are listed. The EMPr has been structured in table format in order to show the links between the goals for each phase and their associated objectives, activities/risk sources, mitigation actions, monitoring requirements and performance indicators. A specific EMPr table has been established for each environmental objective.

The information provided within the EMPr table for each objective is illustrated below:

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

Project component/s	List of project components affecting the objective, i.e.: » PV arrays; » Substation; » BESS; » Access roads; and » Associated infrastructure.
Potential Impact	Brief description of potential environmental impact if objective is not met.
Activity/risk source	Description of activities which could impact on achieving objective.
Mitigation: Target/Objective	Description of the target; include quantitative measures and/or dates of completion.

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 plan.
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 throughout the life of the Project whenever changes, such as the following, occur:

- » Planned activities change (i.e., in terms of the components of the Project).
- » 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.
- » Significant progress has been made in achieving an objective or target such that it should be re-examined to determine if it is still relevant or should be modified, etc.

4.1. Project Team

This EMPr was compiled by:

- » **Debbie-Lee Janse van Rensburg** holds a Bachelor of Arts in Psychology, Geography and Environmental Management and a BSc. Honours degree in Environmental Science from the North West University. Her key focus is on undertaking environmental authorisation applications, environmental permitting, public participation, environmental impact assessments, and GIS mapping.
- » **Karen Jodas** is the registered EAP for the project and is Director at Savannah Environmental (Pty) Ltd. Karen holds a Master of Science Degree and is registered as a Professional Natural Scientist (400106/99) with the South African Council for Natural Scientific Professions (SACNASP). She has gained extensive knowledge and experience on potential environmental impacts associated with electricity generation and transmission projects through her involvement in related EIA processes over the past 21 years. She has successfully managed and undertaken EIA processes for infrastructure development projects throughout South Africa.

In order to adequately identify and assess potential environmental impacts associated with the proposed Daisy Solar PV Facility, the following specialist sub-consultants have provided input into this EMPr Report:

Company	Specialist Area of Expertise	Specialist Name
Birds & Bats Unlimited	Avifauna	Rob Simmons and Marlei Martins
3Foxes Biodiversity Consulting	Ecology	Simon Todd
TerraAfrica	Soils and Agricultural Potential	Marinè Pienaar
LOGIS	Visual	Lourens du Plessis
CTS Heritage	Heritage and Palaeontology	Jenna Lavin
Eco Thunder	Social environment	Brogan Geldenhuys

The Savannah Environmental team have extensive knowledge and experience in EIA and environmental management, having been involved in EIA processes for more than sixteen (16) years. They have managed and drafted EMPrs for other power generation projects throughout South Africa, including numerous wind and solar energy facilities.

CHAPTER 5: ROLES AND RESPONSIBILITIES

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

For the purposes of the EMPr, the generic roles that need to be defined are those of the:

- » Project Developer;
- » Project Manager/Site Manager;
- » Environmental Control Officer (ECO);
- » Contractors; and
- » Contractor's Safety, Health and Environment Representative/Environmental Officer.

It is acknowledged that the specific titles for these functions may vary once the Project is implemented. The purpose of this section of the EMPr is to give a generic outline of what these roles typically entail. It is expected that this will be further defined during Project implementation.

i) The Project Developer

As the Project Developer, the Energy Team (Pty) Ltd must ensure that the implementation of the Project complies with the requirements of all environmental authorisations and all other permits, and obligations emanating from other relevant environmental legislation.

ii) Project Manager/Site Manager

The Project Manager/Site Manager is responsible for overall management of Project and EMPr implementation. The following tasks will fall within his/her responsibilities:

- » Be fully conversant with the EIA for the Project, the EMPr, the conditions of the EA, and all relevant environmental legislation.
- » Be fully knowledgeable with the contents of all relevant environmental and development licences and permits.
- » Be familiar with the recommendations and mitigation measures of this EMPr and implement these measures.
- » 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.
- » Monitor site activities on a daily basis for compliance.
- » Ensure that the EMPr is correctly implemented throughout the Project's life cycle by means of site inspections and meetings. This must be documented as part of the site meeting minutes.
- » Conduct internal audits of the construction site against the EMPr.
- » Confine the construction site to the demarcated area.
- » Rectify transgressions through the implementation of corrective action.

iii) Environmental Control Officer

A suitably qualified ECO⁴ 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 EA. Accordingly, the ECO will:

- » Be fully knowledgeable of the contents of the EIA Report.
- » Be fully knowledgeable of the contents of the conditions of the EA for the Project.
- » Be fully knowledgeable of the contents of the EMPr.
- » Be fully knowledgeable of all the licences and permits issued for the Project Site.
- » Be fully knowledgeable of the contents of all relevant environmental legislation.
- » Ensure that the contents of the EMPr are communicated to the Contractors' site staff and that the Project Manager/Site Manager and Contractors are constantly made aware of the contents through ongoing discussion.
- » Ensure that the compliance of the EMPr, EA and the legislation is monitored through regular and comprehensive inspection of the Project Site and surrounding areas.
- » Ensure that the Project Manager/Site Manager has input into the review and acceptance of construction methods and method statements or site-specific plans.
- » Ensure that if the EMPr, EA and/or the legislation conditions, regulations or specifications are not followed then appropriate measures are undertaken to address any non-compliances (for example an ECO may cease construction or an activity to prevent a non-compliance from continuing).
- » Ensure that any non-compliance or remedial measures that need to be applied are reported.
- » Keep records of all activities on the Project Site, problems identified, transgressions noted and a task schedule of tasks undertaken by the ECO.
- » Independently report to the DFFE in terms of compliance with the specifications of the EMPr and conditions of the EA.
- » Keep records of all reports submitted to DFFE.

The ECO must be present full-time on site 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 supervise any flora relocation and faunal rescue activities that may need to take place during the site clearing phase of Project implementation (i.e. during site establishment, and excavation of foundations). Thereafter, monthly compliance audits can be undertaken, provided that adequate compliance with the EA, environmental permits and EMPr is achieved. The developer should appoint a designated Environmental Officer (EO) to be present on-site to deal with any environmental issues as they arise. 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.

iv) EPC Contractors

The Lead Engineering, Procurement and Construction (EPC) Contractor is responsible for the following:

- » Ensure compliance with the EA, environmental permits and the EMPr at all times during construction.

⁴ The ECO should have a relevant degree or technical diploma in environmental management and at least 2 years' experience in the field.

- » Have the overall responsibility of the EMPr and its implementation.
- » Ensure that all appointed contractors and sub-contractors are aware of the EMPr and their respective responsibilities.
- » Provide all necessary supervision during the execution of the Project.
- » Comply with any special conditions as stipulated by landowners.
- » Inform and educate all employees about the environmental risks associated with the various activities to be undertaken, and highlight those activities which should be avoided during the construction process in order to minimise significant impacts to the environment.
- » Maintain an environmental register which keeps a record of all incidents which occur on the site during construction. These incidents include:
 - * Public involvement / complaints
 - * Health and safety incidents
 - * Hazardous materials stored on site
 - * Non-compliance incidents
 - * 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 Project Site.
- » Where construction activities are undertaken is close to any inhabited area, the necessary precautions shall be taken by the Contractor to safeguard the lives and property of the inhabitants.
- » ECO is to conduct audits to ensure compliance to the EMPr.
- » Ensure there is communication with the Project Manager, the ECO, and relevant discipline engineers on matters concerning the environment.
- » Should the Contractor require clarity on any aspect of the EMPr the Contractor must contact the ECO for advice.

Contractors and service providers must be aware of the responsibilities in terms of the relevant environmental legislation and the contents of this EMPr. 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 Contractor's obligations in this regard include the following:

- » Employees must have a basic understanding of the key environmental features of the Project Site and the surrounding environment.
- » A copy of the EMPr must be easily accessible to all on-site staff members.
- » Employees must be familiar with the requirements of this EMPr and the environmental specifications as they apply to the construction of the Project.
- » Prior to commencing any site works, all employees and sub-contractors must have attended an environmental awareness training course which must provide staff with an appreciation of the Project's environmental requirements, and how they are to be implemented.
- » Staff will be informed of environmental issues as deemed necessary by the 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 Project Manager/Site Manager (and ECO) for approval before any work is undertaken.

- » Any lack of adherence to the above will be considered as non-compliance to the specifications of the EMPr.
- » Ensuring that any instructions issued by the Project Manager/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 that they can constructively contribute towards the successful implementation of the EMPr (i.e. ensure their staff are appropriately trained as to the environmental obligations)

v) Contractor's Safety, Health and Environment Representative/Environmental Officer

The Contractor's Safety, Health and Environment (SHE) Representative/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. In addition, the SHE/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.

The Contractor's SHE/EO should:

- » Develop and Implement an Environmental and Social Management System (ESMS) for the Project's construction phase.
- » Be well versed in environmental matters.
- » Understand the relevant environmental legislation and processes.
- » Development and enforcement of MS on behalf of the contractor.
- » Understanding and implementation of the EMPr, EA and all other relevant permits.
- » 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.
- » Keep accurate and detailed records of all EMPr-related activities on the Project Site.

OBJECTIVE 2: Establish clear reporting, communication, and responsibilities during operation in relation to overall implementation of the EMPr during operation

Formal responsibilities are necessary to ensure that key procedures are executed during operation. Several professionals will form part of the operation team. For the purposes of the EMPr, the generic roles that need to be defined are those of the:

- » Operations Manager; and
- » Environmental Manager

It is acknowledged that the specific titles for these functions may vary once the Project is implemented. The purpose of this section of the EMPr is to give a generic outline of what these roles typically entail. It is expected that this will be further defined during Project implementation.

i) Operations Manager

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 findings and recommendations in management reviews and audits.
- » Provide forums to communicate matters regarding environmental management.

ii) Environmental Manager

The Environmental Manager will:

- » Develop and Implement an Environmental and Social Management System (EMS) for the operational phase of the Project.
- » Compile environmental policies and procedures.
- » Manage and report on the Solar PV Energy 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 and conservation authorities) on environmental performance and other issues.
- » Conduct environmental training and awareness for the employees who operate and maintain the Solar PV Energy Facility.
- » Liaise with interested and affected parties (IAPs) on environmental issues of common concern.
- » Conduct annual basis reviews of the EMPr to evaluate its effectiveness.
- » Take appropriate action as a result of findings and recommendations in management reviews and audits.
- » Provide forums to communicate matters regarding environmental management.

The Environmental Manager must provide fourteen (14) days written notification to the DFFE that the Daisy Solar PV Facility operational phase will commence.

CHAPTER 6: MANAGEMENT PROGRAMME: PLANNING AND DESIGN

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

- » Ensures that the design of the Project 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 identified environmental sensitivities, as well as any landowner and community concerns and that these are appropriately addressed through design and planning (where applicable).
- » Enables the construction activities to be undertaken without significant disruption to other land uses and activities in the area.
- » Ensures that the best environmental options are selected for the Project.

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

6.1. Objectives

OBJECTIVE 1: To ensure that the design of the facility responds to the identified environmental constraints and optimise low sensitivity environmental areas

If accepted by the Department of Forestry, Fisheries and the Environment (DFFE), the development area detailed in **Figure 2.2**, must be implemented. Cognisance of sensitive areas defined in **Figure 2.3** and detailed within the EIA Report should be considered when undertaking the final design of the Project.

Project component/s	<ul style="list-style-type: none"> » Solar PV array. » Inverters and transformers. » Cabling between the project components. » Balance of Plant. » On-site facility substation. » Onsite medium voltage (MV) switching station forming part of the collector substation. » Battery Energy Storage System (BESS). » Temporary Laydown areas. » Access roads, internal roads and fencing around the development area. » Up to 132kV Overhead Power Lines (OHPL) » Underground LV cabling will be used on the PV sites.
Potential Impact	<ul style="list-style-type: none"> » Design fails to respond optimally to the identified environmental considerations.
Activities/risk sources	<ul style="list-style-type: none"> » Positioning of PV arrays and alignment of access roads, power line and underground cabling. » Positioning of onsite substation and switching station. » Positioning of laydown areas. » Pre-construction activities, e.g. geotechnical investigations.

Mitigation: Target/Objective	<ul style="list-style-type: none"> » To ensure that the design of the Project responds to the identified environmental constraints and opportunities, including the constraints identified through the EIA process. » To ensure that pre-construction activities are undertaken in an environmentally friendly manner by e.g. avoiding identified sensitive areas. » Optimal planning of visual infrastructure to minimise visual impact.
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Mitigation: Action/control	Responsibility	Timeframe
Plan and conduct pre-construction activities in an environmentally responsible manner and in a manner that does not lead to unnecessary impacts and disturbance.	Project Developer EPC Contractor	Pre-construction
Consider design level mitigation measures recommended by the specialists, especially with respect to flora, fauna, and avifauna sites, as detailed within the BA Report and relevant appendices.	Project Developer EPC Contractor	Design phase
Ensure that laydown areas, construction camps and other temporary use areas are located in areas of low and medium sensitivity.	Project Developer EPC Contractor	Design phase
Existing watercourse crossings should be utilised/upgraded as far as possible.	Project Developer EPC Contractor	Design phase
Should watercourses need to be crossed for the construction of the power line or any of the proposed facility access roads, existing crossings need to be used and where necessary upgraded to avoid any additional impact on the watercourse.	Project Developer EPC Contractor	Design phase
Road infrastructure and cable alignments should coincide as far as possible to minimise the impact	Project Developer EPC Contractor	Design phase
Under no circumstances must new channels be created for flow diversion and conveyance purposes unless approved as part of an EA or WUL.	Developer EPC Contractor	Design phase
The minimum footprint areas of infrastructure should be used wherever possible, including road widths and lengths.	Project Developer EPC Contractor	Design phase
Internal power lines should be buried wherever possible.	Project Developer EPC Contractor	Design phase
Avoid all high agricultural production land and other actively cultivated areas. Where avoidance is not feasible, stakeholder engagement should occur to compensate affected landowners	Project Developer EPC Contractor	Design phase
Undertake careful design of security and operational lighting to minimise impacts on surrounding areas. No high mast lighting should be used.	Project Developer EPC Contractor	Design phase
The design of the proposed grid lines must be of a type or similar structure as endorsed by the Eskom-EWT Strategic Partnership on Birds and Energy, considering the mitigation guidelines recommended by Birdlife South Africa (Jenkins <i>et al.</i> , 2015).	EPC Contractor EO Engineer	Planning and construction
All areas to be developed must be walked through prior to any activity to ensure no nests or avifauna species are found in the area. Should any SCC be found and not move out of the area, or their nest be found in the area a suitably qualified specialist must be consulted to advise on the correct actions to be taken.	Project manager/Site manager EO Specialist – avifaunal	Planning, Decommissioning

Performance Indicator	» Design meets the objectives and does not degrade the environment.
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	» Design and layouts respond to the mitigation measures and recommendations in the EMP report.
Monitoring	» Ensure that the design implemented meets the objectives and mitigation measures in the EIA report through review of the facility design by the Project Manager/Site Manager and ECO prior to the commencement of construction.

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

Project Component/s	<ul style="list-style-type: none"> » PV arrays; » Substation; » BESS; » Access roads; and » Associated infrastructure.
Potential Impact	» Impact on identified sensitive areas.
Activities/Risk Sources	<ul style="list-style-type: none"> » Positioning of all Project components. » Pre-construction activities, e.g., geotechnical investigations, site surveys of substation footprint, power line servitude 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 Project responds to the identified environmental constraints and opportunities. » To ensure that the design of the power plant responds to the identified constraints identified through pre-construction surveys. » To ensure that pre-construction activities are undertaken in an environmentally friendly manner.

Mitigation: Action/Control	Responsibility	Timeframe
Obtain any additional environmental permits required prior to the commencement of construction. Copies of permits/licenses must be submitted to the DFFE and kept on site during the construction and operation phases of the Project.	Project Developer	Pre-construction
Obtain abnormal load permits for transportation of Project components to site (if required).	EPC Contractor(s)	Prior to construction
A detailed geotechnical investigation is required for the design phase for all infrastructure components.	Project Developer EPC Contractor	Design phase
Undertake ecological preconstruction walk-through of the final development footprint to identify and locate protected species that would be affected and that can be translocated.	Project Developer Specialist - Ecologist	Pre-construction
The necessary biodiversity permits must be obtained prior to removal of any species of concern. Search and rescue of species of conservation concern should be conducted prior to clearing activities.	Project Developer Specialist - Ecologist	Pre-construction
A stormwater management plan must be developed in the pre-construction phase, detailing the	EPC Contractor(s)	Design phase

Mitigation: Action/Control	Responsibility	Timeframe
stormwater structures and management interventions that must be installed to manage the increase of surface water flows directly into any natural systems. The stormwater control systems must be inspected on an annual basis to ensure these are functional. Effective stormwater management must include effective stabilisation (gabions and Reno mattresses) of exposed soil and the re-vegetation of any disturbed riverbanks.		
Develop an Alien Invasive and Vegetation Rehabilitation Management Plan.	Project Developer	Pre-construction
Develop a detailed method statement for the implementation of the Plant Rescue and Protection Plan for the Project Site (refer to Appendix E).	Project Developer	Pre-construction
Develop a detailed method statement for the implementation of the Re-vegetation and Habitat Rehabilitation Plan for the site (refer to Appendix D).	Project Developer	Pre-construction
Develop a detailed method statement for the implementation of the traffic and transportation management plan for the site (refer to Appendix F).	Project Developer	Pre-construction
Develop an effective monitoring system to detect any leakage or spillage of all hazardous substances during their transportation, handling, use and storage. This must include precautionary measures to limit the possibility of oil and other toxic liquids from entering the soil or storm water systems.	Project Developer	Pre-construction
Prepare a detailed Fire Management Plan in collaboration with surrounding landowners.	Project Developer	Pre-construction
A comprehensive rehabilitation / monitoring plan must be developed in consultation with a specialist, and must be implemented from the Project onset i.e. during the detailed design phase prior to construction, to ensure a net benefit to the environment within all areas that will remain undisturbed.	Project Developer EPC Contractor Specialist – ecologist & agriculturalist	Pre-construction

Performance Indicator	» Permits are obtained and relevant conditions complied with.
	» Relevant management plans and Method Statements prepared and implemented.
Monitoring	» Monitor ongoing compliance with the EA, EMPr, management plans and MS.

OBJECTIVE 3: Ensure compliance of required mitigation measures and recommendations by contractors

Project Component/s	» PV arrays; » Substation; » BESS; » Access roads; and
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	» Associated infrastructure.
Potential Impact	<ul style="list-style-type: none"> » Impact on identified sensitive areas. » Planning fails to respond optimally to the environmental considerations.
Activities/Risk Sources	<ul style="list-style-type: none"> » Positioning of all Project components » Positioning of temporary sites that will be used during construction. » Employment and procurement procedures.
Mitigation: Target/Objective	<ul style="list-style-type: none"> » To ensure that appropriate planning is undertaken by the EPC Contractor to ensure compliance with the conditions of the EA and EMPr, management plans and MS. » To ensure that pre-construction and construction activities are undertaken in a controlled and monitored manner to reduce and avoid damage.

Mitigation: Action/Control	Responsibility	Timeframe
The terms of this EMPr and the EA must be included in all tender documentation and EPC Contractor contracts.	Project Developer EPC Contractor	Pre-construction
The Project Developer should encourage the EPC Contractor to increase the local procurement practices and promote the employment of people from local communities, as far as feasible, to maximise the benefits to the local economies.	EPC Contractor	Pre-construction

Performance Indicator	<ul style="list-style-type: none"> » Conditions of the EA and EMPr form part of all EPC Contractor contracts. » Local employment and procurement are encouraged.
Monitoring	» Monitor ongoing compliance with the EA, EMPr, management plans and MS.

OBJECTIVE 4: To ensure effective communication mechanisms

It is important to maintain on-going communication with the public (including affected and surrounding landowners) during the planning/design, construction and operation phases of the Daisy Solar PV Facility. Any issues and concerns raised should be addressed as far as possible in as short a timeframe as possible.

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

Mitigation: Action/control	Responsibility	Timeframe
<p>Compile and implement an External Grievance Mechanism Procedure for the public (including the affected and surrounding landowners) (using Appendix B) to be implemented during both the construction and operation phases of the Project and if applicable during decommissioning. This procedure should include the 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. The mechanism must also include procedures to lodge complaints in order for the local community to express any complaints or grievances with the construction process.</p> <p>A Public Complaints register must be maintained by the EPC Contractor to record all complaints and queries relating to the Project and the actions taken to resolve the issue.</p> <p>A Project Specific Grievance Mechanism must be developed and implemented prior to construction.</p>	Project Developer EPC Contractor O&M Operator	Pre-construction (construction procedure) Pre-operation (operation procedure)
Develop and implement an Internal Grievance Mechanism Procedure 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.	Project Developer EPC Contractor O&M Operator	Pre-construction (construction procedure) Pre-operation (operation procedure)
Have a detailed consultation and Stakeholder Engagement Plan (SEP) with neighbouring property owners to keep them informed with regards to construction progress, issues and potential dangers	Project Developer	Pre-construction

Performance Indicator	» Effective internal and external Grievance Mechanism as well as SEP in place for all phases as required.
Monitoring	» An incident reporting system used to record non-conformances to the EA, EMPr, management plans or MS. » Internal and External Grievance Mechanism procedures implemented. » Public complaints register developed and maintained.

CHAPTER 7: MANAGEMENT PROGRAMME: CONSTRUCTION

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

- » Ensures that construction activities are properly 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, protected tree species, and habitats of ecological value.
- » Minimises impacts on fauna using the Project Site.
- » Minimises the impact on heritage sites should they be uncovered.
- » Ensures rehabilitation of disturbed areas following the execution of the works, such that residual environmental impacts are remediated or curtailed.

An environmental baseline must be established during the undertaking of construction activities, where possible.

7.1. Objectives

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

OBJECTIVE 1: Site establishment and Security Measures

Project component/s	<ul style="list-style-type: none"> » PV arrays; » Substation; » BESS; » Access roads; and » Associated infrastructure.
Potential Impact	<ul style="list-style-type: none"> » Hazards to landowners and the public. » Security of materials, equipment and machinery. » Substantially increased damage to natural vegetation. » Potential impact on flora, fauna and avifauna habitat.
Activities/risk sources	<ul style="list-style-type: none"> » Open excavations (foundations and cable trenches). » Movement of construction phase employees, vehicles and plant equipment in the area and on-site.
Mitigation: Target/Objective	<ul style="list-style-type: none"> » Implementation of security protocols for the Project Site against unauthorised entry. » To protect members of the public/landowners/residents.

Mitigation: Action/control	Responsibility	Timeframe
Implement adequate security and safety measures for the site, working areas and excavations. Adequate protective measures must be implemented to prevent unauthorised access to the Project Site, working areas and the internal access/haul routes.	EPC Contractor EO	During site establishment Maintenance: for duration of Contract
The EPC Contractor must take all reasonable measures to ensure the safety of the public in the surrounding area. Where the public could be exposed to danger by any of the works or site activities, the EPC Contractor must, as appropriate, provide suitable flagmen, barriers and/or warning signs in English and any other relevant indigenous languages, all to the approval of the Site Manager/Project Manager. All unattended open excavations shall be adequately demarcated and/or fenced.	EPC Contractor	During site establishment Maintenance: for duration of Contract
Where necessary to control access (for specific working areas), fence and secure the area and implement access control procedures.	EPC Contractor	During site establishment Maintenance: for duration of Contract
Establish SABS 089: 1999 Part 1 approved bunded areas for the storage of hazardous materials and hazardous waste.	EPC Contractor	During site establishment and during construction
Supply adequate weather and vermin proof waste collection bins and skips (covered at minimum with secured netting or shade cloth) at sites where construction is being undertaken. Separate bins should be provided for general and hazardous waste. As far as possible, provision should be made for separation of waste for recycling.	EPC 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 (1 toilet per every 15 workers for both males and females) at appropriate locations on site.	EPC Contractor	During site establishment and during construction

Performance Indicator	<ul style="list-style-type: none"> » Ensure that the Project Site is secure and there is no unauthorised entry. » No members of the public/ landowners injured as a result of construction activities. » Fauna and flora are protected as far as practically possible. » Appropriate and adequate waste management and sanitation facilities provided at construction site.
Monitoring	<ul style="list-style-type: none"> » Regular visual inspection of the fence for signs of deterioration/forced access. » An incident reporting system must be used to record non-conformances to the EA, EMPr, management plans and MS. » Public complaints register must be developed and maintained for the Project Site. » ECO/ EO to monitor all active construction areas on a continuous basis until construction is complete; reporting back to the Site Manager/Project Manager. » ECO/ EO to address any infringements with responsible EPC contractor as soon as these are recorded.

OBJECTIVE 2: Appropriate management of the construction site and construction workers

Project Component/s	<ul style="list-style-type: none"> » PV arrays; » Substation; » BESS; » Access roads; and » Associated infrastructure.
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 EA, EMPr, management plans and MS leading to unnecessary impacts on the surrounding environment. » Compaction from movement of machinery. » Leakages from Hydrocarbons.
Mitigation: Target/Objective	<ul style="list-style-type: none"> » Limit equipment storage areas/footprint within demarcated and designated areas. » Ensure adequate sanitation facilities and waste management practices. » Ensure appropriate management of actions by on-site personnel in order to minimise impacts to the surrounding environment.

Mitigation: Action/Control	Responsibility	Timeframe
Restrict the activities and movement of construction workers and vehicles to the immediate construction site and existing access roads.	EPC Contractor	Construction
All construction vehicles must adhere to clearly defined and demarcated roads. No driving outside of the Development Footprint will be permitted, unless authorised.	EPC Contractor	Construction
Ensure all construction equipment, machinery and vehicles are properly maintained at all times.	EPC Contractor	Construction
Ensure proper health and safety plans in place during the construction period to ensure safety on and around site during construction	HSE	Pre-construction
Ensure that construction workers are clearly identifiable. All workers must wear identifiable clothing.	EPC Contractor	Construction
Undertake pre-construction environmental induction for all construction staff on site to ensure that basic environmental principles are adhered to. Induction training should cover the following principles: <ul style="list-style-type: none"> • Waste management activities and littering, • appropriate handling of pollution and chemical spills, • avoiding fire hazards, 	EPC Contractor	Construction

Mitigation: Action/Control	Responsibility	Timeframe
<ul style="list-style-type: none"> minimising wildlife interactions (not harming or collecting species such as tortoises and snakes which are often persecuted out of fear or superstition) remaining within demarcated construction areas., 		
Regular toolbox talks should be undertaken to ensure appropriate levels of environmental awareness.	EPC Contractor	Construction
Contact details of emergency services must be prominently displayed at the construction site camp notice board.	EPC Contractor	Construction
Contractor must provide adequate firefighting equipment on site and provide firefighting training to selected construction staff.	EPC 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	Duration of construction
Personnel trained in first aid must be on site to deal with smaller incidents that require medical attention.	EPC Contractor	Construction
All work in the vicinity of any watercourses will be done in accordance with the approved MS (which will provide guidance on what activities can be done and not done within the watercourse area). Any deviation from the MS, unless authorised by the ECO will be recorded as a non-conformance.	EPC Contractor	Construction
Ensure that rubble, litter, and disused construction materials are appropriately stored at the designated waste management yard and then disposed regularly at licensed waste facilities. The waste management yard needs to be maintained and managed in accordance with the approved MS.	EPC Contractor	Duration of Contract
All litter/waste 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.	EPC Contractor and sub-contractor/s	Duration of contract
All sewage disposal (from mobile toilets) to take place at a registered and operational wastewater treatment works. Proof of disposal to be retained as proof of responsible disposal.	EPC Contractor	Duration of construction
All contaminated water must be contained by means of careful run-off management on site.	EPC Contractor	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.	EPC Contractor	During construction.
Keep a record of all hazardous substances stored on site. Clearly label all the containers storing hazardous waste.	EPC Contractor	Duration of contract

Mitigation: Action/Control	Responsibility	Timeframe
Ensure ablution facilities are appropriately maintained. Ablutions must be cleaned regularly, and the associated waste products disposed of at a registered/permited disposal facility. Mobile Toilets must be removed from site when construction is completed.	EPC 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 Project Site or surrounds.	EPC Contractor and sub-contractor/s	Duration of contract
A MS must be compiled for the management of pests and vermin within the site, specifically relating to the canteen area if applicable.	EPC Contractor	Construction
Ensure proper health and safety plans in place during the construction period to ensure safety on and around the Project Site during construction, including fencing of the property and site access restriction.	EPC Contractor and sub-contractor/s	Pre-construction
All disturbed areas that are not used such as excess road widths, should be rehabilitated with locally occurring shrubs and grasses after construction to reduce the overall footprint of the development.	EPC Contractor and sub-contractor/s	Construction
On completion of the construction phase, all construction workers must leave the Project Site within one week of their contract ending.	EPC Contractor and sub-contractor/s	Construction

Performance Indicator	<ul style="list-style-type: none"> » Appropriate training of all staff is undertaken prior to them commencing work on the Project Site. » Ablution and waste removal facilities are in a good working order and managed in accordance with the relevant MS as to 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 have been received.
Monitoring	<ul style="list-style-type: none"> » Regular audits of the construction camps and areas of active construction on the Project 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 must be used to record non-conformances to the EA, EMP, management plans and MS. » Observation and supervision of Contractor practices throughout the construction phase by the EO. » Complaints will be investigated and, if appropriate, acted upon.

OBJECTIVE 3: Maximise benefits and opportunities associated with the construction phase

It is acknowledged that some skilled personnel will be required during the construction phase of the Project. However, where semi-skilled and unskilled labour is required, opportunities for local employment should be maximised as far as possible. Employment of locals and the involvement of local Small, Micro and Medium

Enterprises (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	» Construction activities associated with the establishment of the Project, including associated infrastructure.
Potential Impact	» The opportunities and benefits associated with the creation of local employment and business should be maximised.
Activities/risk sources	» The employment of outside contractors to undertake the work and who make use of their own labour will reduce the employment and business opportunities for locals. Employment of local labour will maximise local employment opportunities.
Mitigation: Target/Objective	» The EPC Contractor, in discussions with the local municipality, should aim to employ as many workers (skilled, semi-skilled / low-skilled) from the local areas/ towns, as possible. » The Project Developer should also develop a database of local BBBEE service providers.

Mitigation: Action/control	Responsibility	Timeframe
Where feasible, effort must be made to employ locally in order to create maximum benefit for the communities.	EPC Contractor	Construction
Where feasible, effort must be made to employ local labour in order to create maximum benefit for the communities and limit in-migration.	EPC Contractor	Construction

Performance Indicator	» Maximise the number of semi-skilled and unskilled labour sourced locally where possible. » Maximise the use of local suppliers and SMMEs where possible. » Skills transfer facilitated where possible.
Monitoring and Reporting	» Contractors and appointed ECO must monitor indicators listed above to ensure that they have been met for the construction phase.

OBJECTIVE 4: Control of noise pollution stemming from construction activities

Various construction activities would be taking place during the development of the Project and may pose a noise risk to the sensitive receptors located around the project site. The impact of such activities, in general, is very low. Impacts may however occur where activities are undertaken at night.

Project component/s	» PV arrays; » Substation; » BESS; » Access roads; and » Associated infrastructure.
Potential Impact	» Increased noise levels at potentially sensitive receptors.
Activity/risk source	» Site preparation and earthworks. » Construction-related transport. » Foundations or plant equipment installation. » Building activities.
Mitigation: Target/Objective	» Ensure compliance with the National Noise Control Regulations. » Ensure that maximum noise levels at potentially sensitive receptors are less than 65dBA. » Ensure night-time noise levels less than 45 dBA.

- » Reduce and restrict, where possible the generation of disturbing or nuisance noises.

Mitigation: Action/control	Responsibility	Timeframe
Communicate the External Grievance Mechanism to all stakeholders.	Project Developer	Construction
Construction activities should be undertaken between 07:00 and 18:00 unless otherwise permitted and authorised by the relevant municipal authorities per the approved MS and as communicated to the affected stakeholders.	Project Developer	Construction
Ensure that all equipment is maintained and fitted with the required noise abatement equipment.	EPC Contractor	Weekly inspection
The construction crew must abide by the local by-laws regarding noise.	EPC Contractor	Construction phase

Performance Indicator	<ul style="list-style-type: none"> » Construction activities do not change the existing ambient sound levels with more than 7dB. » Ensure that maximum noise levels at potentially sensitive receptors are less than 65 dBA. » No noise complaints are registered.
Monitoring and Reporting	<ul style="list-style-type: none"> » Monitoring of noise levels associated with construction activities, especially near to sensitive receptors.

OBJECTIVE 5: Management of dust and emissions and damage to roads

During the construction phase, limited gaseous or particulate emissions (and dust) and dust is anticipated from construction vehicles, machinery and equipment on-site.

Project component/s	<ul style="list-style-type: none"> » PV arrays; » Substation; » BESS; » Access roads; and » Associated infrastructure.
Potential Impact	<ul style="list-style-type: none"> » Dust impacts can occur from cleared areas and from vehicle movement along internal roads. » Release of minor amounts of air pollutants (for example NO₂, CO and SO₂) from vehicles and construction equipment and machinery.
Activities/risk sources	<ul style="list-style-type: none"> » The movement of construction vehicles and their activities on the site. » Clearing of vegetation and topsoil. » Excavation, grading and scraping. » Transport of materials, equipment and components. » Re-entrainment of deposited dust by vehicle movements. » Wind erosion from topsoil and spoil stockpiles and unsealed roads and surfaces. » Fuel burning from construction vehicles with combustion engines.
Mitigation: Target/Objective	<ul style="list-style-type: none"> » To avoid and or minimise the potential dust impacts associated with heavy vehicles, and also minimise damage to roads. » To ensure emissions from all vehicles are minimised, where possible, for the duration of the construction phase.

	» To minimise nuisance to the community and adjacent landowners from dust emissions and to comply with workplace health and safety requirements for the duration of the construction phase.
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Mitigation: Action/control	Responsibility	Timeframe
Reduce and control dust emissions by using approved dust suppression techniques as and when required.	EPC Contractor	Construction phase
Vehicles used to transport sand and building materials must be fitted with tarpaulins or covers when travelling on roads.	EPC Contractor	Construction phase
Ensure vehicles adhere to the speed limit of 40km/h on public roads and speed limits set within the Project Site by the Site Manager.	EPC Contractor Transportation contractor	Duration of contract
Ensure that damage to gravel public roads and access roads attributable to construction vehicles is repaired before completion of the construction phase.	EPC Contractor	Before completion of construction phase
Disturbed areas must be re-vegetated as soon as practicable after construction is complete in an area.	EPC Contractor	At completion of the construction phase

Performance Indicator	<ul style="list-style-type: none"> » Appropriate dust suppression measures implemented on the Project Site during the construction phase. » Drivers made aware of the potential safety issues and enforcement of strict speed limits when they are employed or before entering the Project site.
Monitoring and Reporting	<ul style="list-style-type: none"> » The Developer and appointed EO must monitor indicators listed above to ensure that they have been met for the construction phase. » Immediate reporting by personnel of any potential or actual issues with nuisance dust or emissions to the Site Manager/Project Manager. » An incident reporting system must be used to record non-conformances to the EA, EMPr, management plans and Method Statements. » Public complaints register must be developed and maintained on the Project Site.

OBJECTIVE 6: Conservation of the existing soil resource within the site and in the adjacent areas

The natural soil on the Project Site needs to be preserved as far as possible to minimise impacts on the environment. Soil degradation including erosion (by wind and water) and subsequent deposition elsewhere is of a concern. Uncontrolled run-off relating to construction activities (excessive wetting, etc.) will also lead to accelerated erosion. Degradation of the natural soil profile due to excavation, stockpiling, compaction, pollution and other construction activities will affect soil forming processes and associated ecosystems.

A set of strictly adhered to mitigation measures are required to be implemented in order to effectively limit the impact on the environment. The disturbed areas where human impact is likely are the focus of the mitigation measures laid out below.

Project component/s	<ul style="list-style-type: none"> » PV arrays; » Substation; » BESS;
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	<ul style="list-style-type: none"> » Access roads; and » Associated infrastructure.
Potential Impact	<ul style="list-style-type: none"> » Erosion and soil loss. » Increased runoff. » Downstream sedimentation.
Activities/risk sources	<ul style="list-style-type: none"> » Rainfall and wind erosion of disturbed areas. » Excavation, stockpiling and compaction of soil. » Concentrated discharge of water from construction activity. » Stormwater run-off from sealed surfaces. » Mobile construction equipment movement on site. » Roadside drainage ditches. » Project related infrastructure, such as buildings, solar panels and fences.
Mitigation: Target/Objective	<ul style="list-style-type: none"> » To minimise erosion of soil from site during construction. » To minimise damage to vegetation by erosion or deposition. » To retain all topsoil.

Mitigation: Action/control	Responsibility	Timeframe
Any erosion problems observed along access roads, or any hardened/engineered surface should be rectified immediately and monitored thereafter to ensure that they do not re-occur.	EPC Contractor	Construction
All denuded areas, affected by the development, should be re-vegetated with locally occurring species, to bind the soil and limit erosion potential where applicable.	EPC Contractor EO ECO	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.	EPC Contractor EO	Construction
Roads and other disturbed areas should be regularly monitored for signs of erosion. These areas should be monitored by the EO to assess the success of the remediation.	EPC Contractor EO	Construction
Topsoil must be removed and stored separately from subsoil. Topsoil must be reapplied where appropriate as soon as possible in order to encourage and facilitate rapid regeneration of the natural vegetation on cleared areas.	EPC Contractor ECO EO	Construction
Stockpile topsoil for re-use in rehabilitation phase. Maintain stockpile shape and protect from erosion.	EPC Contractor	Construction
Salvaging topsoil: <ul style="list-style-type: none"> » Topsoil must always be salvaged and stored separately from subsoil and lower-lying parent rock or other spoil material. <ul style="list-style-type: none"> * Topsoil stripping removes up to 30 cm or less of the upper soils. * In cultivated areas, depth of topsoil may increase and needs to be confirmed with the landowner. » Prior to salvaging topsoil the depth, quality and characteristics of topsoil should be known for every management area. <ul style="list-style-type: none"> * This will give an indication of total volumes of topsoil that need to be stored to enable the proper planning and placement of topsoil storage. * Different types of topsoil – rocky soils and sands or loams must be stored separately. 	EPC Contractor	Construction

Mitigation: Action/control	Responsibility	Timeframe
Topsoil should be removed (and stored) under dry conditions to avoid excessive compaction whenever topsoil will have to be stored for longer than one year.		
Excavated soils should be stockpiled on the upslope side of the excavated trench so that eroded sediments off the stockpile are washed back into the trench.	EPC Contractor	Construction
<p>Storing topsoil:</p> <ul style="list-style-type: none"> » Viability of stored topsoil depends on moisture, temperature, oxygen, nutrients and time stored. » Rapid decomposition of organic material in warm, moist topsoil rapidly decreases microbial activity necessary for nutrient cycling and reduces the amount of beneficial micro-organisms in the soil. » Stockpile location should ideally be in a disturbed but weed-free area. » Storage of all topsoil that is disturbed should be of a maximum height of 2 m and the maximum length of time before re-use is 18 months. » Topsoil handling should be reduced to stripping, piling (once), and re-application. Between the stockpiling and reapplication, stored topsoil should not undergo any further handling except control of erosion and (alien) invasive vegetation. » Where topsoil can be reapplied within six months to one year after excavation, it will be useful to store the topsoil as close as possible to the area of excavation and re-application, e.g. next to cabling trenches. » Do not mix overburden with topsoil stockpiles, as this will dilute the proportion of fertile soil (with less fertile subsoil or rock material). » Employ wind nets made from Hessian or similarly fibrous and biodegradable material, where required, to stabilise newly placed topsoil stockpiles and to reduce wind erosion. » In cases where topsoil has to be stored longer than 6 months or during the rainy season, soils should be kept as dry as possible and protected from erosion and degradation by: <ul style="list-style-type: none"> * Preventing ponding on or between heaps of topsoil * Covering topsoil berms * Preventing all forms of contamination or pollution * Preventing any form of compaction * Monitoring the establishment of all invasive vegetation and removing such if it appears * Keeping slopes of topsoil at a maximal 2:1 ratio * Monitoring and mitigating erosion where it appears <p>Where topsoil needs to be stored in excess of one year, it is recommended to either cover the topsoil or allow an indigenous grass cover to grow on it – if this does not happen spontaneously, seeding should be considered.</p>	EPC Contractor	Construction
Excavated soils will need to be replaced in the same order as excavated from the trench, i.e. sub-soil must be replaced first	EPC Contractor	Construction

Mitigation: Action/control	Responsibility	Timeframe
and topsoil must be replaced last (this will maximise opportunity for re-vegetation of disturbed areas).		
Re-applied topsoil needs to be re-vegetated as soon as possible.	EPC Contractor	Construction
Only the proposed access roads as per the Development Footprint are to be used to reduce any unnecessary compaction.	EPC Contractor	Construction
Silt traps should be used where there is a danger of topsoil eroding and entering streams and other sensitive areas. These silt traps must be regularly monitored and maintained and replaced / repaired immediately as and when required. These measures should be regularly checked, maintained and repaired when required to ensure that they are effective.	EPC Contractor	Construction
Spillages of cement to be cleaned up immediately and disposed or re-used in the construction process.	EPC Contractor	Construction
Spill kits to be kept on active parts of the construction site and at site offices.	EPC Contractor	Construction
In instances where mobile cement batching is not available on site, cement batching to take place in designated areas only, as approved on site layout plan (if applicable).	EPC Contractor	Construction

Performance Indicator	<ul style="list-style-type: none"> » Minimal level of soil erosion around the Project Site. » No construction activity outside demarcated working areas. » Progressive return of disturbed and rehabilitated areas to the desired end state. » No indications of visible topsoil loss.
Monitoring and Reporting	<ul style="list-style-type: none"> » Continual inspections of the site by the EO. » Reporting of ineffective sediment control systems and rectification as soon as possible. » If soil loss is suspected, acceleration of soil conservation and rehabilitation measures must be implemented.

OBJECTIVE 7: Minimise impacts on sensitive areas and plant species

Project component/s	<ul style="list-style-type: none"> » PV arrays; » Substation; » BESS; » Access roads; and » Associated infrastructure.
Potential Impact	<ul style="list-style-type: none"> » Loss of plant cover leading to loss of faunal habitat and loss of specimens of protected plants. » Soil erosion. » Increased water use.
Activity/risk source	<ul style="list-style-type: none"> » Site preparation and clearing. » Soil disturbance. » Introduction of plant propagules with people and vehicles. » Activities outside of designated construction areas. » Driving off designated routes.

Mitigation:	» To limit construction activities to designated areas.
Target/Objective	» Implement invasive plant clearing prior to construction, but after site demarcation.

Mitigation: Action/control	Responsibility	Timeframe
Communicate clearly to all contractors that no disturbance outside the demarcated areas will be tolerated.	EPC Contractor	Construction
Demarcate all areas to be cleared with construction tape or other appropriate and effective means. However, caution should be exercised to avoid using material that might entangle fauna.	EPC Contractor	Construction
Before construction commences individuals of listed species within the Development Footprint that would be affected, should be counted and marked and translocated where deemed necessary by the ecologist conducting the pre-construction walk-through survey, and according to the ratios that will be recommended by specialists.	EPC Contractor Specialist – Ecologist EO ECO	Pre-construction Construction
Any individuals of protected species affected by and observed within the Development Footprint during construction should be translocated under the supervision of the ECO and/or Contractor's Environmental Officer (EO).	EPC Contractor ECO EO	Construction
No plants may be translocated or otherwise uprooted or disturbed for rehabilitation without express permission from the ECO and or Contractor's EO.	EPC Contractor ECO EO	Construction
No fires are allowed within the Development Footprint boundary as there is a risk of runaway veld fires.	EPC Contractor	Construction
No firewood collection is allowed within the Development Footprint.	EPC Contractor	Construction
Regular monitoring for alien plants within the Development Footprint as well as adjacent areas which receive runoff from the facility must be undertaken as these are also likely to be prone to invasion problems.	EPC Contractor	Construction
Regular alien clearing should be conducted using the best-practice methods for the species concerned. The use of herbicides should be avoided as far as possible.	EPC Contractor	Construction
ECO and/or Contractor's EO to provide supervision and oversight of vegetation clearing activities and other activities which may cause damage to the environment, especially at the initiation of the Project, when the majority of vegetation clearing is taking place.	Contractor EO ECO	Construction
Unnecessary impacts on surrounding natural vegetation must be avoided. The construction impacts must be contained to the Development Footprint of the Project.	EPC Contractor	Construction
Where new roads need to be constructed, the existing road infrastructure should be rationalised, and any unnecessary roads decommissioned and rehabilitated to reduce the disturbance of the area.	EPC Contractor	Construction
All vehicles to remain on demarcated roads and no unnecessary driving in the veld outside these areas should be allowed.	EPC Contractor	Construction

Mitigation: Action/control	Responsibility	Timeframe
Avoid creating conditions in which alien plants may become established: » Keep disturbance of indigenous vegetation to a minimum. » Rehabilitate disturbed areas as quickly as possible once construction is complete in an area. » Do not import soil from areas with alien plants.	EPC Contractor ECO EO	Construction
Establish an on-going monitoring programme to detect, quantify and remove any alien species that may become established and identify the problem species (as per Conservation of Agricultural Resources Act and Act 43 of 1983 and NEM: Biodiversity Act).	EPC Contractor ECO EO	Construction
Immediately control any alien plants that become established using registered control methods appropriate for the particular species in question. Where necessary, obtain an opinion from a registered Pest Control Officer.	EPC Contractor ECO EO	Construction
All alien plant re-growth must be monitored and should these alien plants reoccur these plants should be re-eradicated. The scale of the development does however not warrant the use of a Landscape Architect and / or Landscape Contractor.	EPC Contractor ECO EO	Construction
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 (a registered Pest Control Officer). It must be ensured that WHO Recommended Classification of Pesticides by Hazard Class 1a (extremely hazardous) or 1b (highly hazardous) are not purchased, stored or used on site along with any other nationally or internationally similarly restricted/banned products.	EPC Contractor ECO EO	Construction
A registered Pest Control Officer must be appointed to implement the invasive alien plants and weeds management plan. The Pest Control Officer must supervise the clearing team to ensure compliance with the invasive alien plants and weeds management plan.	EPC Contractor ECO EO	Construction
All cleared areas should be revegetated with indigenous perennial species from the local area.	EPC Contractor ECO EO	Construction

Performance Indicator	» No disturbance outside of designated work areas. » Limited alien infestation within the Project's Development Footprint. » Construction activities need to be restricted to the Development Footprint.
Monitoring and Reporting	» Observation of vegetation clearing activities by the EO throughout the construction phase. » Monitoring of alien plant establishment within the Development Footprint on an on-going basis.

OBJECTIVE 8: Protection of terrestrial fauna and avifauna

Project component/s	<ul style="list-style-type: none"> » PV arrays; » Substation; » BESS; » Access roads; and » Associated infrastructure.
Potential Impact	<ul style="list-style-type: none"> » Vegetation clearance and associated impacts on faunal habitats. » Traffic to and from the Project Site. » Disturbance of avifaunal species (e.g. destruction of habitat). » Displacement of avifaunal species » Collision with Project components. » Electrocution by means of powerline collision
Activity/risk source	<ul style="list-style-type: none"> » Site preparation and earthworks. » Installation of foundations or plant equipment. » Movement of mobile construction equipment on site. » Access road construction activities. » Substation construction activities. » Powerline construction activities.
Mitigation: Target/Objective	<ul style="list-style-type: none"> » To minimise footprints of habitat destruction. » To minimise disturbance to resident and visitor faunal species. » To minimise 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 fauna and their habitats is restricted.	EPC Contractor	Construction
Outside lighting should be limited to minimize impacts on fauna. All outside lighting should be directed away from highly sensitive areas. Fluorescent and mercury vapour lighting should be avoided, and sodium vapour (red/green) lights should be used wherever possible.	Project manager/Site Manager EO Design Engineer	Construction
The movement of construction personnel should be restricted to the construction areas on the Project Site.	EPC Contractor	Construction
The appointed EO must be trained to identify the potential Red Data species as well as the signs that indicate possible breeding by these species.	EPC Contractor EO	Construction
The EO must, during audits/site visits, make a concerted effort to look out for such breeding activities of SCCs.	EPC Contractor EO	Construction
All areas to be developed must be walked through once prior to any activity to ensure no nests or avifauna species are found in the area. Should any SCC be found and not move out of the area, or their nest be found in the area a suitably qualified specialist must be consulted to advise on the correct actions to be taken.	Project manager/Site manager EO Avifaunal Specialist	Construction
If any avifaunal SCCs are confirmed to be breeding (e.g., if a nest site is found), construction activities an avifaunal specialist is to be contacted immediately for further assessment of the situation and instruction on how to proceed.	EPC Contractor EO ECO Specialist - avifaunal	Construction
Any excavations should not be left open for extended periods of time to prevent entrapment by ground dwelling avifauna or their	EPC Contractor	Construction

Mitigation: Action/control	Responsibility	Timeframe
young and only be dug when required and filled in soon thereafter.		
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.	EPC Contractor	Construction
All personnel should undergo environmental induction with regards to avifauna and in particular awareness about not harming, collecting, or hunting terrestrial species and owls, which are often persecuted out of superstition. Signs must be put up to enforce this.	EO	Construction
The EO should provide 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.	EPC Contractor EO	Construction
All construction and maintenance motor vehicle operators should undergo an environmental induction that includes instruction on the need to comply with speed limit (40km/h), to respect all forms of wildlife. Speed limits must still be enforced to ensure that road killings and erosion is limited.	Health and Safety Officer	Construction
No faunal species may be harmed, collected, or hunted on the Project Site	EPC Contractor ECO EO	Construction
The duration of the construction should be kept to a minimum to avoid disturbing avifauna.	Project manager/Site Manager EO Design Engineer	Construction
All traffic on the Project Site will adhere to the set speed limit (40km/h), to respect all forms of wildlife. Speed limits must still be enforced to ensure that road killings and erosion is limited.	Health and Safety Officer	Construction
All Project activities must be undertaken with appropriate noise mitigation measures to avoid disturbance to avifauna population in the region	Project manager/Site manager EO	Construction
All the parts of the infrastructure must be nest proofed and anti-perch devices placed on areas that can lead to electrocution	EPC Contractor EO Engineer	Construction
Fencing mitigations: <ul style="list-style-type: none"> • Top 2 strands must be smooth wire • Routinely retention loose wires • Minimum 30 cm between wires • Place markers on fences 	EPC Contractor EO Engineer	Construction
As far as possible power cables within the Development Footprint should be thoroughly insulated and preferably buried.	EPC Contractor EO Engineer	Construction
Any exposed parts pf the power lines must be covered (insulated) to reduce electrocution risk	EPC Contractor EO Engineer	Construction

Mitigation: Action/control	Responsibility	Timeframe
During construction any fauna directly threatened by the construction activities should be removed to a safe location by a suitably qualified person.	EPC Contractor Specialist – ecologist/ trained person	Construction
The illegal collection, hunting or harvesting of any plants or animals at the site should be strictly forbidden.	EPC Contractor	Construction
Employees should be trained (e.g., during toolbox talks) that poisonous animals should not be killed and if encountered the ECO/ EO should be informed.	Project Developer EPC Contractor ECO EO	Duration of contract
Make use of Low-Pressure Sodium lighting or other types of low impact lighting.	EPC Contractor	Construction
All construction vehicles on site should adhere to a low-speed limit (40km/h) to avoid collisions with susceptible species such as snakes and tortoises.	EPC Contractor	Construction
Construction vehicles limited to the Development Footprint on the Project Site (no movement outside of the demarcated footprint).	EPC Contractor	Construction
If any parts of the facility are to be fenced, then no electrified strands should be placed within 30cm of the ground as some species such as tortoises are susceptible to electrocution from electric fences as they do not move away when electrocuted but rather adopt defensive behaviour and are killed by repeated shocks.	EPC Contractor	Duration of contract
All areas to be developed must be walked through prior to any activity to ensure no nests or avifauna species are found in the area. Should any SCC be found and not move out of the area, or their nest be found in the area a suitably qualified specialist must be consulted to advise on the correct actions to be taken.	Project manager/Site manager EO Specialist – avifaunal	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.	EPC Contractor	Construction
The EO should provide 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.	EPC Contractor EO	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 fauna and avifauna. » Limited impacts on faunal 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 9: Minimise impacts on heritage sites during the construction of the Project

Project component/s	<ul style="list-style-type: none"> » Excavations of solar panel mounting structure foundations. » Excavations of trenches for the installation of cabling and infrastructure. » Excavation of substation foundations.
Potential Impact	<ul style="list-style-type: none"> » Loss of archaeological artefacts. » Loss of fossil resources. » Destruction of on heritage sites. » Destruction of graves or burial sites. » Loss of resources going unnoticed. » Destruction of resources
Activity/risk source	<ul style="list-style-type: none"> » All earthworks.
Mitigation: Target/Objective	<ul style="list-style-type: none"> » To facilitate the likelihood of identifying heritage resources and ensure appropriate actions in terms of the relevant legislation

Mitigation: Action/control	Responsibility	Timeframe
<p>A Chance Fossil Find Procedure must be implemented for the duration of construction activities:</p> <ul style="list-style-type: none"> » One person in the staff must be identified and appointed as responsible for the implementation of the protocol in instances of accidental fossil discovery and must report to the ECO or site agent. If the ECO or site agent is not present on site, then the responsible person on site should follow the protocol correctly in order to not jeopardize the conservation and well-being of the fossil material. » Once a workman notices possible fossil material, he/she should report this to the ECO or site agent. Procedure to follow if it is likely that the material identified is a fossil: » The ECO must ensure that all work ceases immediately in the vicinity of the area where the fossil or fossils have been found. » The ECO must inform SAHRA of the find immediately. This information must include photographs of the findings and GPS co-ordinates. » The ECO must compile a Preliminary Report and fill in the attached Fossil Discoveries: Preliminary Record Form within 24 hours without removing the fossil from its original position. The Preliminary Report records basic information about the find including: <ul style="list-style-type: none"> * The date. * A description of the discovery. * A description of the fossil and its extent (e.g., position and depth of find). * Where and how the find has been stored. * Photographs to accompany the preliminary report. * A scale must be used. * Photos of location from several angles. * Photos of vertical section should be provided. 	<p>EPC Contractor Project Developer ECO Heritage Specialist</p>	<p>Construction</p>

Mitigation: Action/control	Responsibility	Timeframe
<ul style="list-style-type: none"> * Digital images of hole showing vertical section (side). * Digital images of fossil or fossils. » Upon receipt of this Preliminary Report, SAHRA will inform the ECO whether or not a rescue excavation or rescue collection by a palaeontologist is necessary. » Exposed finds must be stabilised where they are unstable and the site capped, e.g. with a plastic sheet or sand bags. This protection should allow for the later excavation of the finds with due scientific care and diligence. SAHRA can advise on the most appropriate method for stabilisation. » If the find cannot be stabilised, the fossil may be collect with extreme care by the ECO or the site agent and put aside and protected until SAHRA advises on further action. Finds collected in this way must be safely and securely stored in tissue paper and an appropriate box. Care must be taken to remove the all fossil material and any breakage of fossil material must be avoided at all costs. » No work may continue in the vicinity of the find (the buffer will be determined by the type of heritage that is identified) until SAHRA has indicated, in writing, that it is appropriate to proceed. » A detailed "walk down" of the final approved Solar PV Energy Facility Development Footprint and the grid connection corridor will be required before construction commences. » Any heritage features of significance identified during this walk down will require formal mitigation (i.e., permitting where required) or where possible a slight change in design could accommodate such resources. » A Heritage management plan (HMP) for the heritage resources needs to be compiled and approved for implementation during construction and operations where heritage features of significance are identified. 		
<ul style="list-style-type: none"> » Workmen and foremen need to be trained in the procedure to follow in instances of accidental discovery of fossil material, in a similar way to the Health and Safety protocol. A brief introduction to the process to follow in the event of possible accidental discovery of fossils should be conducted by the designated Environmental Control Officer (ECO) for the project, or the foreman or site agent in the absence of the ECO It is recommended that copies of the attached poster and procedure are printed out and displayed at the site office so that workmen may familiarise themselves with them and are thereby prepared in the event that accidental discovery of fossil material takes place. 	<p>EPC Contractor Project Developer ECO Heritage Specialist</p>	<p>Construction</p>

Performance Indicator	<ul style="list-style-type: none"> » Reporting on possible heritage resource finds. » Heritage resources identified and protected or permitted. » Dealing with all heritage finds as per the legislative requirements.
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	» Ensure compliance with relevant legislation and recommendations from SAHRA under Section 36 and 38 of NHRA
Monitoring and Reporting	» Ensure staff are aware of heritage resources and the procedure to follow when found. » EO to conduct inspections of open excavations.

OBJECTIVE 10: Minimisation of visual impacts associated with construction

During construction heavy vehicles, components, cranes, equipment, and construction crews will frequent the Project Site and may cause, at the very least, a visual nuisance to landowners and residents in the area as well as road users.

Project component/s	» PV arrays; » Substation; » BESS; » Access roads; and » Associated infrastructure.
Potential Impact	» Visual impact of general construction activities, and the potential scarring of the landscape due to vegetation clearing and resulting erosion.
Activity/risk source	» The viewing of the above mentioned by observers on or near the site.
Mitigation: Target/Objective	» Minimal visual intrusion by construction activities and intact vegetation cover outside of immediate construction work areas.

Mitigation: Action/control	Responsibility	Timeframe
Ensure that vegetation cover adjacent to the Development Footprint (if present) is not unnecessarily removed during the construction phase, where possible.	EPC Contractor	Construction
Reduce the construction phase timeframes through careful logistical planning and productive implementation of resources wherever possible.	EPC Contractor	Construction
Restrict the activities and movement of construction workers and vehicles to the immediate construction site and existing access roads.	EPC Contractor	Construction
Ensure that rubble, litter, and disused construction materials are appropriately stored (if not removed daily) and then disposed regularly at licensed waste facilities.	EPC Contractor	Construction
Reduce and control construction dust through the use of approved dust suppression techniques as and when required (i.e. whenever dust becomes apparent).	EPC Contractor	Construction
Restrict construction activities to daylight hours in order to negate or reduce the visual impacts associated with lighting, where possible.	EPC Contractor	Construction
Rehabilitate all disturbed areas (if present/if required) immediately after the completion of construction works.	EPC Contractor	Construction

Performance Indicator	Vegetation cover on and in the vicinity of the Project Site is intact (i.e. full cover as per natural vegetation present within the environment) with no evidence of degradation or erosion.
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Monitoring	<p>Monitoring of vegetation clearing during construction (by contractor as part of construction contract).</p> <p>Monitoring of rehabilitated areas quarterly for at least a year following the end of construction (by contractor as part of construction contract).</p>
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OBJECTIVE 11: Appropriate handling and management of waste

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

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

Project Component/s	<ul style="list-style-type: none"> » PV arrays; » Substation; » BESS; » Access roads; and » Associated infrastructure.
Potential Impact	<ul style="list-style-type: none"> » Excessive waste generation due to the inefficient use of resources » Un-neat and visibly unappealing Project Site due to mismanagement of waste i.e. Litter » Contamination of the soil or water resource through poor waste management practices. » Rodent infestation » Odour
Activity/Risk Source	<ul style="list-style-type: none"> » Packaging materials for modules etc. » Hydrocarbon use and storage. » Spoil material from excavation, earthworks and site preparation. » Improper management of the waste management yard » Improper and irregular cleaning of chemical toilet and disposal of wastewater
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.

Mitigation: Action/Control	Responsibility	Timeframe
Implement an integrated waste management approach that is based on waste minimisation and incorporates reduction, recycling, re-use and disposal where appropriate. Where solid waste is disposed of, such disposal shall only occur at an appropriately licensed landfill.	EPC Contractor EO ECO	Construction

Mitigation: Action/Control	Responsibility	Timeframe
Construction method and materials must be carefully considered in view of waste reduction, re-use, and recycling opportunities. The waste management provided in Appendix I must be utilised.	EPC Contractor	Construction
Construction contractors must provide specific detailed waste management plans to deal with all waste streams.	EPC Contractor	Construction
Ensure that no waste stream generated by the Project is placed, dumped, or deposited on adjacent/surrounding properties.	EPC Contractor EO ECO	Construction
A waste management yard will be designated on-site for the temporary management of various waste streams generated on the Project Site. The location of the waste management yard will seek to minimise the potential for impact on the surrounding environment, including prevention of contaminated runoff, seepage, and vermin control. This location of the waste management yard will be included on the construction site layout plan.	EPC Contractor Waste Management Contractor	Construction
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.).	EPC Contractor EO Waste Management Contractor	Construction
Storage and disposal of waste must be done in accordance with relevant legislative requirements, including the use of licensed contractors.	EPC Contractor EO Waste Management Contractor	Construction
Uncontaminated waste must be removed at least weekly for disposal, if feasible; other wastes must be removed for recycling/ disposal at an appropriate frequency.	EPC Contractor EO	Construction
Hydrocarbon waste must be contained and stored in sealed containers within an appropriately bunded area and clearly labelled. This must be regularly removed and recycled (where possible) or disposed of at an appropriately licensed landfill site.	EPC Contractor EO Waste Management Contractor	Construction
Mobile chemical toilets will be used, and these will be emptied and maintained regularly.	EPC Contractor EO	Construction
All liquid wastes must be contained in appropriately sealed container within the Development Footprint of the Project and be disposed of at a designated waste management facility.	EPC Contractor EO Waste Management Contractor	Construction
Documentation (waste manifest) must be maintained detailing the quantity, nature, and fate of any regulated waste. Waste disposal records must be available for review at any time.	EPC Contractor EO Waste Management Contractor	Construction
Regularly serviced chemical toilet facilities and/or septic tank must be used to ensure appropriate control of sewage.	EPC Contractor EO	Construction
Daily inspection of all chemical toilets and septic tanks must be performed by environmental representatives on site.	EPC Contractor EO	Construction
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.	EPC Contractor EO	Construction

Mitigation: Action/Control	Responsibility	Timeframe
Under no circumstances may waste be burnt or buried on site.	EPC Contractor EO	Construction
Litter generated by the construction crew must be collected in rubbish bins and disposed of at an appropriate frequency, at registered waste disposal sites.	EPC Contractor EO	Construction
Upon the completion of construction, the area must be cleared of potentially polluting materials (including chemical toilets). Spoil stockpiles must also be removed and appropriately disposed of, or the materials re-used for an appropriate purpose.	EPC Contractor EO	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. » Provision of all appropriate waste manifests for all waste streams.
Monitoring	<ul style="list-style-type: none"> » Observation and supervision of waste management practices throughout construction phase. » Waste collection will be monitored on a regular basis. » Waste documentation completed. » Proof of disposal of sewage at an appropriate wastewater treatment works. » A complaints register will be maintained, in which any complaints from the community will be logged. Complaints will be investigated and, if appropriate, acted upon. » An incident reporting system will be used to record non-conformances to the EA, EMPr, management plans and MS.

OBJECTIVE 12: 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"> » PV arrays; » Substation; » BESS; » Access roads; and » Associated infrastructure.
Potential Impact	<ul style="list-style-type: none"> » Water Pollution » Contaminated soil/ soil pollution » Contaminated waste products Human health » Faunal health
Activity/Risk Source	<ul style="list-style-type: none"> » Vehicles associated with site preparation and earthworks. » Construction activities of the Project. » 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. » Washing of vehicles at the wash bays » Cleaning or spraying down of workshop and laydown areas

	» Concrete mixing/bathing.
Mitigation: Target/Objective	<ul style="list-style-type: none"> » To ensure that the storage and handling of chemicals and hydrocarbons on-site does not cause pollution to the environment or harm to persons. » To ensure that the storage and maintenance of machinery on-site does not cause pollution of the environment or harm to persons. » Prevent and contain hydrocarbon leaks. » Undertake proper waste management. » Store hazardous chemicals safely in a bunded area.

Mitigation: Action/Control	Responsibility	Timeframe
Implement an emergency preparedness plan during the construction phase.	EPC Contractor EO ECO	Construction
Any liquids stored on site, including fuels and lubricants, must be stored in accordance with applicable legislation.	EPC Contractor	Construction
Spill kits must be made available on-site for the clean-up of spills and leaks of contaminants. These must be maintained regularly.	EPC Contractor EO ECO	Construction
Vehicles and equipment must be parked on an impermeable surface when not in use or overnight. If this is not possible all vehicles, machinery and equipment needs to be fitted with a drip tray and plastic sheeting filled with absorbent material.	EPC Contractor EO ECO	Construction
<p>Establish an appropriate Hazardous Stores and fuel storage area which is in accordance with the Hazardous Substance Amendment Act, No. 53 of 1992. This must include but not be limited to:</p> <ul style="list-style-type: none"> » Designated area; » All applicable safety signage; » Firefighting equipment; » Enclosed by an impermeable bund as per the requirements of the relevant standards and any relevant by-laws; » Protected from the elements, » Lockable; » Ventilated; and » Has adequate capacity to contain 110% of the largest container contents. 	EPC Contractor EO ECO	Construction
The storage of flammable and combustible liquids such as oils must be stored in compliance with Material Safety Data Sheets (MSDS) files.	EPC Contractor EO ECO	Construction
Corrective action must be undertaken immediately if a complaint is made, or potential/actual leak or spill of polluting substance identified. This includes stopping the contaminant from further escaping, cleaning up the affected environment as much as practically possible and implementing preventive measures. Where required, a NEMA Section 30 report must be submitted to DFFE within 14 days of the incident.	EPC Contractor EO ECO	Construction
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.	EPC Contractor EO ECO	Construction

Mitigation: Action/Control	Responsibility	Timeframe
Spilled concrete must be cleaned up as soon as possible and disposed of at a suitably licensed waste disposal site.	EPC Contractor EO ECO	Construction
Accidental spillage of potentially contaminating liquids and solids must be cleaned up immediately in line with procedures by trained staff with the appropriate equipment.	EPC Contractor EO ECO	Construction
Any contaminated/polluted soil removed from the site must be disposed of at a licensed hazardous waste disposal facility.	EPC Contractor EO ECO	Construction
All machinery and equipment must be inspected regularly for faults and possible leaks,	EPC Contractor EO ECO	Construction
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.	EPC Contractor EO ECO	Construction
Construction machinery must be stored in an appropriately sealed area or drip trays must be placed underneath stationary vehicles.	EPC Contractor EO ECO	Construction
Any storage and disposal permits/approvals which may be required must be obtained, and the conditions attached to such permits and approvals will be compiled with.	Project Developer EPC Contractor ECO	Pre Construction and Construction
Transport of all hazardous substances must be in accordance with the relevant legislation and regulations.	Waste Management Contractor ECO EO EPC Contractor	Construction
Precautions must be in place to limit the possibility of oil and other toxic liquids from entering the soil or clean stormwater system.	ECO EO EPC Contractor Engineer	Construction
As much material must be prefabricated and then transported to site to avoid the risks of contamination associated with mixing, pouring and the storage of chemicals and compounds on site.	EPC Contractor	Construction
Minimise fuels and chemicals stored on site.	Contractor	Construction
Implement a contingency plan to handle spills, so that environmental damage is avoided.	Contractor	Construction
Drip trays must be used during all fuel/chemical dispensing and 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 hazardous material spills outside of designated storage areas. » No water or soil contamination by spills. » Safe storage of hazardous chemicals. » Proper waste management.
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Monitoring

- » Observation and supervision of chemical storage and handling practices and vehicle maintenance throughout construction phase.
- » A complaints register must be maintained, in which any complaints from the community will be logged.
- » An incident reporting system must be used to record non-conformances to the EA, EMPr, management plans and MS.
- » On-going visual assessment to detect polluted areas and the application of clean-up and preventative procedures.
- » Monitor hydrocarbon spills from vehicles and machinery during construction continuously and record volume and nature of spill, location and clean-up actions.
- » Monitor maintenance of drains and intercept drains weekly.
- » Analyse soil samples for pollution in areas of known spills or where a breach of containment is evident when it occurs.
- » Records of accidental spills and clean-up procedures and the results thereof must be audited on an annual basis by the ECO.
- » Records of all incidents that caused chemical pollution must be kept and a summary of the results must be reported to management annually.

OBJECTIVE 13: Traffic management and transportation of equipment and materials to site

The construction and decommissioning phases of the project will be the most significant in terms of traffic impacts resulting from the transport of equipment (including solar components) and materials and construction crews to the project site and the return of the vehicles after delivery of materials. Potential impacts associated with transportation and access relate mostly to works within the site boundary (i.e., the solar facility and ancillary infrastructure) and the external road network. This section should be read in conjunction with the Traffic and Transportation Plan attached as **Appendix F**.

Project component/s	<ul style="list-style-type: none"> » PV arrays; » Substation; » BESS; » Access roads; and » Associated infrastructure.
Potential Impact	<ul style="list-style-type: none"> » Traffic congestion, particularly on narrow roads or on road passes where overtaking is not permitted. » Road accidents. » Deterioration of road conditions
Activity/risk source	<ul style="list-style-type: none"> » Construction vehicle movement. » Mobile construction equipment movement on-site. » Speeding on local roads.
Mitigation: Target/Objective	<ul style="list-style-type: none"> » Minimise the impact of traffic associated with the construction of the Project on the local traffic volume, existing infrastructure, property owners, animals, and road users. » To minimise the potential for negative interaction between pedestrians or sensitive users and traffic associated with the construction of the Project. » 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
Develop and implement a detailed MS for the implementation of the traffic and transportation management plan (refer to Appendix F).	Contractor(s), (Transportation sub-contractor) EO ECO	Construction
Heavy vehicles travelling on secondary roads should adhere to low-speed limits to minimise noise and dust pollution.	Contractor(s), (Transportation sub-contractor)	Construction
Where possible provide public transportation service for workers in order to reduce congestion on roads.	Contractor	Construction
Transportation contractors must adhere to the road rules and regulations.	Contractor	Construction
A designated access (or accesses) to the proposed Project Site must be created to ensure safe entry and exit.	Contractor	Construction
Utilise only designated access routes & entrance/exits from the site.	Contractor	Construction

Mitigation: Action/control	Responsibility	Timeframe
Implement appropriate signage & road safety measures at entrance/exit to the site and on site.	Contractor	Construction
The delivery of solar components to the site must be staggered and trips must be scheduled to occur outside of peak traffic periods, where possible.	Contractor	Construction
The use of mobile batching plants and quarries in close proximity to the site must be considered as this would decrease the impact on the surrounding road network.	Contractor	Construction
Regular maintenance of gravel roads by the EPC Contractor during the construction and decommissioning phases.	Contractor	Construction
Dust suppression of gravel roads during the construction and decommissioning phases, as required.	Contractor	Construction
Any low hanging overhead lines (lower than 5.1 m) e.g., Eskom and Telkom lines, along the proposed routes will have to be moved to accommodate the abnormal load vehicles.	Contractor	Construction

Performance Indicator	<ul style="list-style-type: none"> » No traffic incidents involving Project personnel or appointed contractors. » Appropriate signage in place. » No complaints resulting from traffic congestion, delays or driver negligence associated with construction of the Project.
Monitoring	<ul style="list-style-type: none"> » Visual monitoring of traffic control measures to ensure they are effective. » A complaints register will be maintained, in which any complaints from the community will be logged. Complaints will be investigated and, if appropriate, acted upon. » An incident reporting system will be used to record non-conformances to the EA, EMPr, management plans and MS.

OBJECTIVE 14: Ensure appropriate rehabilitation of disturbed areas such that residual environmental impacts are remediated or curtailed

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

Project component/s	<ul style="list-style-type: none"> » PV arrays; » Substation; » BESS; » Access roads; and » Associated infrastructure.
Potential Impact	<ul style="list-style-type: none"> » Undermining of the Environmental integrity of the Project Site resulting in reduced visual aesthetics, erosion, compromised land capability and the requirement for on-going management intervention.
Activity/risk source	<ul style="list-style-type: none"> » Site preparation and earthworks. » Excavation of foundations and trenches. » Construction of laydown areas. » Construction of access roads/tracks.

	» Other disturbed areas/footprints.
Mitigation: Target/Objective	<ul style="list-style-type: none"> » To ensure and encourage site rehabilitation of disturbed areas. » To ensure that the Project 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
A site rehabilitation programme should be compiled and implemented (refer to Appendix D).	EPC Contractor Specialist – ecologist & agriculturalist EO	Construction
Following construction, rehabilitation of all disturbed areas that will not be utilised during the operations of the Facility will be undertaken.	Contractor EO	Rehabilitation
Rehabilitate of disturbed areas should be undertaken as soon as reasonably practicable after construction works have been closed out.	Contractor EO	Rehabilitation
Where required, artificial rehabilitation (e.g. re-seeding with collected or commercial indigenous seed mixes) may be applied in order to speed up the rehabilitation process if deemed necessary by the ECO.	Contractor EO	
If natural re-vegetation is unsuccessful, seeding and planting of the area will need to be implemented	Contractor EO	Rehabilitation
All temporary facilities, equipment and waste materials must be removed from the Project Site and appropriately disposed of.	Contractor	Rehabilitation
Re-vegetated areas may have to be protected from wind erosion and maintained until an acceptable plant cover has been achieved.	Contractor	Rehabilitation
On-going alien plant monitoring and removal should be undertaken on all areas of natural vegetation on an annual basis.	Contractor	Life of Project

Performance Indicator	<ul style="list-style-type: none"> » All facilities that have been constructed or erected for only construction phase purposes including but not limited to the construction camp and working areas, must be cleared of equipment » Topsoil replaced on all areas and stabilised. » Disturbed areas must be rehabilitated, and acceptable plant cover achieved on rehabilitated sites.
Monitoring and Reporting	<ul style="list-style-type: none"> » On-going inspection of rehabilitated areas need to take place during the operational lifespan of the Project in order to determine the effectiveness of the rehabilitation measures implemented. » On-going monitoring of alien invasive plant species on site and annual removal where needed. » An incident reporting system must be used to record non-conformances to the EA, EMPr, management plans and MS.

7.2. Detailing Method Statements

OBJECTIVE 15: 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 be mitigated and managed for the duration of the contract, and how specifications within this EA, EMPr and management plans will be met. The Contractor will be required to describe how specific requirements will be achieved through the submission of written Method Statements (MS) to the Site Manager/Project Manager and ECO.

A MS 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 to use to undertake the activity. The MS needs to be drafted in such a manner as to allow the Site Manager to assess whether the Contractor's proposal is in accordance with the specifications and/or will produce results in accordance with the specifications". The MS must cover applicable details with regard to:

- » Details of the 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
- » Any other information deemed necessary by the Site Manager

MS 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 MS; 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 construction site camp layout plan indicating all of these).
- » Preparation of the construction 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).
- » Stipulate the stormwater management.
- » 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 the 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 rivers, streams or existing drainage systems.
 - * Should grey water (i.e. water from basins, showers, baths, kitchen sinks etc.) need to be disposed of, link into existing facilities or sewerage systems where possible. Where no facilities are available, grey water runoff must be controlled to ensure there is no unacceptable seepage 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, borrow pits 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 the 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.
- » Access roads and the protocol for when roads are in use.
- » Site Access.

The Contractor may not commence with the activity covered by the MS until it has been reviewed by the Site Manager, except in the case of emergency activities and then only with the consent of the Site Manager. Approval of the MS will not absolve the Contractor from their obligations or responsibilities in terms of their contract.

Failure to submit a MS may result in suspension of the activity concerned until such time as a MS has been submitted and approved.

7.3. Awareness and Competence: Construction Phase of the Daisy Solar PV Facility

OBJECTIVE 16: 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 Contractors are aware of the responsibilities in terms of the relevant environmental legislation and the contents of the EA, EMPr and management plans. 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 MS are to be clearly explained to all plant operators and general workers. All staff acting in a supervisory capacity is to have copies of the relevant MS and be aware of the content thereof.
- » Ensuring that a copy of the EMPr is readily available on-site, and that all senior site staff is aware of the location and have access to the document. Senior site staff will be familiar with the requirements of the EMPr and the environmental specifications as they apply to the construction of the Project.
- » 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, EA and Development Permits and sign a declaration/ acknowledgement that they are aware and familiar with the contents and requirements of the EMPr and that they will conduct work in such a manner as to ensure compliance with the requirements of the EMPr.
- » Contractors and main sub-contractors should have basic training in the identification of archaeological sites/objects, and protected flora and fauna that may be encountered on the Project Site.
- » Awareness of any other environmental matters, which are deemed to be necessary by the ECO.
- » Ensuring that employee information posters, outlining the environmental "do's" and "don'ts" (as per the environmental awareness training course) are erected at prominent locations throughout the site.

Therefore, prior to the commencement of construction activities on site and before any person commences with work on site thereafter, adequate environmental awareness and responsibility are to be appropriately presented to all staff present 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:

7.3.1 Environmental Awareness Training

Environmental Awareness Training must be undertaken by the EPC Contractor and must take the form of an on-site talk and demonstration by the EO before the commencement of site establishment and construction on site. The education/awareness programme should be aimed at all levels of management and construction workers within the contractor team. A record of attendance of this training must be maintained by the EO on site.

7.3.2 Induction Training

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 the developer's environmental policy and values, the function of the EA, EMPr, management plans 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.

7.3.3 Toolbox Talks

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

7.4. Monitoring Programme: Construction Phase of the Daisy Solar PV Facility

OBJECTIVE 17: 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. Monitoring during construction must be continuous for the duration of this period. The Project Manager must ensure that the monitoring is conducted and reported.

The aim of the monitoring and auditing process will be to monitor the implementation of the 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 in terms of the Environmental Authorisation, must be submitted to DFFE.

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.

7.4.1. Non-Conformance Reports

All supervisory staff including foremen, resident engineers, and the ECO must be provided with 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.

7.4.2. Incident Reports

According to Section 30 of National Environmental Management Act (NEMA), an "Incident" is defined as an unexpected sudden occurrence, including a major emission, fire or explosion leading to serious danger

to the public or potentially serious pollution of or detriment to the environment, whether immediate or delayed.

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 such information as is available to enable an initial evaluation of the incident, including:

- (a) the nature of the incident;
- (b) the substances involved and an estimation of the quantity released and their possible acute effect on persons and the environment and data needed to assess these effects;
- (c) initial measures taken to minimise impacts;
- (d) causes of the incident, whether direct or indirect, including equipment, technology, system, or management failure; and
- (e) measures taken and to be taken to avoid a recurrence of such incident.

7.4.3. Monitoring Reports

A monitoring report will be compiled by the ECO on a monthly basis (or as dictated by the conditions of the EA) and must be submitted to the NWDEDCT for their records. This report should include details of the activities undertaken in the reporting period, any non-conformances or incidents recorded, corrective action required, and details of those non-conformances or incidents which have been closed out, or any other aspect as per the Appendix 7 of the EIA Regulations (2014, as amended 2017). The EPC contractor must ensure that all waste manifests are provided to the ECO on a monthly basis in order to inform and update the DFFE regarding waste related activities.

7.4.4. Audit Report

The Project Developer must ensure that compliance with the conditions of the EA is audited by an independent auditor, and that the audit reports are submitted to the Director: Compliance Monitoring at the DFFE at intervals as dictated by the conditions of the EA. Such audits must be undertaken during both the construction and operation phases of the solar facility. The effectiveness of the mitigation measures and recommendations for amongst others the following: grievance incidents; waste management, alien and open space management, re-vegetation and rehabilitation, plant rescue and protection and traffic and transportation should be audited. The results must form part of the project monitoring and audit reports.

7.4.5. Final Audit Report

A final environmental audit report must be compiled by an independent external auditor and be submitted to DFFE upon completion of the construction and rehabilitation activities (within 30 days of completion of the construction phase. 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 8: MANAGEMENT PROGRAMME: OPERATION

Overall Goal: To ensure that the operation of the Project 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 Daisy Solar PV Facility in a way that:

- » Ensures that operation activities are properly managed in respect of environmental aspects and impacts.
- » Enables the Project's operational 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.
- » Minimises impacts on fauna using the site.

An environmental manager (EM) must be appointed during operation whose duty will be to ensure the implementation of the operational EMPr.

8.1. Objectives

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

OBJECTIVE 1: Securing the site and general maintenance during operation

Safety issues may arise with public access to Project Site (e.g., unauthorised entry to the site). Prevention and control measures to manage public access are therefore important.

General maintenance at the Daisy Solar PV Facility will be required during the operation of the Project. The maintenance required may also include the replacement of PV modules, if required during the operation lifetime of the Project.

Project component/s	<ul style="list-style-type: none"> » PV arrays; » Substation; » BESS; » Access roads; and » Associated infrastructure.
Potential Impact	<ul style="list-style-type: none"> » Security threat to neighbouring land owners.
Activities/risk sources	<ul style="list-style-type: none"> » Uncontrolled access to the solar facility and associated infrastructure. » Insufficient maintenance of the fence » Insufficient security service personnel present on site
Mitigation: Target/Objective	<ul style="list-style-type: none"> » To secure the site against unauthorised entry. » To protect members of the public/landowners/residents.

Mitigation: Action/control	Responsibility	Timeframe
General onsite maintenance of the Project during the operational phase must in no way impact or negatively affect the environment, and contractors or other service providers providing onsite maintenance must be made aware of the EA, EMPr, management plans and the content thereof.	O&M Operator	Operation phase
Secure access to the Project Site.	O&M Operator	Operation phase
Post information boards about public safety hazards and emergency contact information.	O&M Operator	Operation phase
Should there be a need for equipment/components to be replaced, during operations the following will apply: » Site access must be confirmed for the transportation of the required equipment/ components to the site. » Materials and solar structures 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 equipment/components, and disturbed areas appropriately rehabilitated. » Waste generated by the maintenance work must be treated in accordance with the Operational Waste Management MS. Waste materials will be sorted and stored on site until disposal is required. 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 following the replacement. » 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 Operator	Operation phase

Performance Indicator	» Site is secure and there is no unauthorised entry. » No members of the public/ landowners injured. » No complaints from landowners/ public.
Monitoring and Reporting	» Regular visual inspection of fence for signs of deterioration/forced access. » An incident reporting system must be used to record non-conformances to the EMPr. » A public complaints register must be developed and maintained on site. » Landowners should be consulted regularly.

OBJECTIVE 2: Protection of indigenous natural vegetation, fauna, and maintenance of rehabilitation

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

Project component/s	» PV arrays;
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	<ul style="list-style-type: none"> » Substation; » BESS; » Access roads; and » Associated infrastructure.
Potential Impact	<ul style="list-style-type: none"> » Disturbance to or loss of vegetation and/or habitat. » Alien plant invasion. » Environmental integrity of site undermined resulting in reduced visual aesthetics, erosion, compromised land capability and the requirement for on-going management intervention.
Activity/Risk Source	<ul style="list-style-type: none"> » Movement of employee vehicles within and around site.
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
Any potentially dangerous fauna such as snakes or fauna threatened by the maintenance and operational activities should be removed to a safe location.	O&M Operator	Operation phase
The collection, hunting or harvesting of any plants or animals at the Project Site should be strictly forbidden by anyone without the appropriate permits and permissions.	O&M Operator	Operation phase
Implement an animal removal plan to ensure safety of workers and fauna.	O&M Operator	Operation phase
Make use of Low-Pressure Sodium lighting or other types of low impact lighting.	O&M Operator	Operation phase
All vehicles accessing the site should adhere to a low-speed limit (40km/h max) to avoid collisions with susceptible species such as snakes and tortoises.	O&M Operator	Operation phase
All roads and other hardened surfaces should have runoff control features which redirect water flow and dissipate any energy in the water which may pose an erosion risk.	O&M Operator	Operation phase
Regular monitoring for erosion after construction to ensure that no erosion problems have developed as result of the disturbance must be undertaken, as per the Erosion Management and Rehabilitation Plans for the Project.	O&M Operator	Operation phase
Existing roads must be maintained to ensure limited erosion and impact on areas adjacent to roadways.	O&M Operator	Operation phase
Vehicle movements must be restricted to designated roadways.	O&M Operator	Operation phase
All erosion problems observed must be rectified as soon as possible, using the appropriate erosion control structures and revegetation techniques.	O&M Operator	Operation phase
Due to the disturbance at the site as well as the increased runoff generated by the hard infrastructure, alien plant species are likely to be a long-term problem at the site and a long-term control plan will need to be implemented.	O&M Operator	Operation phase
Annual site inspection for erosion with follow up remedial action where problems are identified.	Specialist	Annual monitoring until successful re-establishment of vegetation in an area

Mitigation: Action/Control	Responsibility	Timeframe
Regular monitoring for alien plants within the Development Footprint.	O&M Operator	Operation phase
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 and increase to problematic levels. Clearing methods must aim to keep disturbance to a minimum. The use of herbicides should be avoided as far as possible.	O&M Operator	Operation phase
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.	O&M Operator	Operation phase
All alien plant re-growth must be monitored and should these alien plants reoccur these plants should be re-eradicated. The scale of the development does however not warrant the use of a Landscape Architect and / or Landscape Contractor.	O&M Operator	Operation phase
In order to increase general faunal protection, the use of any pesticide in the Development Footprint should be prohibited.	O&M Operator	Operation phase
Vegetation control within the Development Footprint should be by manual clearing and herbicides should not be used except to control alien plants in the prescribed manner if necessary.	O&M Operator Specialist	Operation phase
The use of herbicides and other related horticultural chemicals should be carefully controlled and only applied by personnel adequately certified to apply pesticides and herbicides. It must be ensured that WHO Recommended Classification of Pesticides by Hazard Class 1a (extremely hazardous) or 1b (highly hazardous) are not purchased, stored, or used on site along with any other nationally or internationally similarly restricted/banned products.	O&M Operator	Operation phase
Fire breaks should be maintained, where appropriate and as discussed with the landowners. Access roads could also act as fire breaks.	O&M Operator Specialist	Duration of contract
There should be follow-up rehabilitation and revegetation of any remaining bare areas with indigenous vegetation types to the local area.	O&M Operator	Operation phase
Noise and disturbance on the site should be kept to a minimum during operation and maintenance activities.	O&M Operator	Operation phase

Performance Indicator	<ul style="list-style-type: none"> » No further disturbance to vegetation or terrestrial faunal habitats. » No erosion problems resulting from operational activities. » Low abundance of alien plants within Development Footprint. » Maintenance of a ground cover that resist erosion. » Continued improvement of rehabilitation efforts.
Monitoring	<ul style="list-style-type: none"> » Observation of vegetation on-site by EM. » Regular inspections to monitor plant regrowth/performance of rehabilitation efforts and weed infestation compared to natural/undisturbed areas. » Annual monitoring with records of alien species presence and clearing actions. » Annual monitoring with records of erosion problems and mitigation actions taken with photographs.

OBJECTIVE 3: Protection of avifauna

Project component/s	<ul style="list-style-type: none"> » PV arrays; » Substation; » BESS; » Access roads; and » Associated infrastructure.
Potential Impact	<ul style="list-style-type: none"> » Disturbance to or loss of avifaunal species as a result of collision with Project components. » Destruction of habitat. » Displacement of avifaunal species. » Electrocution.
Activity/risk source	<ul style="list-style-type: none"> » Operations of the Project » Maintenance activities.
Mitigation: Target/Objective	<ul style="list-style-type: none"> » More accurately determine the impact of the operating Project on collision-prone Red Data species.

Performance Indicator	<ul style="list-style-type: none"> » Minimal additional disturbance to avifaunal populations on the Project Site. » Continued improvement of avifaunal 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 from Project infrastructure. » Monitoring of Project infrastructure and reporting where fatalities do occur.

OBJECTIVE 5: Minimisation of visual impact

The mitigation of secondary visual impacts, such as security and functional lighting, etc. may be possible and should be implemented and maintained on an on-going basis.

Project component/s	<ul style="list-style-type: none"> » PV arrays; » Substation; » BESS; » Access roads; and » Associated infrastructure.
Potential Impact	<ul style="list-style-type: none"> » Enhanced visual intrusion. » Visual impact of the Project degradation and vegetation rehabilitation failure.
Activity/risk source	<ul style="list-style-type: none"> » Lighting of the Project Site for safety and security purpose.
Mitigation: Target/Objective	<ul style="list-style-type: none"> » To minimise the potential for visual impact. » Well maintained and neat facility.

Mitigation: Action/control	Responsibility	Timeframe
Maintain the general appearance of the facility.	Project Developer / operator	Throughout the operation phase.

Mitigation: Action/control	Responsibility	Timeframe
Maintain roads and servitudes to forego erosion and to suppress dust.	Project Developer / operator	Throughout the operation phase.
Monitor rehabilitated areas and implement remedial action as and when required.	Project Developer / operator	Throughout the operation phase.
Investigate and implement (should it be required) the potential to screen visual impacts at affected receptor sites.	Project Developer / operator	Throughout the operation phase.

Performance Indicator	» Well maintained and neat facility with intact vegetation in areas rehabilitated.
Monitoring and Reporting	» Monitoring of the Project Site on an ongoing basis by the operator.

OBJECTIVE 6: Ensure appropriate operation and maintenance of the battery energy storage system (BESS)

Project Component/s	» Battery Energy Storage System.
Potential Impact	» Fire and safety risks » Soils pollution » Water resources pollution
Activities/Risk Sources	» Inappropriate operation and maintenance of BESS.
Mitigation: Target/Objective	» To avoid and or minimise the potential risk of associated with the operation and maintenance of the BESS.

Mitigation: Action/Control	Responsibility	Timeframe
Compile (and adhere to) a procedure for the safe handling of battery cells	O&M Contractor	Operation
Ensure that battery supplier user guides, safety specifications and MSDS are filed on site at all times.	O&M Contractor	Operation
Operate, maintain and monitor the BESS as per supplier specifications.	O&M Contractor	Operation
Compile method statements for approval by the Technical/SHEQ Manager for battery cell, electrolyte, and battery cell/ container replacement. Maintain MS on site.	O&M Contractor	Operation
Develop, implement, and maintain the emergency response plan for implementation in the event of a spill or leakage.	O&M Contractor	Operation
Batteries must be strictly maintained by the supplier or suitably qualified persons for the duration of the project life cycle. No unauthorised personnel should be allowed to maintain the BESS.	O&M Contractor	Operation
Ensure that all maintenance contractors/ staff are familiar with the supplier's specifications.	O&M Contractor	Operation
Provide signage on site specifying the types of batteries in use and the risk of exposure to hazardous material and electric shock.	O&M Contractor	Operation

Mitigation: Action/Control	Responsibility	Timeframe
Provide signage on site specifying how electrical and chemical fires must be dealt with by first responders, and the potential risks to first responders (e.g. toxic fumes). Provide suitable firefighting equipment on site.	O&M Contractor	Operation
Lithium-ion batteries must have battery management systems (containment, automatic alarms and shut-off systems) to monitor and protect cells from overcharging or damaging conditions.	O&M Contractor	Operation
Maintain strict access control to the battery storage area.	O&M Contractor	Operation
Undertake regular visual checks on BESS equipment to identify signs of damage or leaks.	O&M Contractor	Operation
Spill kits must be made available to address any incidents associated with the flow of chemicals from the batteries into the surrounding environment.	O&M Contractor	Operation
Any spills must be cleaned up immediately and contaminated absorbents and materials or soil disposed of at a licensed hazardous waste disposal facility.	O&M Contractor	Operation

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

OBJECTIVE 7: Appropriate management of stormwater and erosion control

Project component/s	<ul style="list-style-type: none"> » PV arrays; » Substation; » BESS; » Access roads; and » Associated infrastructure.
Potential Impact	<ul style="list-style-type: none"> » Erosion and soil loss. » Increased runoff. » Downstream sedimentation.
Activities/risk sources	<ul style="list-style-type: none"> » Disturbed areas that were not appropriately rehabilitated » Rainfall and wind erosion of disturbed areas. » Concentrated discharge of water from Project Site. » Stormwater run-off from sealed surfaces.
Mitigation: Target/Objective	<ul style="list-style-type: none"> » To minimise the erosion of soil from site during operation. » To minimise damage to vegetation by erosion or deposition. » To retain all topsoil with a stable soil surface

Mitigation: Action/control	Responsibility	Timeframe
Any erosion problems observed along access roads, or any hardened/engineered surface should be rectified immediately and monitored thereafter to ensure that they do not re-occur	O&M Operator	Operation phase
All denuded areas, affected by the development, that have not been rehabilitated should be re-vegetated with locally occurring species, to bind the soil and limit erosion potential where applicable.	O&M Operator	Operation phase
Any stormwater within the site must be handled in a suitable manner as per the management measures in stormwater management plan.	O&M Operator	Operation phase
Stormwater from hardstand areas, buildings and the substation must be managed using appropriate channels and swales when located within steep areas.	O&M Operator	Operation phase
No stormwater runoff must be allowed to discharge directly into the watercourses. The runoff should rather be dissipated over a broad area covered by natural vegetation or managed using appropriate channels and swales when located within steep embankments.	O&M Operator	Operation phase
Stormwater run-off infrastructure must be maintained to mitigate both the flow and water quality impacts of any stormwater leaving the Solar PV Facility site.	O&M Operator	Operation phase

Performance Indicator	<ul style="list-style-type: none"> » Minimal level of soil erosion around site. » Minimal level of soil degradation. » No activity outside demarcated areas. » Progressive return of disturbed and rehabilitated areas to the desired end state. » No indications of visible topsoil loss.
Monitoring and Reporting	<ul style="list-style-type: none"> » Continual inspections of the site by the Environmental Manager. » Reporting of ineffective sediment control systems and rectification as soon as possible. » If soil loss is suspected, acceleration of soil conservation and rehabilitation measures must be implemented.

OBJECTIVE 8: Appropriate handling and management of hazardous substances and waste

The operation of the Project will involve the generation of limited waste products. The main waste streams/products expected to be generated by the operational activities includes general solid waste and hazardous waste.

Project component/s	<ul style="list-style-type: none"> » PV arrays; » Substation; » BESS; » Access roads; and » Associated infrastructure.
Potential Impact	<ul style="list-style-type: none"> » Inefficient use of resources resulting in excessive waste generation. » soil contamination

	<ul style="list-style-type: none"> » Water pollution » Vermin infestation » Odour.
Activity/risk source	<ul style="list-style-type: none"> » Transformers and switchgear – substation. » Fuel and oil storage. » Improper waste management activities – including storage and disposal
Mitigation: Target/Objective	<ul style="list-style-type: none"> » To comply with waste management legislation. » To minimise production of waste. » To ensure appropriate storage and disposal of waste. » To avoid environmental harm from waste disposal.

Mitigation: Action/control	Responsibility	Timeframe
Hazardous substances must be stored in sealed containers within a clearly demarcated and designated area.	O&M Operator	Operation phase
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 Operator	Operation phase
Care must be taken to ensure that spillage of oils and other hazardous substances are limited during maintenance and operational work. Handling of these materials should take place within an appropriately sealed and bunded area. Should any accidental spillage take place, it must be cleaned up according to specified standards regarding bioremediation.	O&M Operator	Operation and maintenance
Waste handling, collection and disposal operations must be managed and controlled by a waste management contractor.	O&M Operator / waste management contractor	Operation phase
Used oils and chemicals: <ul style="list-style-type: none"> » Where these cannot be recycled, 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 Operator	Operation phase
General waste must be recycled where possible or disposed of at an appropriately licensed landfill.	O&M Operator	Operation phase
Spill kits must be made available on-site for the clean-up of spills and leaks of contaminants.	O&M Operator	Operation and maintenance
Hazardous waste (including hydrocarbons) and general waste must be stored and disposed of separately.	O&M Operator	Operation phase
No waste may be burned or buried on site.	O&M Operator	Operation phase

Performance Indicator	<ul style="list-style-type: none"> » No complaints received regarding waste on site or illegal dumping. » Internal site audits identifying that waste segregation, recycling and reuse is occurring appropriately. » Provision of all appropriate waste manifests. » No contamination of soil. » No pollution of water resources.
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Monitoring and Reporting	<ul style="list-style-type: none"> » Waste collection must be monitored internally on a regular basis. » Waste documentation must be completed and made available for inspection on request. » An incidents/complaints register must be maintained, in which any complaints from the community must be logged. Complaints must be investigated and, if appropriate, acted upon. » Regular reports on exact quantities of all waste streams exiting the site must be compiled by the waste management contractor and monitored by the environmental manager. All appropriate waste disposal certificates must accompany the monthly reports.
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OBJECTIVE 9: Maximise benefits and opportunities for local communities associated with the operation of the solar facility

Project component/s	» Solar facility.
Potential Impact	» The opportunities and benefits associated with the creation of local employment and business should be maximised as far as possible.
Activity/risk source	» During the operation phase of the Project permanent employment opportunities will be created.
Mitigation: Target/Objective	» Create medium- to long-term full time employment opportunities for locals.

Mitigation: Action/control	Responsibility	Timeframe
The Project Developer should make effort to use locally sourced inputs where feasible in order to maximize the benefit to the local economy.	O&M Operator	Operation phase
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.	O&M Operator	Operation phase
Where feasible, effort must be made to employ locally in order to create maximum benefit for the communities.	O&M Operator	Operation phase

Performance Indicator	<ul style="list-style-type: none"> » Maximum amount of semi and unskilled labour locally sourced where possible. » Local suppliers and SMMEs contracted where possible.
Monitoring and Reporting	» Indicators listed above must be met for the operation phase.

OBJECTIVE 10: Implement an appropriate fire management plan during the operation phase

The vegetation on the site may be at risk of fire, especially during drought conditions experienced in the area. The increased presence of people on the Project Site could increase the risk of veld fires, particularly in the dry season.

Project Component/s	» PV arrays;
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	<ul style="list-style-type: none"> » Substation; » BESS; » Access roads; and » Associated infrastructure.
Potential Impact	<ul style="list-style-type: none"> » Personal safety risk to local farmers and communities, and their homes, crops, livestock and farm infrastructure, such as gates and fences. » Risk to the integrity of the Project infrastructure and personnel working on site.
Activities/Risk Sources	<ul style="list-style-type: none"> » Making of fires on site » Smoking outside of designated areas » The presence of operation and maintenance personnel and their activities on the site can increase the risk of veld fires.
Mitigation: Target/Objective	<ul style="list-style-type: none"> » 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. Apply for membership to the local Fire Protection Association, should there be one.	O&M Operator	Operation phase
Provide fire-fighting training to selected operation and maintenance staff.	O&M Operator	Operation phase
Ensure that appropriate communication channels are established to be implemented in the event of a fire.	O&M Operator	Operation phase
Fire breaks should be maintained where and when required. Cognisance must be taken of the relevant legislation when planning and burning firebreaks (in terms of timing, etc.). Access roads may also act as fire breaks.	O&M Operator	Operation phase
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 Operator	Operation phase
Contact details of emergency services should be prominently displayed on site.	O&M Operator	Operation phase

Performance Indicator	<ul style="list-style-type: none"> » Firefighting equipment and training provided during the operational phase of the Project. » Appropriate fire breaks in place.
Monitoring and Reporting	<ul style="list-style-type: none"> » The Project Developer must monitor indicators listed above to ensure that they have been met.

8.2. Monitoring Programme: Operation Phase of the Daisy Solar PV Facility

OBJECTIVE 11: 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/could result in significant environmental impacts for which corrective action is required. An internal environmental audit must be conducted every 6 months and an external audit must be conducted once a year in order to

confirm compliance with the requirements of all environmental permits for the Project, this EMPr, and all relevant legislation. The results of the audit reports must be made available to the DFFE and the relevant authorities on request and must be part of monitoring and audit reports. An annual audit report must be compiled and submitted to DFFE. The aim of the auditing process would be to routinely 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 the communication and feedback to authorities and stakeholders.

CHAPTER 9: MANAGEMENT PROGRAMME: DECOMMISSIONING

The solar infrastructure which will be utilised for the Daisy Solar PV Facility with Associated Infrastructure is expected to have a lifespan of 20 years (with the option to extend the facility life). Equipment associated with this Project would only be decommissioned once it has reached the end of its economic life. It must be noted that decommissioning activities will need to be undertaken in accordance with the legislation applicable at that time, which may require this section of the EMP to be revisited and amended.

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

» **Site Preparation**

Site preparation activities will include confirming the integrity of the access to the Project Site to accommodate the required equipment, preparation of the Project Site (e.g., laydown areas, construction platform) and the mobilisation of construction equipment to be used during decommissioning.

» **Dismantle and Remove Infrastructure**

The infrastructure such as the modules and mounting structures will be dismantled. Once dismantled, the components will be reused, recycled, or disposed of in accordance with regulatory requirements (NEMA / NEM:WA).

9.1. Objectives

In decommissioning the Daisy Solar PV Facility, Energy Team (Pty) Ltd must ensure that:

- » All structures not required for the post-decommissioning use of the site (may include the modules and mounting structures, substation, inverters and transformers, BESS, laydown areas, and O&M facilities) are dismantled and/or demolished, removed and waste material disposed of at an appropriately licensed waste disposal site or as required by the relevant legislation.
- » Access/service roads and servitudes not required for the post-decommissioning use of the site is rehabilitated. If necessary, an ecologist should be consulted to give input into rehabilitation specifications.
- » All disturbed areas are compacted, sloped, and contoured to ensure drainage and runoff and to minimise the risk of erosion.
- » Rehabilitated areas are monitored on a quarterly basis for at least a year following decommissioning and implement remedial action as and when required.
- » Any fauna encountered during decommissioning activities should be removed to safety by a suitably qualified person.
- » All vehicles to adhere to low-speed limits (i.e. 40km/h max) on the site, to reduce risk of faunal collisions as well as to reduce dust.
- » Retrenchments should comply with South African Labour legislation, relevant at the time of the site closure and decommissioning.

The general specifications of Chapter 7 (Construction) and Chapter 9 (Decommissioning) are also relevant to the decommissioning of the Daisy Solar PV Facility and must be adhered to.

APPENDIX A:
FACILITY LAYOUT AND SENSITIVITY MAPS

APPENDIX B:
GRIEVANCE MECHANISM FOR COMPLAINTS AND ISSUES

APPENDIX C:
OPEN SPACE MANAGEMENT PLAN

APPENDIX D:
RE-VEGETATION AND HABITAT REHABILITATION PLAN

APPENDIX E:
PLANT RESCUE AND PROTECTION PLAN

APPENDIX F:
TRAFFIC AND TRANSPORTATION MANAGEMENT PLAN

APPENDIX G:
STORMWATER AND EROSION MANAGEMENT PLAN

APPENDIX H:
WASTE MANAGEMENT PLAN

APPENDIX I:
EMERGENCY PREPAREDNESS, RESPONSE AND FIRE
MANAGEMENT PLAN

APPENDIX J:
CURRICULCUM VITAE OF THE PROJECT TEAM

GRIEVANCE MECHANISM / PROCESS

1. 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.

2. 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 Project Developer of the grievance mechanism and the process by which grievances can be brought to the attention of the Project Developer through its designated representative. This must be undertaken with the commencement of the construction phase.
- » The Project Developer needs to appoint a representative 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 or are illiterate, 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 two (2) working days of receipt of the grievance, must contact the Complainant to discuss the grievance and, if required, agree on a 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 or send a voice recording (in cases whereby the Complainant is illiterate) to be sent to the Complainant acknowledging receipt of the grievance, the name and contact details of Complainant, the nature of the grievance, the date that the grievance was raised, and the date and venue for the meeting (once agreed and only if required).
- » A grievance register must be kept on site (in electronic format, so as to facilitate editing and updating), and shall be made available to all parties wishing to gain access thereto.
- » Prior to the meeting being held the contact person must contact the Complainant to discuss and agree on the parties who should attend the meeting, as well as a suitable venue. The people who will be required to attend the meeting will depend on the nature of the grievance. While the Complainant and or Project 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 Project Developer within five (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 five (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 Project 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 Project Developer will be required to identify three (3) mediators and forward the names and CVs to the Complainant within two (2) weeks of the dispute being declared. The Complainant, in consultation with the Project 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 Project Developer. The Project Developer must supply and nominate a representative to capture minutes and record the meeting/s.

- » In the event of the grievance, with the assistance of the mediator, being resolved to the satisfaction of all the parties concerned, the outcome must be recorded and signed off by the relevant parties, including the mediator. The record should provide details on the date of the meeting/s, the names of the people that attended the meeting/s, the outcome of the meeting/s, and where relevant, the measures identified to address the grievance, the party responsible for implementing the required measures, and the agreed upon timeframes for the measures to be implemented.
- » In the event of the dispute not being resolved, the mediator must prepare a draft report that summaries the nature of the grievance and the dispute. The report should include a recommendation by the mediator on the proposed way forward with regard to the addressing the grievance.
- » The draft report must be made available to the Complainant and the Project 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 five (5) working days. The way forward will be informed by the recommendations of the mediator and the nature of the grievance.

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

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

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

ALIEN PLANT AND OPEN SPACE MANAGEMENT PLAN

1. PURPOSE

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

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

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

2. LEGISLATIVE CONTEXT

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

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

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

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

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

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

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

Plants listed under the categories above are detailed within the Alien and Invasive Species published in GNR1003 of 18 September 2020. The following guide is a useful starting point for the identification of alien 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 the Project Site.

3.2. Containment and control

If any alien invasive plants are found to become established on the Project 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 amount of energy and resources are required to maintain this status over the long-term. This will also be an indicator that natural systems are impacted to the smallest degree possible.

3.3. General Clearing and Guiding Principles

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

i. Clearing Methods

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

Fire should not be used for alien species control or vegetation management at the Project 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 Forestry, Fisheries and Environment (DFFE) 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 must be immediately controlled.
- » Care must be taken to avoid the introduction of alien invasive plant species to the site. Particular attention must be paid to imported material such as building sand or dirty earth-moving equipment. Stockpiles should be checked regularly and any weeds emerging from material stockpiles should be removed.
- » Cleared areas that have become invaded by alien species can be sprayed with appropriate herbicides provided that these herbicides break down on contact with the soil. Residual herbicides should not be used.
- » The effectiveness of vegetation control varies seasonally, and this is also likely to impact alien species. Control early in the wet season will allow species to re-grow, and follow-up control is likely to be required. It is tempting to leave control until late in the wet season to avoid follow-up control. However, this may allow alien species to set seed before control, and hence will not contribute

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

- » Alien plant management is an iterative process, and it may require repeated control efforts to significantly reduce the abundance of a species. This is often due to the presence of large and persistent seed banks. However, repeated control usually results in rapid decline once seed banks become depleted.
- » Some alien species are best individually pulled by hand. Regular vegetation control to reduce plant biomass within the site should be conducted. This should be timed so as to coincide with the critical growth phases of the most important alien species on site. This will significantly reduce the cost of alien plant management as this should contribute towards the control of the dominant alien species and additional targeted control will be required only for a limited number of species.
- » No alien species should be cultivated on-site. If vegetation is required for aesthetic purposes, then non-invasive, water-wise locally occurring species should be used.
- » During operation, surveys for alien species should be conducted regularly. It is recommended that this be undertaken every six (6) months for the first two (2) 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, rehabilitation efforts, follow-ups 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 of March) 3 Monthly during Winter and Spring
Document alien plant distribution	Alien plant distribution map within priority areas	Quarterly

Document & record alien plant control measures implemented	Record of clearing activities	Quarterly
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Operation Phase

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

REVEGETATION AND REHABILITATION PLAN

1. PURPOSE

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

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

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

2. REHABILITATION METHODS AND PRACTISES

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

- » The footprint should be limited much as possible through reducing the excess footprint around roads, PV panel footings etc as much as possible.
- » Topsoil should be reserved wherever possible on site, to be utilised during rehabilitation.
- » Clearing of invaded areas should be conducted as per the Alien Plant and Open Spaces Management Plan, included in the EMPr.
- » No harvesting of vegetation may be undertaken outside the area to be disturbed by construction activities.
- » It is important to select the correct species to use for rehabilitation.
- » Indigenous plant material must be kept separate from alien material.
- » Re-seeding with collected or commercial indigenous seed mixes is recommended. 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.
- » Sods used for revegetation should be obtained directly from the Project Site, but not from the sensitive areas. Sods should contain at least a 50 mm topsoil layer and be minimally disturbed, in particular to existing root systems. Sods must ideally be obtained from areas as close as possible to the region that is to be rehabilitated.
- » Water used for the irrigation of re-vegetated areas should be free of chlorine and other pollutants that might have a detrimental effect on the plants.
- » All seeded, planted or sodded grass areas and all shrubs or trees planted are to be irrigated at regular intervals.
- » On steep slopes and areas where seed and organic matter retention is low, it is recommended that soil savers are used to stabilise the soil surface. Soil savers are man-made materials, usually constructed of

organic material such as hemp or jute and are usually applied in areas where traditional rehabilitation techniques are not likely to succeed.

- » In areas where soil saver is used, it should be pegged down to ensure that it captures soil and organic matter flowing over the surface.
- » The final rehabilitated area should resemble the current composition and structure of the soil as far as practicably possible.
- » Progressive rehabilitation is an important element of the rehabilitation strategy and should be implemented where feasible.
- » No construction equipment, vehicles or unauthorised personnel should be allowed onto areas that have been rehabilitated.
- » Where rehabilitation sites are located within actively grazed areas, they should be fenced off, this must be undertaken in consultation with the landowner.
- » Any runnels, erosion channels or wash-aways developing after revegetation should be backfilled and consolidated and the areas restored to a proper stable condition.
- » Re-vegetated areas should be monitored frequently and prepared and revegetation from scratch should inadequate signs of surface coverage or grown 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.

3. 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 Project Developer will need to identify a suitable entity that will be able to take over and maintain the monitoring cycle and initiate adaptive management as soon as it is required. Monitoring personnel must be adequately trained.

The following are the minimum criteria that should be monitored:

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

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

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

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

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

SEARCH AND RESCUE AND PROTECTION PLAN

1. PURPOSE

The purpose of the Search and Rescue and Protection Plan is to implement avoidance and mitigation measures, in addition to the mitigations included in the EMP, to reduce the impact of the Daisy Solar PV Energy Facility's establishment on listed and protected plant species and their habitats during construction and operation. This subplan is required in order to ensure compliance with national and provincial legislation for vegetation clearing and any required destruction or translocation of provincially and nationally protected species within the Development Footprint.

2. IDENTIFICATION OF SPECIES OF CONSERVATION CONCERN

Plant species are protected at a 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 Environment (DFFE) under the National List of Protected Trees, which is updated on a regular basis. Any clearing of nationally protected trees requires a permit from DFFE. At the provincial level, all species red-listed under the Red List of South African plants (<http://redlist.sanbi.org/>) as well as species listed under the the National Environmental Management Biodiversity Act, No. 10 of 2004 protected and require provincial permits.

Protected fauna species red-listed under the Red List of South African plants (<http://redlist.sanbi.org/>) as well as species listed under the National Environmental Management Biodiversity Act, No. 10 of 2004 are protected and require provincial permits.

3. IDENTIFICATION OF LISTED SPECIES

The DFFE Screening Tool indicates that there are several potential botanical sensitivities from the Daisy PV Facility study area, with the result that the whole of the site is mapped as Medium Sensitivity for the Plant Species Theme. Although the majority of these species were not observed within the site, several additional species of concern were confirmed present within the site. Although the conditions at the time of the field assessment were good, this followed an extended drought in the region and effects of this were visible in the field with large amounts of dead shrubs present and a low cover of annuals and geophytes in the open spaces between the perennials. As a result, it is possible that some of the plant species of concern are present at the site but were only represented in the seed bank and were not visible at the time of the field assessment. However, for those species which are present, the site was very well covered and if any species were missed, these would have had a very low abundance. As such, the results of the site verification are considered reliable and the assessment of the presence or absence of a species at the site is considered to have a relatively high confidence.

Based on the presence of *Wahlenbergia asparagoides* (VU) which is common across most of the site and *Helichrysum tricostatum* (NT), which was uncommon and occasional within the site, a full species assessment for each of these species would be required.

Plant species of conservation concern that are known to occur in the vicinity of the Daisy PV Facility site according to the DFFE Screening Tool as well as additional species of concern identified during the field assessment.

Species	Presence on the Daisy Site
<i>Manulea cinerea</i> (VU)	Not Present – High Confidence
<i>Tetragonia pillansii</i> (VU)	Not Present – Moderate Confidence
Sensitive species 233 (Rare)	Not Present – High Confidence
<i>Ifloga lerouxiae</i> (Rare)	Not Present – Moderate Confidence
<i>Leucoptera nodosa</i> (VU)	Not Present – High Confidence
Sensitive species 169 (VU)	Not Present – High Confidence
Sensitive species 463 (Rare)	Not Present – High Confidence
<i>Nemesia saccata</i> (VU)	Not Present – Low Confidence
<i>Helichrysum tricostatum</i> (NT)	Present – Moderate Confidence
<i>Wahlenbergia asparagoides</i> (NT)	Present – Common

Invasive Alien Plants (IAPs) tend to dominate or replace indigenous flora, thereby transforming the structure, composition and functioning of ecosystems. Therefore, it is important that these plants are controlled by means of an eradication and monitoring programme. Some invader plants may also degrade ecosystems through superior competitive capabilities to exclude native plant species.

NEMBA is the most recent legislation pertaining to alien invasive plant species. In August 2014, the list of Alien Invasive Species was published in terms of the NEMBA. The Alien and Invasive Species Regulations were published in the Government Gazette No. 43726, 18 September 2020. The legislation calls for the removal and / or control of AIP species (Category 1 species). In addition, unless authorised thereto in terms of the NWA, no land user shall allow Category 2 plants to occur within 30 meters of the 1:50 year flood line of a river, stream, spring, natural channel in which water flows regularly or intermittently, lake, dam or wetland. Category 3 plants are also prohibited from occurring within proximity to a watercourse. Below is a brief explanation of the three categories in terms of the NEMBA:

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

Note that according to the Alien and Invasive Species Regulations, a person who has under his or her control a category 1b listed invasive species must immediately:

- Notify the competent authority in writing
- Take steps to manage the listed invasive species in compliance with:
 - Section 75 of the NEMBA;
 - The relevant invasive species management programme developed in terms of regulation 4; and
 - Any directive issued in terms of section 73(3) of the NEMBA.

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 The National Environmental Management Biodiversity Act 10 of 2004 permits which must be obtained before construction can commence.

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

5. RESCUE AND PROTECTION PLAN

5.1. Pre-construction

- » Identification of all listed species which may occur within the Project Site, based on the SANBI POSA database as well as the specialist studies for the Project 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 Project 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 Project Site and relocate species of concern is required from DFFE authority before construction commences.
- A tree clearing permit is also required from DFFE to clear protected trees from the Project Site (if recorded).
- 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.
- » The EO should monitor vegetation clearing at the project 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.

5.3. Operation

- » Access to the Project Site should be strictly controlled and all personnel entering or leaving 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 Project 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 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 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 Project 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.

PRINCIPLES FOR TRAFFIC MANAGEMENT

1. PURPOSE

The purpose of this Traffic Management Plan (TMP) is to address regulatory compliance, traffic management practices, and protection measures to help reduce impacts related to transportation and the construction of temporary and long-term access within the vicinity of the Daisy Solar PV Facility Project Site. The objectives of this plan include the following:

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

2. TRAFFIC AND TRANSPORTATION MANAGEMENT PRINCIPLES

- » Prior to the commencement of construction, the contractor must develop their own detailed Transport Management Plan (TMP) based on traffic volumes and road carry capacity outlines in this plan.
- » The transport contractor must ensure that all required permits for the transportation of abnormal loads are in place prior to the transportation of equipment and Project components to the Project Site. Specific abnormal load routes must be developed with environmental factors taken into consideration.
- » Before construction commences, authorised access routes must be clearly marked in the field with signs or flagging. The Construction Contractor must review the location of designated access and will be responsible for ensuring construction travel is limited to designated routes. The entrance of the main access road must not be constructed before a blind rise or on a bend of the public road.
- » All employees must attend an environmental training program (e.g., toolbox talks) by the Environmental Officer (EO). Through this program, employees will be instructed to use only approved access roads, drive within the delineated road limits, and obey jurisdictional and posted speed limits to minimise potential impacts to the environment and other road users.
- » The Construction 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 Project Site.
- » Speed limits must be established prior to commencement of construction and enforced over all construction traffic.
- » Speed controls and implementation of appropriate dust suppression measures must be enforced to minimise dust pollution.

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

3. MONITORING

- » The Construction 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.

STORMWATER AND EROSION MANAGEMENT PLAN

1. PURPOSE

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

This Stormwater Management Plan addresses the management of stormwater runoff from the Project Site and significant impacts relating to resultant impacts such as soil erosion and downstream sedimentation. The main factors influencing the planning of stormwater management measures and infrastructure are:

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

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

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

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

2. RELEVANT ASPECTS OF THE PROJECT SITE

The Daisy PV Facility footprint falls entirely within the Namaqualand Strandveld vegetation type. Although there is some variation in the vegetation composition of the site relating to substrate conditions, these differences represent different communities rather than different vegetation types and there are no significant vegetation features within the site.

The soil profiles classified within the Daisy Solar PV Facility development area and grid connection consist of the Namib soil form. The Namib was found in the Daisy solar PV area, authorised collector substation and in the grid connection corridor. The Namib consists of an orthic A-horizon overlying a regic sand and had depths exceeding 1.4 m as no restrictive layer was found. The Namib has a red regic sand and was non-calcareous.

The largest part of the Daisy Solar PV Facility development area and grid connection corridor consists of land with Low (Class 05) land capability. This land capability class is present within the entire boundary of the development area while small areas in the centre section of the PV facility consisting of land with Low-Moderate (Class 06) land capability.

Following the classification of the soil and the consideration of the soil properties and limiting factors to rainfed crop production, calculated land capability of the soil within the development area was determined. The total development area assessed, has Low land capability has been assigned to soils of the Namib and Coega soil form because of the regic sand and shallow depth that has a very low water holding capacity and structure. The low land capabilities of the soils within the development area is confirmed by the absence of crop field boundaries within the Daisy Solar PV Facility development area.

3. STORMWATER MANAGEMENT PRINCIPLES

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

- » Prevent concentration of stormwater flow at any point where the ground is susceptible to erosion.
- » Reduce stormwater flows as far as possible by the effective use of attenuating devices (such as swales, berms, and silt fences). As construction progresses, the stormwater 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 stormwater flow above that which the natural ground can safely accommodate at any point in the sub-catchments.
- » Ensure that all stormwater control works are constructed in a safe and aesthetic manner in keeping with the overall development.
- » Plan and construct stormwater 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 stormwater flow should not exceed the capacity of the culvert. To assist with the stormwater run-off, gravel roads should typically be graded and shaped with a 2-3% cross fall back into the slope, allowing stormwater to be channelled in a controlled manner towards the, natural drainage lines and to assist with any sheet flow on the site.
- » Design culvert inlet structures to ensure that the capacity of the culvert does not exceed the pre-development stormwater flow at that point. Provide detention storage on the road and/or upstream of the stormwater 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 stormwater 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 stormwater system.
- » Preferably all drainage channels on Project 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 Stormwater 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 this Stormwater 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 stormwater control measures (post construction) must be indicated within the Final/Updated Stormwater Management Plan.
- » All temporary and permanent water management structures or stabilisation methods must be indicated within the Final/Updated Stormwater Management Plan.
- » The drainage system for the site should be designed to specifications that can adequately deal with a 1:50 year intensity rainfall event or more to ensure sufficient capacity for carrying stormwater around and away from infrastructure.
- » Procedures for stormwater flow through a Project Site need to take into consideration both normal operating practice and special circumstances. Special circumstances in this case typically include severe rainfall events.
- » The Resident Engineer and EO 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 stormwater plan is not correctly or appropriately implemented and damage to the environment is caused.

During the construction phase, the Contractor must prepare a Stormwater 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 Stormwater Management Plan are met before, during and after construction. The designated responsible person on site, must be indicated in the Stormwater Control Method Statement and shall ensure that no construction work takes place before the relevant stormwater control measures are in place.

4. EROSION MANAGEMENT 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 Project 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.

4.1. On-Site Erosion Management

Soil erosion is a frequent risk associated with the development of a Solar PV Energy Facility on account of the vegetation clearing and disturbance associated with the construction phase of the development and may continue occurring throughout the operation phase. Service roads and installed infrastructure will generate increased direct runoff during intense rainfall events and may exacerbate the loss of topsoil and the effects of erosion. These eroded materials may enter the nearby watercourses and may potentially impact these systems through siltation and change in chemistry and turbidity of the water. General factors to consider regarding erosion risk at the Project Site includes the following:

- » Reduction of a stable vegetation cover and associated below-ground biomass that currently increases soil surface porosity, water infiltration rates and thus improves the soil moisture availability. Without the vegetation, the soil will be prone to extensive surface capping, leading to accelerated erosion and further loss of organic material and soil seed reserves from the local environment.
- » 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. Additionally, it is recommended where possible that 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 stormwater 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 denuded 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 Project 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 Project 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.

4.1.1 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;
- » Stormwater channels and catch pits;
- » Soil bindings;
- » Geofabrics;
- » Hydro-seeding and/or re-vegetating;
- » Mulching over cleared areas;
- » Boulders and size varied rocks; and
- » Tilling.

4.2. Engineering Specifications

A detailed engineering specifications Stormwater Management Plan describing and illustrating the proposed stormwater control measures must be prepared during the detailed design phase and should be based on the underlying principles of the Stormwater Management Plan 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 stormwater control measures (post construction).
- » All temporary and permanent water management structures or stabilisation methods must be indicated within the Stormwater Management Plan.
- » The Resident Engineer and EO 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 Stormwater Management Plan is not correctly or appropriately implemented and damage to the environment is caused.

4.3 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 EO (during construction) or Environmental Manager (during operation) must:

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

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

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

5. CONCLUSION

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

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

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 the Project Site.

This WMP has been compiled as part of the 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 should further detail regarding waste quantities and categorisation become available, during the construction and/or operation stages.

2. RELEVANT ASPECTS OF THE SITE

It is expected that the development of the Daisy Solar PV Facility will generate construction solid waste, general waste and hazardous waste during the lifetime of the Project.

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

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

3. LEGISLATIVE REQUIREMENTS

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

- » National Environmental Management: Waste Act (NEM:WA), 2008 (Act 59 of 2008);
- » National Environmental Management: Waste Amendment Act, 2014 (Act 26 of 2014);
- » The South African Constitution (Act 108 of 1996);
- » Hazardous Substances Act (Act 5 of 1973);
- » Health Act (Act 63 of 1977);
- » Environment Conservation Act (Act 73 of 1989);
- » Occupational Health and Safety Act (Act 85 of 1993);
- » National Water Act (Act 36 of 1998);
- » The National Environmental Management Act (Act 107 of 1998) (as amended);

- » Municipal Structures Act (Act 117 of 1998);
- » Municipal Systems Act (Act 32 of 2000);
- » Mineral and Petroleum Resources Development Act (Act 28 of 2002); and
- » Air Quality Act (Act 39 of 2004).

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

4. WASTE MANAGEMENT PRINCIPLES

An integrated approach to waste management is needed on the Project 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.

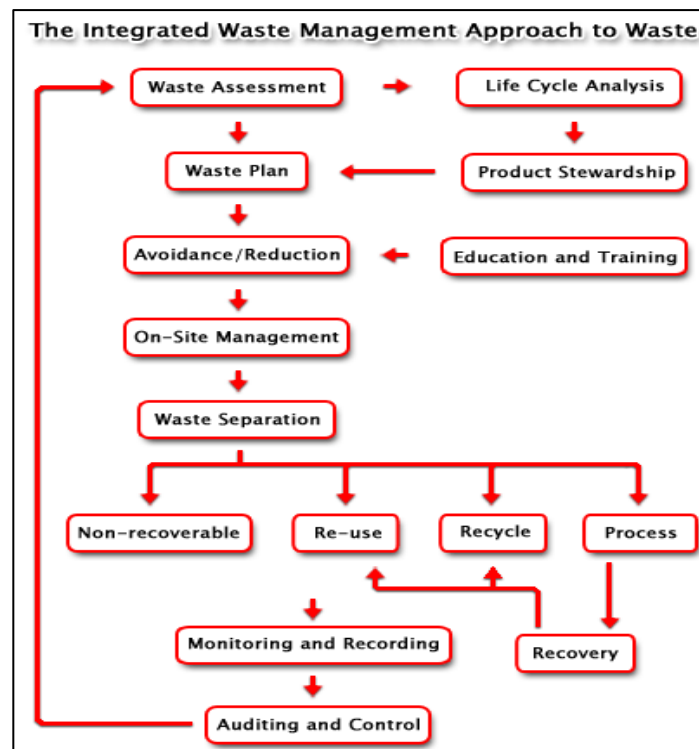


Figure 1: Integrated Waste Management Flow Diagram

(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, Project/Site Manager and/or ECO.

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 Project Site for the storage of all waste streams before removal from site. The storage period must not trigger listed waste activities as per the NEM:WA, 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 110% 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' EO 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 EO 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

- » 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 stormwater system separating clean and contaminated stormwater.
- » Collection bins placed around the Project 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 removed 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 Waste Management Plan is determined by measuring criteria such as waste volumes, cost recovery from recycling and cost of disposal. Recorded data can indicate the effect of training and education, or the need for education. It will provide trends and benchmarks for setting goals and standards. It will provide clear evidence of the success or otherwise of the plan.

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

4.1.6. Training

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

4.2. Operation phase

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

The following waste management principles apply during the operation phase:

- » The EO 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 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.

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.

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

2. PROJECT-SPECIFIC DETAILS

The Project Site has been identified as a technically feasible site which has the potential for the development of the Solar PV Facility, through the consideration of a number of technical factors. A Project Site of approximately ~652ha has been identified by the Project Developer.

The infrastructure associated with the PV facility includes:

- » Solar PV array comprising PV modules and mounting structures
- » Inverters and transformers
- » Low voltage cabling between the PV modules to the inverters
- » 33kV cabling between the project components and the facility substation
- » 132kV onsite facility substation

- » 132kV power line to connect to the grid at the authorised Zonnequa Collector Substation within a 300m wide and 3.5km long corridor
- » Battery Energy Storage System (BESS)
- » Site offices and maintenance buildings, including workshop areas for maintenance and storage
- » Laydown areas
- » Site access and internal roads

Due to the scale and nature of this Project, 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;
- » Accidents; and
- » Natural disasters.

3. EMERGENCY RESPONSE PLAN

There are three (3) levels of emergency as follows:

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

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

Every effort must be made to control, reduce or stop the cause of any emergency provided it is safe to do so. For example, in the event of a fire, isolate the fuel supply and limit the propagation of the fire by cooling the adjacent areas. Then confine and extinguish the fire (where appropriate) making sure that re-ignition cannot occur.

3.1. Emergency Scenario Contingency Planning

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

i. Spill Prevention Measures

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

- » All equipment refuelling, servicing and maintenance activities should only be undertaken within appropriately sealed/contained or bunded designated areas.

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

ii. Procedures

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

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

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

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

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

Containment of Spills on Land

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

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

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

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

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

c) Procedures for restoring affected areas

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

3.1.2. Scenario: Fire (and fire water handling)

i. Action Plan

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

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

ii. Procedures

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

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

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

a) Procedures for initial actions

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

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

b) Reporting procedures

In terms of the requirements of NEMA, the responsible person must, within fourteen (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

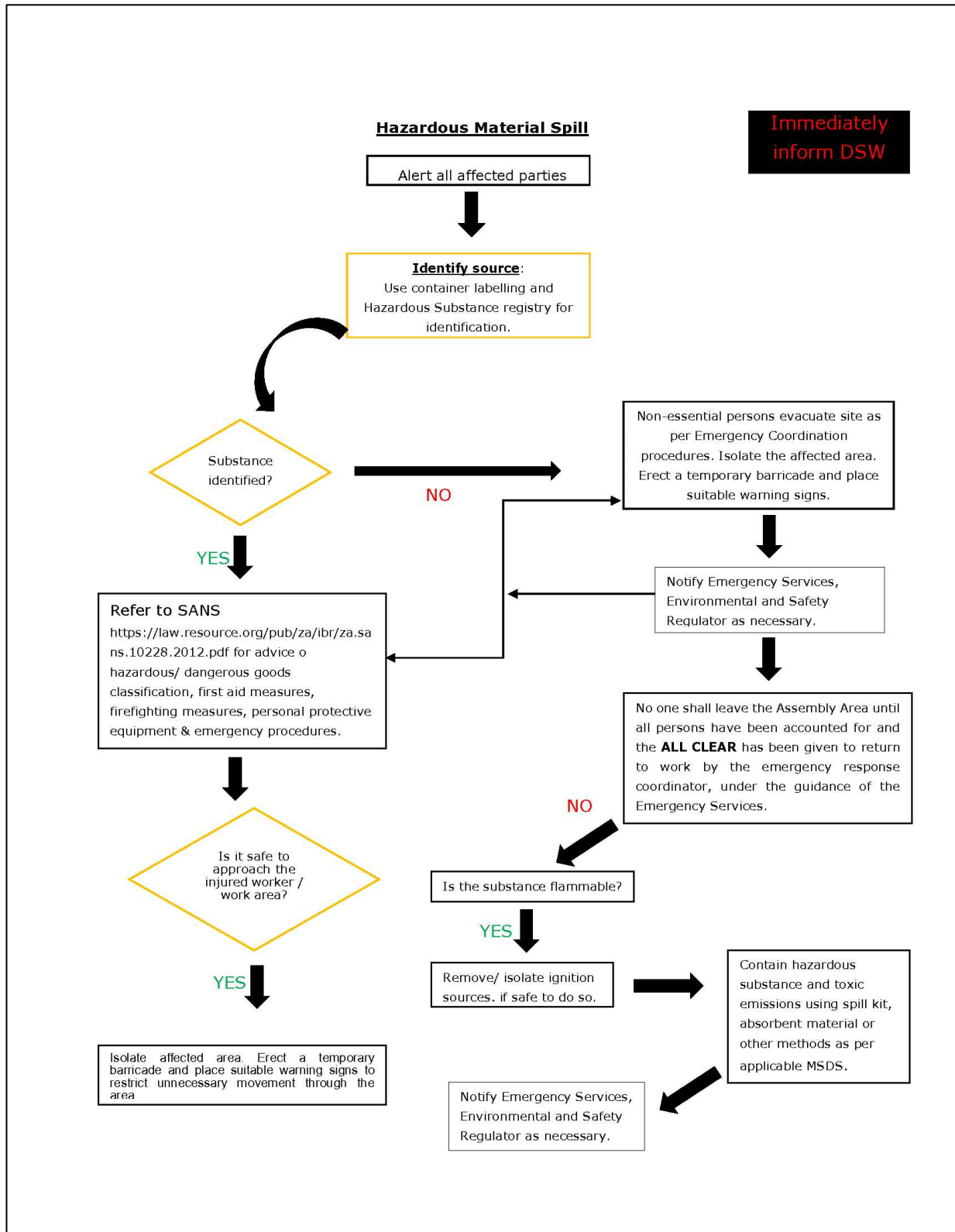


Figure 1: Hazardous Material Spill

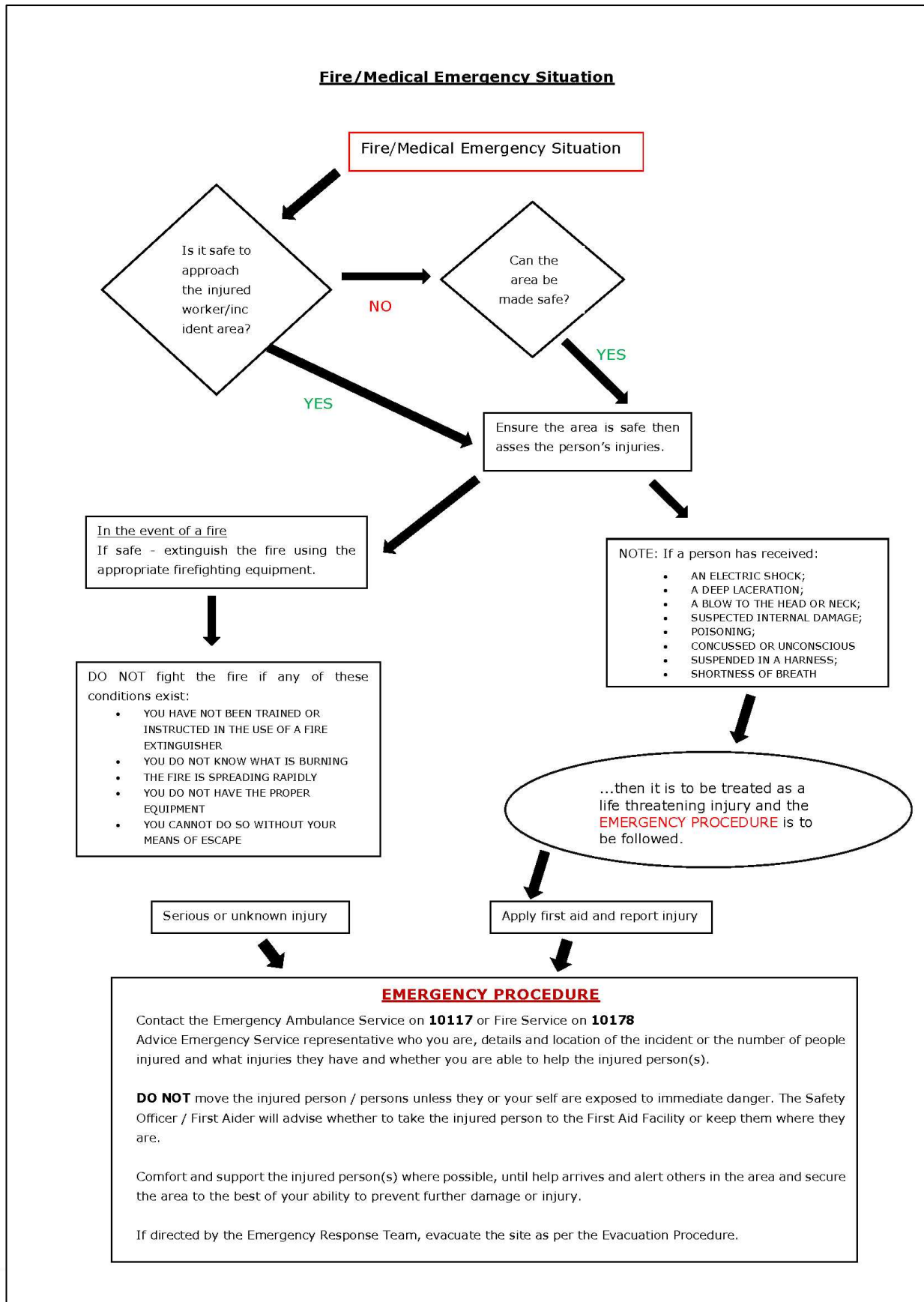


Figure 2: Emergency Fire/Medical

4. PROCEDURE RESPONSIBILITY

The Contractor's Environmental and Safety and Health officers, 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 EO 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.