

# Zuurwater 75 MW Photovoltaic Plant (Phase 1), Northern Cape Province

DEA REF: 14/12/16/3/3/2/470

External Environmental Compliance Audit Report of  
the Environmental Management Programme (EMPr),  
in accordance with Regulation 54(A) of the EIA  
Regulations (2017)

December 2019

savannah  
environmental

t +27 (0)11 656 3237

f +27 (0)86 684 0547

e info@savannahsa.com

w www.savannahsa.com

**Prepared for:**

Scatec Solar (Pty) Ltd  
2<sup>nd</sup> Floor North Wing,  
3 Dock Road, Waterway House,  
V&A Waterfront,  
Capetown  
8001

**Prepared by:**

savannah  
environmental

## REPORT DETAILS

---

<b>DEA Reference No.</b>	:	14/12/16/3/3/2/470
<b>Environmental Assessment Practitioner (EAP)</b>	:	Karen Jodas (Savannah Environmental)
<b>Title</b>	:	External Environmental Compliance Report for the Zuurwater 75 MW Photovoltaic Plant (Phase 1), Northern Cape Province
<b>Author</b>	:	Savannah Environmental (Pty) Ltd Kritanya Naidoo
<b>Internal Review</b>	:	Jo-Anne Thomas
<b>Client</b>	:	Scatec Solar (Pty) Ltd
<b>Date</b>	:	December 2019

**When used as a reference this report should be cited as:** Savannah Environmental (2019) External Environmental Compliance Report for Zuurwater 75 MW Photovoltaic Plant (Phase 1), Northern Cape Province

**COPYRIGHT RESERVED**

This technical report has been produced for Scatec Solar (Pty) Ltd. The intellectual property contained in this report remains vested in Savannah Environmental (Pty) Ltd. No part of the report may be reproduced in any manner without written permission from Savannah Environmental (Pty) Ltd or Scatec Solar (Pty) Ltd.

## DECLARATION OF INTEREST

---

I, Kritanya Naidoo, declare that:

- » I act as the independent environmental auditor for the environmental compliance audit (November 2019).
- » I have performed the work relating to the audit in an objective manner, even if this results in views and findings that are not favourable to the applicant.
- » I declare that there are no circumstances that may compromise my objectivity in performing such work.
- » I have expertise in conducting independent environmental audits, including knowledge of NEMA, the 2014 EIA Regulations (GNR 326) and any guidelines that have relevance to the activity.
- » I have complied with NEMA, the 2014 EIA Regulations (GNR 326) and all other applicable legislation.
- » I have no, and have not engaged in, conflicting interests in the undertaking of the audit.
- » I have undertaken to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing – any decision to be taken with respect to the project by the competent authority; and – the objectivity of any report, plan or document prepared by myself for submission to the competent authority.
- » All the particulars furnished by me in this report are true and correct.
- » I realise that a false declaration is an offence in terms of Regulation 48 and is punishable in terms of section 24F of the Act.
- » I do not have and will not have any vested interest (either business, financial, personal or other) in the project other than remuneration for work performed.

Kritanya Naidoo (Auditor)



Signature

December 2019

Date

Jo-Anne Thomas (Internal Reviewer, SACNASP Membership No: 400024/2000)



Signature

December 2019

Date

---

## ACRONYMS AND ABBREVIATIONS

---

DEA	Department of Environmental Affairs (National)
DoE	Department of Energy
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme
I&AP	Interested and Affected Party
IPP	Independent Power Producer
MW	Megawatts

## TABLE OF CONTENTS

	PAGE
REPORT DETAILS .....	i
DECLARATION OF INTEREST.....	ii
ACRONYMS AND ABBREVIATIONS.....	iii
TABLE OF CONTENTS.....	iv
1. INTRODUCTION AND BACKGROUND.....	1
1.1. Project Background .....	1
2. OBJECTIVE OF THE AUDIT.....	2
3. PURPOSE AND SCOPE .....	3
4. OVERVIEW OF THE INDEPENDENT ENVIRONMENTAL AUDITORS .....	4
5. ASSUMPTIONS AND LIMITATIONS .....	4
6. APPROACH TO CONDUCTING THE AUDIT.....	4
6.1. Pre-audit planning.....	4
6.2. Conducting the Audit.....	5
6.3. Post Audit.....	5
7. FINDINGS OF THE AUDIT.....	5
8. AUDIT RESULTS AND RECOMMENDATIONS .....	16
8.1. Overview of Audit Findings and Conclusion.....	16
9. EVALUATION OF THE EMPR .....	16
9.1. Ongoing impact avoidance, management and mitigation .....	16
9.2. Closure impact avoidance, management and mitigation .....	17
9.3. Ensuring compliance with provisions of the EMP .....	17
10. CONCLUSIONS AND RECOMMENDATIONS.....	17
11. STAKEHOLDER CONSULTATION.....	17
11.1. Notification of all potential and registered interested and affected parties.....	17

### APPENDICES

- Appendix A:** CVs of Independent Auditor/s and Report Reviewer  
**Appendix B:** Advertisement of submission of the Audit Report  
**Appendix C:** Notification to registered I&APs of submission of the Audit Report  
**Appendix D:** Confirmation letter on current status of the project

# 1. INTRODUCTION AND BACKGROUND

---

Section 54(a)(3) of the EIA regulations (GNR 326, 7 April 2018) states:

*(3) Where an environmental authorisation issued in terms of the ECA regulations or the previous NEMA regulations is still in effect by 8 December 2014, the EMPr associated with such environmental authorisation is subject to the requirements contained in Part 3 of Chapter 5 of these Regulations and the first environmental audit report must be submitted to the competent authority no later than 7 December 2019 and at least every 5 years thereafter for the period during which such environmental authorisation is still in effect.*

In accordance with these regulations, Savannah Environmental (Pty) Ltd has been appointed by Scatec Solar (Pty) Ltd to undertake an external environmental compliance audit and prepare an external environmental compliance audit report towards assessing the compliance of the EMPr for the project as per the regulations detailed above. The external environmental compliance audit was conducted to demonstrate Scatec Solar (Pty) Ltd's compliance with the EMPr applicable to the project.

## 1.1. Project Background

The Zuurwater Photovoltaic Plant, Phase 1, is located on the remaining extent of portion three of the Farm Zuurwater No. 62, approximately 11.5km south-west of the town of Aggeneys (straight line distance), within the Namakwa District, Northern Cape Province. The generating capacity for this project is 75MW, and covers an area of 267ha.

The infrastructure associated with the project includes:

- » Arrays of either static or tracking photovoltaic (PV) panels.
- » Mounting structures to support the PV panels.
- » Cabling between the project components.
- » Power inverters between the PV arrays. The inverter and transformer are housed at the power conversion station (PCS).
- » Photovoltaic Combining Switchgear (PVCS).
- » Internal power collection system between the PVCS and the on-site substation.
- » A new on-site substation and power line to transmit the power from Phase 1 into the Eskom grid via the Aggeneis MTS Substation.
- » A new overhead power line (up to a voltage of 275kV).
- » A new temporary on-site water reservoir and associated water supply pipeline (shared infrastructure between all phases). Three alternative locations and associated pipeline routes were identified for investigation.
- » Internal access roads.
- » Office, workshop area for maintenance and storage.
- » Temporary infrastructure including housing for workers, construction trailers, construction water storage ponds and a laydown area during the construction phase

The project was authorised on 10 July 2014 (DEA Ref No.: 14/12/16/3/3/2/470). The EA is currently valid until 27 July 2024. Construction has not yet commenced for the Zuurwater MW Photovoltaic Plant (Phase 1) (refer to **Appendix D** for a letter from the applicant confirming the project status). This external environmental compliance report was completed on the 4<sup>th</sup> of December 2019 and focuses on the pre-construction conditions of the project EMPr dated November 2013.

## 2. OBJECTIVE OF THE AUDIT

The objective of this environmental audit as contained in Appendix 7 of the 2014 Environmental Impact Assessment (EIA) Regulations (GNR 326) and Regulation 54(a) is to:

- » Report on:
  - \* The level of compliance with the conditions of the EMPr.
  - \* The extent to which the avoidance, management and mitigation measures provided for in the EMPr, achieve the objectives and outcomes of the EMPr.
- » Identify and assess any new impacts and risks as a result of undertaking the activity.
- » Evaluate the effectiveness of the EMPr.
- » Identify shortcomings in the EMPr.
- » Identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr.

This Environmental Audit Report has been prepared in accordance with Appendix 7 of the 2014 EIA Regulations (GNR 326). An overview of the contents of the Environmental Compliance Audit Report, as prescribed by Appendix 7 of the 2014 EIA Regulations (GNR 326), and where the corresponding information can be found within the report is provided in **Table 1**.

**Table 1: Summary of where the requirements of Appendix 7 of the 2014 EIA Regulations (GNR 326) are provided in this Environmental Compliance Audit Report.**

Requirement	Location in Report
(a) Details of the – <ul style="list-style-type: none"> <li>(i) Independent person who prepared the environmental audit report.</li> <li>(ii) Expertise of the independent person that compiled the environmental audit report.</li> </ul>	Refer to <b>Section 4</b> Refer to <b>Appendix A</b>
(b) A declaration that the independent auditor is independent in a form as may be specified by the competent authority.	Refer to <b>Declaration of Interest</b>
(c) An indication of the scope of, and the purpose for which, the environmental audit report was prepared.	Refer to <b>Section 3</b>
(d) A description of the methodology adopted in preparing the environmental audit report.	Refer to <b>Section 6</b>
(e) An indication of the ability of the EMPr, and where applicable, the closure plan to – <ul style="list-style-type: none"> <li>(i) Sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis.</li> <li>(ii) Sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the closure of the facility.</li> </ul>	Refer to <b>Section 10</b>



Requirement	Location in Report
(iii) Ensure compliance with the provisions of environmental authorisation, EMPr, and where applicable, the closure plan.	
(f) A description of any assumptions made, and any uncertainties or gaps in knowledge.	Refer to <b>Section 5</b>
(g) A description of any consultation process that was undertaken during the course of carrying out the environmental audit report.	Refer to <b>Section 6</b>
(h) A summary and copies of any comments that were received during any consultation process.	Refer to <b>Section 6</b>
(i) Any other information requested by the competent authority.	N/A

### 3. PURPOSE AND SCOPE

This Environmental Audit has been conducted to determine Scatec Solar (Pty) Ltd compliance with applicable environmental management requirements, as per the requirements of Section 54(A)(3) of the EIA Regulations, GNR 326 of 2017. The scope of the Environmental Audit is confined to an assessment of those environmental management requirements contained within the project EMPr.

### 4. OVERVIEW OF THE INDEPENDENT ENVIRONMENTAL AUDITORS

The Zuurwater 75 MW Photovoltaic Plant (Phase 1) was initially authorised through Karen Jodas of Savannah Environmental as the Environmental Assessment Practitioner. This independent environmental compliance audit was undertaken by Kritanya Naidoo (refer to **Table 2**), and reviewed by Jo-Anne Thomas (refer to **Table 3**).

**Table 2: Details of the Independent Environmental Auditors for this Section 54 audit report.**

<b>Name</b>	<b>Kritanya Naidoo</b>
<b>Position:</b>	Environmental Consultant
<b>Company:</b>	Savannah Environmental (Pty) Ltd
<b>Qualification:</b>	BSS Honours Environmental Management
<b>Professional Registration:</b>	None
<b>Experience:</b>	1 year
<b>Contact:</b>	011 656 3237
<b>Email:</b>	kritanya@savannahsa.com

**Table 3: Details of the Report Reviewer.**

<b>Name:</b>	Jo-Anne Thomas
<b>Position:</b>	Project Manager and Director
<b>Company:</b>	Savannah Environmental (Pty) Ltd
<b>Qualification:</b>	M.Sc. Botany
<b>Professional Registration:</b>	Professional Natural Scientist (400166/11) (SACNASP)
<b>Experience:</b>	21 years
<b>Contact:</b>	011 656 3237
<b>Email:</b>	joanne@savannahsa.com

A signed Declaration of Interest confirming the auditors' independence is included in this Environmental Audit Report. CVs of the Independent Environmental Auditor and Report Reviewer are attached as **Appendix A** to this report.

## 5. ASSUMPTIONS AND LIMITATIONS

---

The following limitations are applicable to this Environmental Audit Report:

- » The results of the Environmental Audit Report are limited due to the fact that the Zuurwater 75 MW Photovoltaic Plant (Phase 1) is currently not operational, and no construction activities have commenced to date (i.e. no authorised activities have commenced), and therefore all the conditions contained in the EMPr relating to any development phase of the facility are not currently applicable. Commenting on the compliance of the project is therefore limited.

## 6. APPROACH TO CONDUCTING THE AUDIT

---

### 6.1. Pre-audit planning

Prior to undertaking the audit, the scope and objectives of the audit were determined through a review of relevant information applicable to the project.

Following the review of existing information, an audit checklist was prepared for use as a tool during the audit to identify any issues of non-compliance and / or areas where action plans may be required to be implemented to address any identified issues of concern.

The audit checklist was prepared based on the licensing and management specifications contained within the Environmental Management Programme (EMPr) for the Zuurwater 75 MW Photovoltaic Plant (Phase 1) (November 2013) (DEA Reference No.: 14/12/16/3/3/2/470).

As the Zuurwater 75 MW Photovoltaic Plant (Phase 1) is currently not operational, and no construction activities have commenced to date (i.e. no authorised activities have commenced), all the conditions contained in the EMPr relating to commencement, construction, operation and decommissioning of the facility are not currently applicable. **As such, these conditions have been omitted from the audit checklist and are not shown or reported on in this report.** Should these activities commence in future, these conditions must be included into future audit checklists and reported on within the audit.

## 6.2. Conducting the Audit

As no activities have commenced to date, a desktop audit was conducted of the relevant and applicable EMPr conditions only. This included a review of all information relating to the compliance of relevant EMPr pre-construction conditions.

## 6.3. Post Audit

Following the audit, an Environmental Compliance Audit Report was compiled in accordance with the requirements of Appendix 7 of the EIA Regulations, 2014, as amended (GNR326). A copy of this Audit Report was submitted to the Department of Environmental Affairs (DEA) in accordance with the requirements of Section 54(A)(3) prior to the 7<sup>th</sup> of December 2019.

# 7. FINDINGS OF THE AUDIT

---

Compliance ratings were provided for each element of the audit checklist using the 4-point rating scale described below:

Compliance status	Rating	Description of compliance
Compliant	3	Compliant with no further action required to maintain compliance
Compliant	2	Compliant apart from minor or immaterial recommendations to improve the strength internal controls to maintain compliance
Compliant	1	Compliant with major or material recommendations to improve the strength of internal controls to maintain compliance
Non-Compliant	0	Does not meet minimum requirements

**Table 4** provide details of the findings of the audit.

**Table 4:** Audit Checklist for Compliance with the Conditions Contained in EMP (November 2013) (DEA Reference No. 14/12/16/3/3/2/470)

Objective	Mitigation: Action/control	Responsibility	Timeframe	Compliance Rating (0 – 3)	Audit Finding
	Appoint a specialist to undertake an ecological walk through survey prior to construction of the facility and the power line.	Developer	Design Stage	N/A	Action/control measure is not applicable considering the status of the project. This measure will become applicable once the project receives preferred bidder status.
	Appoint a specialist to undertake an avifaunal walk through survey of the power line prior to construction	Developer	Design Stage	N/A	Action/control measure is not applicable considering the status of the project. This measure will become applicable once the project receives preferred bidder status.
<b>Ensure the facility design responds to identified environmental constraints and opportunities</b>	Appoint a specialist to undertake an archaeological walk-through survey for the PV facility and associated infrastructure.	Developer	Design Stage	N/A	Action/control measure is not applicable considering the status of the project. This measure will become applicable once the project receives preferred bidder status.
	Undertake a geotechnical pre-construction survey.	Geotechnical specialist	Design Stage	N/A	Action/control measure is not applicable considering the status of the project. This measure will become applicable once the project receives preferred bidder status.
	Undertake a geotechnical pre-construction survey.	Geotechnical specialist	Design Stage	N/A	Action/control measure is not applicable considering the status of the project. This measure will become applicable once the project receives preferred bidder status.
	Obtain any additional environmental permits required (e.g. water use license,	Developer	Design Stage	N/A	Action/control measure is not applicable considering the status of the project. This measure will become

Objective	Mitigation: Action/control	Responsibility	Timeframe	Compliance Rating (0 – 3)	Audit Finding
	permit to impact on protected plant species,etc.).				applicable once the project receives preferred bidder status.
	As far as possible, avoid identified sensitive areas within the site in the final design of the facility.	Engineering consultant and the Developer	Design review	N/A	Action/control measure is not applicable considering the status of the project. This measure will become applicable once the project receives preferred bidder status.
	Consider and incorporate design level mitigation measures recommended by the specialists as detailed within the EIA Report and relevant appendices.	Engineering consultant, design component and the Developer	Design review	N/A	Action/control measure is not applicable considering the status of the project. This measure will become applicable once the project receives preferred bidder status.
	External access point and Internal access road to be carefully planned to maximise road user safety.	Developer	Design Stage	N/A	Action/control measure is not applicable considering the status of the project. This measure will become applicable once the project receives preferred bidder status.
	Compile a comprehensive storm water management plan for the project. This must include appropriate means for the handling of storm water within the site, e.g. separate clean and dirty water streams around the plant, install stilling basins to capture large volumes of run-off, trapping sediments, and reduce flow velocities (i.e. water used when washing the panels).	Developer	Design Stage	N/A	Action/control measure is not applicable considering the status of the project. This measure will become applicable once the project receives preferred bidder status.
	Use bird-friendly power line towers and conductor designs.	Developer	Design	N/A	Action/control measure is not applicable considering the status of the project. This measure will become

Objective	Mitigation: Action/control	Responsibility	Timeframe	Compliance Rating (0 – 3)	Audit Finding
	<p>In designing the facility, use should be made of existing road infrastructure as far as practical. Where no road infrastructure exists, new roads should be placed within existing disturbed areas or management measures must be implemented to ensure minimum damage is caused to natural habitats.</p>	Developer	Design phase	N/A	<p>applicable once the project receives preferred bidder status.</p> <p>Action/control measure is not applicable considering the status of the project. This measure will become applicable once the project receives preferred bidder status.</p>
	<p>Roads must be designed so that changes to surface water runoff are avoided or minimised and erosion is not initiated.</p>	Developer	Design phase	N/A	<p>Action/control measure is not applicable considering the status of the project. This measure will become applicable once the project receives preferred bidder status.</p>
	<p>Consult a lighting engineer or other qualified personnel to assist in the planning and placement of light fixtures in order to reduce visual impacts associated with glare and light trespass.</p>	Developer	Design phase	N/A	<p>Action/control measure is not applicable considering the status of the project. This measure will become applicable once the project receives preferred bidder status.</p>
	<p>The facility should be designed in such a manner to allow surface and subsurface movement of water along drainage lines so as not to impede natural surface and subsurface flows. Drainage measures must promote the dissipation of storm water.</p>	Developer	Design phase	N/A	<p>Action/control measure is not applicable considering the status of the project. This measure will become applicable once the project receives preferred bidder status.</p>
<p><b>Ensure the selection of the best environmental option for the alignment of the</b></p>	<p>Undertake pre-construction surveys for protected flora within all areas to be disturbed</p>	Specialist	Design review phase	N/A	<p>Action/control measure is not applicable considering the status of the project. This measure will become</p>

Objective	Mitigation: Action/control	Responsibility	Timeframe	Compliance Rating (0 – 3)	Audit Finding
power line, pipeline development areas and access roads	<p>Obtain permits for protected plant removal and relocation prior to commencement of activity in an area</p>	Developer	Pre-construction	N/A	<p>applicable once the project receives preferred bidder status.</p> <p>Action/control measure is not applicable considering the status of the project. This measure will become applicable once the project receives preferred bidder status.</p>
	<p>Use design-level mitigation measures recommended in respect of habitat and ecosystem intactness and prevention of species loss as detailed within the EIA Report</p> <ul style="list-style-type: none"> <li>» This includes positioning components of the development as close as practical together and in close proximity to other existing or planned developments in the area</li> <li>» Strictly adhere to existing tracks/roads where drainage lines/ephemeral rivers need to be crossed to gain access to the site</li> <li>» Sites for storing, mixing, and handling introduced materials, including all machinery, must be placed to avoid ecologically sensitive areas. Such sites must be clearly indicated in site plans and method statements and strictly adhered to.</li> <li>» Sites for temporary storage of topsoil, if necessary, and estimated volumes of</li> </ul>	Developer	Prior to submission of final construction layout plan	N/A	<p>Action/control measure is not applicable considering the status of the project. This measure will become applicable once the project receives preferred bidder status.</p>

Objective	Mitigation: Action/control	Responsibility	Timeframe	Compliance Rating (0 – 3)	Audit Finding
	topsoils to be stored must be indicated in the layout plans				
	Access roads and machinery turning points must be planned to minimise the impacted area, avoid the initiation of accelerated soil erosion and prevent unnecessary soil compaction and disturbance of topsoils, prevent obstruction or alteration of natural water flow	Developer	Design phase	N/A	Action/control measure is not applicable considering the status of the project. This measure will become applicable once the project receives preferred bidder status.
	Compile a comprehensive storm water management and erosion control plan for hard surfaces as part of the final design of the project	Developer	Design phase	N/A	Action/control measure is not applicable considering the status of the project. This measure will become applicable once the project receives preferred bidder status.
	A Method Statement for the management of storm water which also considers the recommendations below is to be submitted to the ECO.	Developer	Pre-construction	N/A	Action/control measure is not applicable considering the status of the project. This measure will become applicable once the project receives preferred bidder status.
<b>Minimise storm water runoff (guideline for stormwater management plan)</b>	Reduce the potential increase in surface flow velocities and the resultant impact on the localised drainage system through increased sedimentation.	Developer	Planning and design	N/A	Action/control measure is not applicable considering the status of the project. This measure will become applicable once the project receives preferred bidder status.
	Appropriately plan hard-engineered bank erosion protection structures.	Developer	Planning and design	N/A	Action/control measure is not applicable considering the status of the project. This measure will become applicable once the project receives preferred bidder status.



Objective	Mitigation: Action/control	Responsibility	Timeframe	Compliance Rating (0 – 3)	Audit Finding
	Ensure suitable handling of storm water within the site (i.e. separate clean and dirty water streams around the plant and install stilling basins to capture large volumes of run-off, trapping sediments and reduce flow velocities) through appropriate design of the facility.	Developer	Construction and operation	N/A	Action/control measure is not applicable considering the status of the project. This measure will become applicable once the project receives preferred bidder status.
	Design measures for storm water management need to allow for surface and subsurface movement of water along drainage lines so as not to impede natural surface and subsurface flows.	Developer	Planning and design	N/A	Action/control measure is not applicable considering the status of the project. This measure will become applicable once the project receives preferred bidder status.
<b>Search and Rescue of All Translocatable Indigenous Plants</b>	Search and Rescue (S&R) of certain translocatable, selected succulents, shrubs and bulbs occurring in long term & permanent, hard surface development footprints (i.e. all buildings, new roads and tracks, laydown areas, and panel positions) should take place. All such development footprints must be surveyed and pegged out as soon as possible, and then a local horticulturist with Search and Rescue experience should be appointed to undertake the S&R. All rescued species should be bagged (and cuttings taken where appropriate) and kept in the horticulturist's or a designated on-site nursery, and should be returned to site once all construction is completed and rehabilitation of disturbed areas is	ECO and horticultural Contractor	Prior to construction	N/A	Action/control measure is not applicable considering the status of the project. This measure will become applicable once the project receives preferred bidder status.

Objective	Mitigation: Action/control	Responsibility	Timeframe	Compliance Rating (0 – 3)	Audit Finding
	required. Replanting should only occur in spring or early summer (August to October), once the first rains have fallen, in order to facilitate establishment.				
	Plants that can be considered for rescue are all bulbs and succulents, and certain shrubs.	ECO and horticultural Contractor	Prior to construction	N/A	Action/control measure is not applicable considering the status of the project. This measure will become applicable once the project receives preferred bidder status.
<b>To ensure effective communication mechanisms</b>	Rescue and replanting to be undertaken in accordance of relevant permits.	ECO and horticultural Contractor	Prior to construction	N/A	Action/control measure is not applicable considering the status of the project. This measure will become applicable once the project receives preferred bidder status.
	Compile and implement a grievance mechanism procedure for the public (as outlined in Appendix A) to be implemented during both the construction and operational phases of the facility. This procedure should include details of the contact person who will be receiving issues raised by interested and affected parties, and the process that will be followed to address issues. This procedure should be in line with the South African Labour Law.	Developer	Pre-construction (construction procedure) Pre-operation (operation procedure)	N/A	Action/control measure is not applicable considering the status of the project. This measure will become
	Liaison with landowners is to be undertaken prior to the commencement of construction in order to provide	Developer / Contractor	Pre-construction	N/A	Action/control measure is not applicable considering the status of the project. This measure will become

Objective	Mitigation: Action/control	Responsibility	Timeframe	Compliance Rating (0 – 3)	Audit Finding
	sufficient time for them to plan agricultural activities.				applicable once the project receives preferred bidder status.

## 8. AUDIT RESULTS AND RECOMMENDATIONS

### 8.1. Overview of Audit Findings and Conclusion

Considering that the Zuurwater 75 MW Photovoltaic Plant (Phase 1) is currently not operational, and no construction activities have commenced to date (i.e. no authorised activities have commenced), all the conditions contained in the EMPr relating to any development phase of the facility are not currently applicable. It is therefore not possible to comment on the compliance with these specifications until such time that the facility receives preferred bidder status under the Department of Energy's REIPPP Programme (or an alternative Power Purchase Agreement (PPA) as may be relevant) which would enable the commencement of the development phases for the project.

Based on the fact that none of the conditions contained in the EMPr are currently applicable, it is not possible to calculate the overall compliance percentage of the Zuurwater 75 MW Photovoltaic Plant (Phase 1) (refer to **Table 5**). A rating of N/A (not applicable at this time) has been allocated.

**Table 5: Overview of the Zuurwater 75 MW Photovoltaic Plant (Phase 1) overall compliance.**

Compliance status	Rating	Description of compliance	EMPr	
			Results	%
Compliant	3	Compliant with no further action required to maintain compliance.	N/A	N/A
Compliant	2	Compliant apart from minor or immaterial recommendations to improve the strength internal controls to maintain compliance.	N/A	N/A
Compliant	1	Compliant with major or material recommendations to improve the strength of internal controls to maintain compliance.	N/A	N/A
Non-Compliant	0	Does not meet minimum requirements.	N/A	N/A
<b>TOTAL:</b>			<b>N/A</b>	<b>N/A</b>

## 9. EVALUATION OF THE EMPr

As per Appendix 7 of the EIA Regulations, GNR 326 of 2017, an external audit report must include “an indication of the ability of the EMPr to:

- (i) sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on going basis;
- (ii) Sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the closure of the facility; and
- (iii) Ensure compliance with the provisions of the EMPr;”

### 9.1. Ongoing impact avoidance, management and mitigation

Based on the audit outcomes and results reported above, the auditor is satisfied that the EMPr is sufficient and able to provide for the avoidance, management and mitigation of the environmental impacts associated with the undertaking of the activity on an ongoing basis, and that no further amendment or alteration to the EMPr is required in order to maintain this reliability of the EMPr.

However, in order to ensure that the planning and design of the facility addresses all environmental sensitives, it is recommended that the following conditions be included in the Design and Planning Phase EMPr:

- » Finalise all layout components and submit to the DEA for approval prior to commencement of construction;
- » Vegetation clearing should only commence after the walk-through has been conducted and necessary permits obtained.
- » The EMPr should form part of the contract with the Contractors appointed to construct the PV facility and associated infrastructure, and must be used to ensure compliance with environmental specifications and management measures.

The above amendments should be undertaken when the project is a preferred bidder and submitted to the DEFF for approval as per the EA.

## **9.2. Closure impact avoidance, management and mitigation**

The facility has not started with any of the listed activities (i.e. no construction activities has commenced) and will therefore not be decommissioned or closed in the foreseeable future, and therefore no decommissioning activities are applicable to this audit. The current EMPr is not considered sufficient to address the decommissioning phase of the project. An EMPr for decommissioning would need to be developed at the stage in the project life-cycle when this is applicable.

## **9.3. Ensuring compliance with provisions of the EMPr**

Based on the audit outcomes and results reported above, the auditor is satisfied that the EMPr is sufficient and able to ensure compliance with the provisions of the environmental authorisation and EMPr, and that no further amendment or alteration to the EMPr is required in order to maintain this reliability of the EMPr at this stage. However, a decommissioning EMPr will be required to be compiled at the time when this activity becomes applicable.

No additional impacts or risks have been identified to be associated with the undertaking of the proposed activities based on the desk-top audit.

Considering that the Zuurwater 75 MW Photovoltaic Plant (Phase 1) is currently not operational, and no construction activities have commenced to date (i.e. no authorised activities have commenced), all the conditions contained in the EMPr relating to any development phase of the facility are not currently applicable. It is therefore not possible to audit and report on the compliance with these specifications until such time that the facility receives preferred bidder status under the Department of Energy's REIPPP Programme (or an alternative Power Purchase Agreement (PPA) as may be relevant) which would enable the commencement of the development phases for the project.

# **10. CONCLUSIONS AND RECOMMENDATIONS**

---

No non-compliances were recorded as part of the independent external environmental compliance audit of the project EMPr. As a result, no recommendations are considered applicable.

It is the opinion of the independent auditor that the project EMPr (November 2013), and its supporting documentation sufficiently provides for the avoidance, management and mitigation of environmental impacts associated with the project (DEA Reference No.: 14/12/16/3/3/2/470) and amendments thereto. The current EMPr is however not considered sufficient to address the decommissioning phase of the project. An EMPr for decommissioning would need to be developed at the stage in the project life-cycle when this is applicable.

## 11. STAKEHOLDER CONSULTATION

---

### 11.1. Notification of all potential and registered interested and affected parties

In accordance with the requirements of Section 34(6) of the EIA Regulations (GNR 326 of 2017), the following consultation must form part of the audit report submission:

- » Within 7 days of the date of submission of an environmental audit report to the competent authority, the holder of an environmental authorisation must notify all potential and registered interested and affected parties of the submission of that report, and make such report immediately available
  - \* (a) to anyone on request; and
  - \* (b) on a publicly accessible website, where the holder has such a website.

In order to remain compliant with these requirements, all potential and registered interested and affected parties have been notified of the submission of the external compliance audit report by:

- » The placement of an advertisement with a local newspaper, the *Gemsbok*, on the 4<sup>th</sup> of December 2019 and (**Appendix B**)
- » Notification of all registered I&APs via email on 7 December 2019 (refer to **Appendix C**); and
- » Uploading the audit report onto the Savannah Environmental website ([www.savannahsa.com](http://www.savannahsa.com)) for download upon request.

**APPENDIX A:**  
**CVS OF INDEPENDENT AUDITOR/S AND REPORT REVIEWER**

## CURRICULUM VITAE OF KRITANYA NAIDOO

- Profession:** Environmental Compliance Consultant
- Specialisation:** Environmental, Health and Safety compliance audits. ISO management system audits, implementation and monitoring, Compilation of monthly SHEQ reports for projects in the infrastructure and service provider sectors.
- Work Experience:** 4 years' experience in the SHEQ field.

### VOCATIONAL EXPERIENCE

Kritanya hold a Master's degree in Population Studies and 4 years SHEQ experience in conducting Environmental Compliance Audits, Environmental, Quality and Health and Safety Management System Audits, implementation and maintenance of ISO 14001: 2015 and ISO 9001:2015 systems.

### SKILLS BASE AND CORE COMPETENCIES

- Report writing
- Environmental Compliance and System Audits
- Understanding the implementation of NEMA and NEMWA
- Maintaining and implementation of ISO 14001 and ISO 9001 and OHSAS standards

### EDUCATION AND PROFESSIONAL STATUS

#### Degrees:

- M. (Masters) Population Studies (2013), University of KwaZulu-Natal, KZN
- B.SS. (Hons.) Geography and Environmental Management (2011), University of KwaZulu-Natal, KZN
- B.SS. Geography and Environmental Management (2010), University of KwaZulu-Natal, KZN

#### Courses:

- First aider (2015)
- SHE Representative Course (2015)
- ISO 9001:2015 Internal Auditor Training (2016)
- ISO 14001:2015 Environmental Management System Training (2017)



## EMPLOYMENT

Date	Company	Roles and Responsibilities
March 2019 - Current	Savannah Environmental (Pty) Ltd	<u>Environmental Compliance Consultant</u>  Tasks include: Scheduled and Ad-hoc ECO audits and checklists. Statutory audits and audits against permits/licences in accordance with legislative requirements. Management system audits checklists & report writing. Environmental Management Programme Revisions. Environmental Authorisation amendments. Review and comment on monthly ECO reports. Review of permits and licences. Assist with identifying new opportunities
October 2017-August 2018	Stefanutti Stocks, KZN Building Division	<u>Environmental and Quality Officer</u>  <i>Tasks included: Conduct Environmental Compliance and System Audits. Monitor/Review all environmental statistics. Implement and maintain the Quality Management Systems (QMS). Conduct QMS audits. Write monthly reports on the status of the Quality and Environmental Systems. SHEQ document controller. Involvement in the development and implementation of the Quality Electronic System (Plumbum).</i>
September 2016-September 2017	3 Energy Renewables	<u>Environmental Officer</u>  <i>Tasks included: Carry out Environmental and Social Audits based on the Environmental Authorisation, Environmental Management Plan, Environmental Aspects and Social Concerns at various Renewable Energy Power Plants. Assist in conducting internal Health and Safety inspections and audits at various Renewable Energy Power Plants. Assist with HSE incidents at the Renewable Energy Power Plants. Develop and implement ISO 9001:2015, Quality Management System (QMS). Conduct QMS internal audits, document control and corrective action.</i>

## PROJECT EXPERIENCE

### Renewable Power Generation Projects: Wind Energy Facilities

#### Environmental Compliance, Auditing and ECO

Project Name & Location	Client Name	Role
Amakhala Emoyeni WEF, Eastern Cape	Cennergi	Environmental Officer
Tsitsikamma WEF, Eastern Cape	Cennergi	Environmental Officer
Koega WEF, Eastern Cape	Koega Wind Power	Environmental Officer
Metrowind Van Staadens WEF Eastern Cape	Rubicept	Environmental Officer
Roggeveld WEF, Northern and Western Cape	Building Energy	ECO

**Infrastructure Development Projects (bridges, pipelines, roads, waste etc)**

**Basic Assessments**

<b>Project Name &amp; Location</b>	<b>Client Name</b>	<b>Role</b>
<i>Nigel Gas Pipeline and associated infrastructure, Gauteng Province</i>	<i>Energy Group</i>	<i>Compliance Consultant</i>



## CURRICULUM VITAE OF JO-ANNE THOMAS

<b>Profession:</b>	Environmental Management and Compliance Consultant; Environmental Assessment Practitioner
<b>Specialisation:</b>	Environmental Management; Strategic environmental advice; Environmental compliance advice & monitoring; Environmental Impact Assessments; Policy, strategy & guideline formulation; Project Management; General Ecology
<b>Work experience:</b>	Twenty one (21) years in the environmental field

### VOCATIONAL EXPERIENCE

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

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

### SKILLS BASE AND CORE COMPETENCIES

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

## EDUCATION AND PROFESSIONAL STATUS

### Degrees:

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

### Short Courses:

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

### Professional Society Affiliations:

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

## EMPLOYMENT

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

## PROJECT EXPERIENCE

Project experience includes large infrastructure projects, providing technical input for projects in the environmental management field, specialising in Strategic Environmental Advice, Environmental Impact Assessment studies, environmental permitting, Public Participation, Environmental Management Plans (EMPs) and Programmes (EMPrs), environmental policy, strategy and guideline formulation, and integrated environmental management; with a key focus on strategic assessment, and providing practical and achievable environmental management solutions and mitigation measures.

## RENEWABLE POWER GENERATION PROJECTS: PHOTOVOLTAIC SOLAR ENERGY FACILITIES

### Environmental Compliance, Auditing and ECO

Project Name & Location	Client Name	Role
ECO and bi-monthly auditing for the construction of the Adams Solar PV Project Two South of Hotazel, Northern Cape	Enel Green Power	Project Manager
ECO for the construction of the Kathu PV Facility, Northern Cape	REISA	Project Manager
ECO and bi-monthly auditing for the construction of the Pulida PV Facility, Free State	Enel Green Power	Project Manager

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

### Compliance Advice and ESAP Reporting

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

### Due Diligence Reporting

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

### **RENEWABLE POWER GENERATION PROJECTS: CONCENTRATED SOLAR FACILITIES (CSP)**

#### Environmental Compliance, Auditing and ECO

Project Name & Location	Client Name	Role
ECO for the construction of the !Khi CSP Facility, Northern Cape	Abengoa Solar	Project Manager
ECO for the construction of the Ilanga CSP 1 Facility near Upington, Northern Cape	Karoshhoek Solar One	Project Manager

<b>Project Name &amp; Location</b>	<b>Client Name</b>	<b>Role</b>
ECO for the construction of the folar Park, Northern Cape	Kathu Solar	Project Manager
ECO for the construction of the KaXu! CSP Facility, Northern Cape	Abengoa Solar	Project Manager
Internal audit of compliance with the conditions of the IWUL issued to the Karoshoek Solar One CSP Facility, Northern Cape	Karoshoek Solar One	Project Manager

#### **Compliance Advice and ESAP reporting**

<b>Project Name &amp; Location</b>	<b>Client Name</b>	<b>Role</b>
Ilanga CSP Facility near Upington, Northern Cape	Ilangethu Energy	Environmental Advisor
Ilangalethu CSP 2, Northern Cape	FG Emvelo	Environmental Advisor
Kathu CSP Facility, Northern Cape	GDF Suez	Environmental Advisor
Lephalale SEF, Limpopo	Cennergi	Environmental Advisor
Solis I CSP Facility, Northern Cape	Brightsource	Environmental Advisor

#### **RENEWABLE POWER GENERATION PROJECTS: WIND ENERGY FACILITIES**

##### **Environmental Compliance, Auditing and ECO**

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

##### **Compliance Advice**

<b>Project Name &amp; Location</b>	<b>Client Name</b>	<b>Role</b>
Amakhala Phase 1 WEF, Eastern Cape	Cennergi	Environmental Advisor
Dassiesfontein WEF within the Overberg area, Western Cape	BioTherm Energy	Environmental Advisor
Excelsior Wind Farm, Western Cape	BioTherm Energy	Environmental Advisor

Great Karoo Wind Farm, Northern Cape	African Clean Energy Developments (ACED)	Environmental Advisor
Hopefield Community WEF, Western Cape	African Clean Energy Developments (ACED)	Environmental Advisor
Rheboksfontein WEF, Western Cape	Moyeng Energy	Environmental Advisor
Tiqua WEF, Western Cape	Cennergi	Environmental Advisor
Tsitsikamma WEF, Eastern Cape	Cennergi	Environmental Advisor
West Coast One WEF, Western Cape	Moyeng Energy	Environmental Advisor

#### **Due Diligence Reporting**

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

### **CONVENTIONAL POWER GENERATION PROJECTS (COAL)**

#### **Environmental Compliance, Auditing and ECO**

<b>Project Name &amp; Location</b>	<b>Client Name</b>	<b>Role</b>
ECO for the Camden Power Station, Mpumalanga	Eskom Holdings	Project Manager

#### **Compliance Advice**

<b>Project Name &amp; Location</b>	<b>Client Name</b>	<b>Role</b>
Thabametsi IPP Coal-fired Power Station, near Lephalale, Limpopo	Axia	Environmental Advisor

### **GRID INFRASTRUCTURE PROJECTS**

#### **Environmental Compliance, Auditing and ECO**

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

### **MINING SECTOR PROJECTS**

#### **Environmental Compliance, Auditing and ECO**

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

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

##### **Environmental Compliance, Auditing and ECO**

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



## **HOUSING AND URBAN PROJECTS**

### **Compliance Advice and reporting**

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

### **Environmental Compliance, Auditing and ECO**

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

**APPENDIX B:**  
**ADVERTISEMENT OF SUBMISSION OF THE AUDIT REPORT**

# **NOTICE OF EXTERNAL COMPLIANCE AUDIT (SECTION 54)**

## **PUBLIC PARTICIPATION PROCESS: PV FACILITIES ON THE FARM ZUURWATER NO.62 NEAR AGGENEYS, NORTHERN CAPE PROVINCE**

---

**Activity:**

Development of PV Facilities and associated infrastructure located at the farm Zuurwater which is located within the Khai-Ma Local Municipality in the Namakwa District Municipality in the Northern Cape. The development consists of seven (7) projects including:

- » PV Plant on the farm Zuurwater No.62 , near Aggeneys (Phase 1)– DEA Ref.: 14/12/16/3/3/2/470
- » PV Plant on the farm Zuurwater No.62 , near Aggeneys (Phase 2) – DEA Ref.: 14/12/16/3/3/2/471
- » PV Plant on the farm Zuurwater No.62 , near Aggeneys (Phase 3) – DEA Ref.: 14/12/16/3/3/2/472
- » PV Plant on the farm Zuurwater No.62 , near Aggeneys (Phase 4) – DEA Ref.: 14/12/16/3/3/2/473
- » PV Plant on the farm Zuurwater No.62 , near Aggeneys (Unit 4) – DEA Ref.:12/12/20/2334/4
- » PV Plant on the farm Zuurwater No.62 , near Aggeneys (Unit 5) – DEA Ref.:12/12/20/2334/5
- » Powerline from Aggeneys Solar One Energy Facility to the Aggeneis MTS Substation on Remaining extent of Portion 3 of the Farm Zuurwater 62 – DEA Ref.:14/12/16/3/3/1/1270

No activities related to the Zuurwater PV Facilities have commenced to date.

The property affected by the proposed PV facilities is the Farm Zuurwater No.62, within the Namakwa District Municipality.

**External Compliance Audit:** In terms of Section 54(A)(3) of the EIA Regulations 2014 of GNR 326, Independent External Compliance Audits ("S54 Audit") are required to verify compliance towards the Environmental Management Programmes (EMPr) for the projects. This advertisement hereby notifies all potential and registered interested and affected parties, including organs of state with applicable jurisdiction as well as the competent authority, of the submission of the external compliance audit report to the competent authority prior to 07 December 2019. The reports are available for download at <https://www.savannahsa.com/>

Please direct any queries, information requests or comments to the DEA compliance directorate, at the following:

**Department of Environmental Affairs (DEA) Legal Authorisations and Compliance Inspectorate**

E-mail: [compliance@environment.gov.za](mailto:compliance@environment.gov.za)

**GEMSBOK-UPINGTON:** As the long summer holidays draw near, millions of people across the country will be planning long road trips to visit friends and family.

It is a time for relaxation, on the beach, around the pool and around the braai. Tragically, for many families, the summer of fun can become a season of mourning.



**APD UPINGTON**  
**MAATSKAPLIKE WERKER**

**VEREISTES:**

- Kode EB geldige Lisensie
- Geregistreer by die SACSSP
- Verkeislik minstens 3 jaar ondervinding as Maatskaplike Werker en ook Statutêre werk
- Bereid om te reis
- Vermoë om in diverse omstandighede te werk en te funksioneer

E-pos volledige CV's met gesertifiseerde dokumente na [apdupdt@mweb.co.za](mailto:apdupdt@mweb.co.za) of faks na 086 295 3075

Navrae: Karin Mostert 087 086 2907

**Sluitingsdatum: 6 Desember 2019**

Children's safety advocacy organisation, ChildSafe, is calling on parents and care-givers to be the adult this season, and to prioritise the safety of children under their care. In particular, says Yolande Baker, Childsafe Executive Director, adults need to be especially vigilant when driving or near water. "Drowning can happen so quickly, even in

# Keep our children safe this festive season, says ChildSafe

circumstances where the most observant adults are present," says Baker. "It's a silent killer. A child can slip under the water without a splash and in seconds, before anyone realises what has happened, it's too late," she says.

According to a study by Dr Colleen Saunders (research manager in UCT's Division of Emergency Medicine) and others, it was found that drowning was the leading cause of death of children and young people worldwide.

In the Western Cape alone, drowning mortality rates for children were reported at 3.8 per 100 000 children. This figure increases to 4.8 per 100 000 in children aged 4 and younger.

Most (78%) drownings mainly happen in large bodies of open water, such as the sea or in dams, with many incidents happening over the summer time (42%) and on public holidays (8%).

Poor supervision, risky behaviour in adults and external environmental factors, such as unpredictable sea currents, unsupervised swimming pools and open buckets were primarily responsible for the deaths.

Adult behaviour is a significant factor in road traffic fatalities and injuries, too, says Baker.

Every year, 13 000 people do not arrive at their holiday destinations because they are killed in road traffic crashes. Another 265 000 people are injured. Many of those who die and are injured are children.

The Red Cross War Memorial Children's Hospital alone treats around 1 000 children who have been involved in road traffic crashes. Most are admitted with head injuries, or injuries to their arms and legs, which often have life-changing personal, economic, health and social consequences.

"The good news is that every parent, caregiver and driver has it in their power to prevent children from being injured in motor vehicle crashes," says Baker. A 2018 study, conducted by Childsafe and UNICEF, identified the two major reasons for vehicle crashes: speed and inadequate restraints in cars.

South African road traffic law stipulates that every child under

the age of three must be restrained in an age-appropriate child restraint. At the very minimum, children must be restrained by a seatbelt. Holding the child is unsafe. In a crash, the child can be ejected on impact or crushed to death under the adult's weight," says Baker. If they are strapped into a restraint designed for their age, children have up to 80% chance of surviving a crash.

Speed is another culprit, she explains, especially in places where children congregate in residential areas and around schools. "The speed limit of 60km/hour is still too high. All evidence indicates that if a child is hit at 30km/hour, they have a 90% chance of surviving the crash. The probability that they will die increases with every kilometre faster the car is moving."

By making the correct choices to slow down and install suitable car restraints, the chances that children will survive those incidents are vastly improved, ensuring that summer holidays bring only happy memories."

Visit the ChildSafe website [www.childsafe.org.za](http://www.childsafe.org.za) for a full range of safety tips to guide you in the home, in water, when playing with toys, choking, in the car and even at the playground and what to do in an emergency for any of the above.

**Three simple checks to save you money on your tyres**

Tips for staying safe on the road:  
1. Maintain pressure  
Check your tyre pressure at least once per month at the filling station. On the inside panel of the driver's door, in the fuel cap or the vehicle owner's manual, you will find a sticker that details the correct tyre pressure for your vehicle's tyres. Always ensure that your tyres are maintained at the correct inflation as prescribed by your vehicle manufacturer, as this is the easiest way to extend tyre life and ensure that your car handles properly on the road. Under- or over-inflation of tyres can cause damage to the tyre, reduce their lifespan or could result in an accident.

2. Inspect the tread and tyre regularly  
Around once a month, turn the steering to the far right to get a full view of the front tyres and inspect the tread. Look out for uneven tread wear and inspect the tyre tread depth. Then check the rear tyres as well. Tyre manufacturers include a tread wear indicator (TWI) within the tyre tread. This indicator looks like a small square in the groove of the tyre. As an international standard the TWI is set at 1.6mm and when the rest of the tyre tread is level with this indicator, or below, your tyres are no longer legal and need to be replaced. It is important to note that once you go below 3mm tread depth, the braking performance of your tyres will be reduced. Once the tread gets to the absolute minimum – the 1.6mm – your wet braking could increase by more than double, and you will have a problem stopping your vehicle in an emergency. The tyre is also illegal according to The National Road Traffic Act.

During this visual inspection, always make sure to check the sides of the tyres for bulges (or bubble type defects), gashes or cuts that expose any steel wires or fabric in the tyre. According to the National Road Traffic Act, a legal tyre must be free of these defects.

**GEMSBOK-UPINGTON: Road safety is the responsibility of all road users, says President Cyril Ramaphosa. "Safer roads begin with checking our vehicles and keeping them off the road if they are not roadworthy," he said in a recent speech addressing various stakeholders and the public.**

The South African President mourned the loss of over 14000 lives due to accidents on our roads and acknowledged the estimated R147 million per year that roadway accidents cost the country. He went on to stress that roads will not become safer unless we, as road users, change our attitudes.

"Tyre maintenance is a vital part of keeping a vehicle roadworthy," says CEO of Sumitomo South Africa, Riaz Hafjee. "It is our mission to help road users identify safe tyres on their personal vehicle – or on a public transport vehicle that they are about to climb into. Unsafe 2nd hand tyres are also a major threat to road safety and consumers need to be aware of the risks."

**NOTICE OF EXTERNAL COMPLIANCE AUDIT (SECTION 54) PUBLIC PARTICIPATION PROCESS: PV FACILITIES ON THE FARM ZUURWATER NO.62 NEAR AGGENEYS, NORTHERN CAPE PROVINCE**

**Activity:**  
Development of PV Facilities and associated infrastructure located at the farm Zuurwater which is located within the Khai-Ma Local Municipality in the Namakwa District Municipality in the Northern Cape. The development consists of seven (7) projects including:

- » PV Plant on the farm Zuurwater No.62, near Aggeneys (Phase 1) – DEA Ref.: 14/12/16/3/2/470
- » PV Plant on the farm Zuurwater No.62, near Aggeneys (Phase 2) – DEA Ref.: 14/12/16/3/2/471
- » PV Plant on the farm Zuurwater No.62, near Aggeneys (Phase 3) – DEA Ref.: 14/12/16/3/2/472
- » PV Plant on the farm Zuurwater No.62, near Aggeneys (Phase 4) – DEA Ref.: 14/12/16/3/2/473
- » PV Plant on the farm Zuurwater No.62, near Aggeneys (Unit 4) – DEA Ref.: 12/12/20/2334/4
- » PV Plant on the farm Zuurwater No.62, near Aggeneys (Unit 5) – DEA Ref.: 12/12/20/2334/5
- » Powerline from Aggeneys Solar One Energy Facility to the Aggeneys MTS Substation on Remaining extent of Portion 3 of the Farm Zuurwater 62 – DEA Ref.: 14/12/16/3/1/1270

No activities related to the Zuurwater PV Facilities have commenced to date. The property affected by the proposed PV facilities is the Farm Zuurwater No.62, within the Namakwa District Municipality.

**External Compliance Audit:** In terms of Section 54(A)(3) of the EIA Regulations 2014 of GNR 326, Independent External Compliance Audits ("S54 Audit") are required to verify compliance towards the Environmental Management Programmes (EMPr) for the projects. This advertisement hereby notifies all potential and registered interested and affected parties, including organs of state with applicable jurisdiction as well as the competent authority, of the submission of the external compliance audit report to the competent authority prior to 07 December 2019. The reports are available for download at <https://www.savannahsa.com/>

Please direct any queries, information requests or comments to the DEA compliance directorate, at the following: **Department of Environmental Affairs (DEA) Legal Authorisations and Compliance Inspectorate**

E-mail: [compliance@environment.gov.za](mailto:compliance@environment.gov.za)

**NOTICE OF EXTERNAL COMPLIANCE AUDIT (SECTION 54) PUBLIC PARTICIPATION PROCESS: SOLARRESERVE KOTULO TSATSI CONCENTRATED SOLAR POWER FACILITIES 1, 2 AND 3 AND PHOTOVOLTAIC POWER PLANT 2, NORTHERN CAPE PROVINCE**

**Activity:**  
Development of the SolarReserve Kotulo Tsatsi Concentrated Solar Power (CSP) Facilities 1, 2 and 3 and Photovoltaic (PV) Power Plant 2 approximately 70km south west of Kenhardt within the Hanlam Local Municipality of the Namakwa District Municipality and the Kai Igarib Local Municipality of the ZF Mgcawu District Municipality. The four projects are known as:

- » The 200MW SolarReserve Kotulo Tsatsi Concentrated Solar Power Facility 1 (CSP 1) – DEA Ref.: 14/12/16/3/2/694/1
- » The 200MW SolarReserve Kotulo Tsatsi Concentrated Solar Power Facility 2 (CSP 2) – DEA Ref.: 14/12/16/3/2/694/2
- » The 200MW Kotulo Tsatsi (Pty) Ltd CSP facility (CSP3) – DEA Ref.: 14/12/16/3/2/694
- » The Kotulo Tsatsi Photovoltaic Power Plant 2 (PV 2) – DEA Ref.: 14/12/16/3/2/696

No activities related to the four projects have commenced to date.

Properties affected by the four projects include:

- » Portion 1, 2 and 3 of the Farm Styns Vley 280;
- » Portion 2 of the Farm Kopjes Vley 281;
- » Portion 1 of the Farm Melkbosch Vley 278;
- » Portion 1 and the Remainder of the Farm Manier Tyds Kolkies;
- » Portion 2 of the Farm Karree Boom Kolk 248;
- » Portion 1 and Portion 2 of the Farm Voren Toe Zyn Kolk 277;
- » Portion 1, 2 and 4 of the Farm Klein Zwart Bast 188; and
- » Portion 14 and 15 of the Farm Olyven Kolk 187.

**External Compliance Audit:** In terms of Section 54(A)(3) of the EIA Regulations 2014 of GNR 326, Independent External Compliance Audits ("S54 Audit") are required to verify compliance towards the Environmental Management Programmes (EMPr) for the projects. This advertisement hereby notifies all potential and registered interested and affected parties, including organs of state with applicable jurisdiction as well as the competent authority, of the submission of the external compliance audit report to the competent authority. These reports are available at <https://www.savannahsa.com/public-documents/other/> for 14 days from date of publication of this notice.

Please direct any queries, information requests or comments to the DEA compliance directorate, at the following: **Department of Environmental Affairs (DEA) Legal Authorisations and Compliance Inspectorate**

E-mail: [compliance@environment.gov.za](mailto:compliance@environment.gov.za)

**MEDIC ONE**  
HEALTHCARE

**Healthcare Sales**  
Available Vacancies:  
10 Consultant positions  
1 Team Leader  
Only serious candidates to apply  
To start IMMEDIATELY  
No Experience Needed  
**Basic Package**  
R7500 - R9500 +  
Company bonuses  
For an interview SMS your Name & Area to 081 214 9454

**UPINGTON INDUSTRIEEL STOORMAN**

Ons benodig die diens van 'n persoon met die nodige kennis van voorraad bestuur. 'n Geldige bestuurslisensie sal tot u voordeel wees. Die aangewese persoon moet selfgenoteerd wees en moet sonder toesig kan werk.

Sal ook verantwoordelik wees om sekere take te verrig in die besigheid. Indien u dink dat u die regte persoon is, skakel Upington Industrieel by telefoon 054 337 0200 of Johan Kuhn by 072 998 3137 gedurende kantoorure. Die nodige aansoekvorm is beskikbaar by Upington Industrieel se ontvangs.

Indien u nie binne 14 dae van ons hoor nie, moet u aanvaar dat u aansoek nie suksesvol was nie.

**ouhout**  
**MEUBELS**

**Verkoopsassistent**

Ouhout Meubels Kathu benodig die dienste van 'n verkoopsassistent. Ondervinding in verkope 'n vereiste. Kontak Rikky by 071 876 4605 of stuur CV na [kathu@ouhout.co.za](mailto:kathu@ouhout.co.za)

**SALES CONSULTANT**

**Microfinance Co seeks an experienced SALES CONSULTANT with: Grade 12 (Accounting/Maths)**

E-mail CV to: [careers@letsatfinance.co.za](mailto:careers@letsatfinance.co.za) or fax to 086 641 3016

**MUNISIPALITEIT DAWID KRUIPER**  
**KENNISGEWING K77/2019**  
**VERVREEMDING VAN EIENDOM**

Kennis geskied dat die Raad van voornemens is om die volgende eiendom, by wyse van privaat onderhandelinge te verveem:

EIENDOM	GROOTTE	LIGGING	AANWENDING
Gedeelte van Erf 5436 ten noorde van Erf 4020, Upington	±350m²	Loerieweg, Keidebees	Residensieel
Gedeelte van Erf 553, aangrensend Erf 372, Upington	±100m²	Schröderstraat, Upington	Residensieel
Erwe 798 & 799, Rietfontein	Beide 663m² groot	Rietfontein	Residensieel

Die Vervreemdingsvoorwaardes sal deur die Raad se Tendertoeëningskomitee bepaal word.

Verdere navrae en inligging is beskikbaar vanaf die Hoof Administratiewe Beampte: Regsdienste by telefoonnommer (054) 338 7011. Besware, indien enige, moet nie later as **Vrydag, 20 Desember 2019**, by die Munisipale Kantore, Mutualstraat, Upington ingedien word.

**E NTOBA, MUNISIPALE BESTUURDER:**  
Burgersentrum, Marktstraat, Privaatsak X 6003, UPINGTON, 8800.

3. Rotate regularly  
The general rule for tyre rotation is every 8000 – 10000km but diarise to have your tyres rotated and balanced by a reputable fitment centre once every six or seven months. If you see uneven tyre wear or feel a "shudder" when driving, get them checked straight away. Ask the tyre expert to give your tyres a thorough once over to ensure that they are safe for use on the road.

Doing these three simple checks, will give longevity to your tyre, reduce the likelihood of failures due to damage and will ensure your vehicle performs as it should on the road.

Your first choice should always be to replace a worn or damaged tyre with a new tyre.

For more information, please visit <http://www.dunloptyres.co.za/Partwornguide-lines>

**APPENDIX C:  
NOTIFICATION TO REGISTERED I&APS OF SUBMISSION OF THE  
AUDIT REPORT**

06 December 2019

Dear Registered Interested and Affected Party,

**NOTICE OF AN EXTERNAL COMPLIANCE AUDIT (SECTION 54A) AND PUBLIC  
PARTICIPATION PROCESS:  
PV FACILITIES AND POWER LINE ON THE FARM ZUURWATER, NEAR AGGENEYS, NORTHERN  
CAPE PROVINCE**

---

**Notification of Submission of Section 54(A)(3) Audit Reports to the Competent Authority**

---

As a registered Interested and Affected Party for the development of PV facilities, please be advised that in terms of Section 54(a)(3) of the EIA regulations (GNR 326, 7 April 2018), Savannah Environmental (Pty) Ltd has undertaken an external environmental compliance audit and prepare an external environmental compliance audit report assessing Zuurwater's (Phase 1, Phase 2, Phase 3, Phase 4, Phase 5, Unit 4, Unit 5 and Power Line) compliance with the Environmental Management Programme (EMPr) applicable to the project.

Development of PV Facilities and associated infrastructure located at the farm Zuurwater which is located within the Khai-Ma Local Municipality in the Namakwa District Municipality in the Northern Cape has reference.

The PV Facilities and associated infrastructure consists of seven (7) authorised projects including:

- » PV Plant on the farm Zuurwater No.62 , near Aggeneys (Phase 1)– DEA Ref.: 14/12/16/3/3/2/470
- » PV Plant on the farm Zuurwater No.62 , near Aggeneys (Phase 2) – DEA Ref.: 14/12/16/3/3/2/471
- » PV Plant on the farm Zuurwater No.62 , near Aggeneys (Phase 3) – DEA Ref.: 14/12/16/3/3/2/472
- » PV Plant on the farm Zuurwater No.62 , near Aggeneys (Phase 4) – DEA Ref.: 14/12/16/3/3/2/473
- » PV Plant on the farm Zuurwater No.62 , near Aggeneys (Unit 4) – DEA Ref.:12/12/20/2334/4
- » PV Plant on the farm Zuurwater No.62 , near Aggeneys (Unit 5) – DEA Ref.:12/12/20/2334/5;
- » Power Line from Aggeneys Solar One Energy Facility to the Aggeneis MTS Substation on Remaining extent of Portion 3 of the Farm Zuurwater 62 – DEA Ref.:14/12/16/3/3/1/1270

No activities related to the Zuurwater PV Facilities or associated infrastructure has commenced to date.

The property affected by the proposed PV facilities is the Farm Zuurwater No.62, within the Namakwa District Municipality.

In terms of Section 54(A)(3) of the EIA Regulations 2014 of GNR 326, an independent External Compliance Audits (' a S54 Audit') is required to verify compliance with the Environmental Management Programmes (EMPr) for the project. This advertisement hereby notifies all potential and registered interested and affected parties, including organs of state with applicable jurisdiction as well as the competent authority, of the submission of the external compliance audit report to the competent authority. The report is available for inspection at <https://www.savannahsa.com/public-documents/other/> for 14 days from date of this notification.

Please direct any queries, information requests or comments to the DEA compliance directorate, at the following:

**Department of Environmental Affairs (DEA) Legal Authorisations and Compliance Inspectorate**

E-mail: [compliance@environment.gov.za](mailto:compliance@environment.gov.za)

Kind regards

A handwritten signature in black ink, appearing to read 'Nicolene Venter', written in a cursive style.

**Nicolene Venter**

Public Participation and Social Consultant

Email: [publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)

**APPENDIX D:  
CONFIRMATION LETTER ON CURRENT STATUS OF THE PROJECT**





**Scatec Solar**  
Improving our future™

22 November, 2019

To whom it may concern,

Dear Sir/Madam

**RE: CONFIRMATION OF NO COMMENCEMENT OF ACTIVITIES OF ENVIRONMENTAL  
AUTHORISATION (DEA Ref: 14/12/16/3/3/2/470)**

This letter serves to confirm that no construction has commenced on Environmental Authorisation (DEA Ref: 14/12/16/3/3/2/470), and that there is currently no activity on the site.

As such, I Jan Fourie, being the duly authorised representative acting on behalf Scatec Solar , and duly authorised representative of Scatec Solar , hereby declare that the above statement is true to the best of my knowledge.

Should you require any further details or information, please do not hesitate to contact me.

Kind regards,



---

Name : Jan Fourie

Designation : General Manager & VP Project Development

Who warrants that he is duly authorised.